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Bristol, BS1 6PN

Reference: Grange Paddock, Ickleton Road Elmdon, S62A/2023/0015

Dear Sir/Madam,

I am strongly opposed to the above proposed development. My grounds for this are summarised in bullet point format overleaf and are then detailed more extensively within this document.

Yours sincerely,
Charles Pick

Summary

- The findings of the Village Design Statement (VDS) have not been respected (or even considered), whilst village pre-consultation on the plans was notional in nature.
- This 5.6 acres site is very prominent in the landscape, especially from parts of a nearby bridleway and from sections of the ancient Icknield Way that traverses the ridge above Elmdon en route to Freewood Farm. A height differential of 16-25 metres exists versus the site for these locations, with panoramic vistas taking in the Church and some of the village's many listed buildings. Elmdon is a very popular village for ramblers, dog walkers and cyclists, so the development would be viewed extensively.
- The site is 100% outside the village development limits in open countryside with the topographical survey data indicating a height rise of circa 9 metres from north to south so Ickleton Road houses would undergo domination.
- The proposed urban and alien development of 18 houses is located entirely on Grade 2 greenfield land. This needs to be preserved given the UK's weak supply chain position regarding food. No alternative sites have been offered up by the applicants.
- This is a highly unsustainable village in a comparatively isolated geographical location where the use of a car is unavoidable. Village facilities are extremely limited (far more so than the applicants misleadingly claim) and the NPPF requires plans promoting "*a sustainable pattern of development*". Elmdon simply does not fit the bill.
- My analysis suggests a possible 37 cars could be owned by residents of Grange Paddock. Common-sense modelling based on this has been substituted for that of BRD Tech (which is inappropriately based in my view) to assess potential daily vehicle movements (VMs). Far from there being an "*imperceptible impact on the local road network*", as is claimed, a possible 20% uplift in VMs is estimated from Grange Paddock versus the daily average VMs recorded along Ickleton Road in July 2022. The nearby Ickleton Road may be mostly 6m in width but it has many 'pinch points' from parked cars and the predominance of the incremental traffic from Grange Paddock would be likely to head west along it.
- Biodiversity loss is not quantified but must be unavoidable, especially as 29 trees (mostly mature) are felled for the new access road – Chainsaw Alley. These include 10 ash trees that are classified in the Arboricultural Impact Assessment as being in 'normal' physical condition, despite die-back becoming widespread nationally and an issue for this species.
- There is distinct vagueness regarding the Affordable Housing 'offer' for 7 houses. Would these happen in practice? The service charge could also be a barrier here and that for a nearby new development at Newport (documented within) has been estimated by joint marketing agent Savills at circa £452 per annum.
- Grange Paddock could open the floodgates for development in Elmdon, decimating a village that has evolved largely via infill over many decades. Sanctioning this highly speculative development would be less a case of the dam being breached and more one of the dam wall being blown up overnight.
- A possible scorecard is provided, based on the NPPF's 3 key assessment metrics. Even allowing for the crucial 'tilted balance' stance, it looks as if there is nothing to commend this site other than its minute (0.00006%) contribution to the UK's targeted 300,000 per annum new houses. Sanctioning Grange Paddock would, in short, come at a heavy cost in terms of the scorecard, with next to no benefits.
- Revisions to the NPPF that are pending need to be taken into account. These include more account of localism and a shift away from rigid land supply targets.
- In view of the numerous factually inaccurate and misleading statements by the applicants, a site visit by the Inspector is requested if possible.

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Opening Remarks

Three brief points:

1. I first moved to Elmdon in 1986. Having previously lived in owned properties in Cambridge (in the 1970s) and Linton in Cambridgeshire (in the early 1980s), I therefore have a well-developed knowledge of the village setting and surrounding area reinforced by frequent local walks.
2. In my view, there have been a number of erroneous and/or misleading statements within parts of the submissions accompanying this planning application. This is relevant for example as regards the Transport Statement and for The Design & Access, Heritage, Landscape and Planning Statement. An evident example is that Elmdon seemingly enjoys a pub as a facility, when in reality the tenth anniversary of its closure is mere weeks away, with no signs of an imminent re-opening!¹ One assumes here that there was no opportunity for proof-reading of the documents by the applicants.² There is also what I regard as highly distorting commentary on matters such as bus services, prior community consultation and the claimed lack of “*major visual effects expected from the development*”.³
3. Omissions also feature with regard to the submissions. There is for instance: zero mention of: the ancient Icknield Way passing through Elmdon and providing panoramic vistas of this elevated site that is set in the open countryside; the existing large recreational field;⁴ the fact that the unmade path on some plans no longer exists and is irrelevant for the application being promoted;⁵ or of the planned reforms to the NPPF, where implementation is, in theory, feasible ahead of the Planning Inspectorate’s target decision date of 16th May. A very detailed and still recent Village Design Statement (VDS),⁶ conducted after extensive consultations of parish inhabitants receives no mention whatsoever and looks to have been completely ignored. In view of these factors, it is requested that a site visit is undertaken by the Planning Inspector if at all feasible – a danger implicit in the S62A approach is that a remote appraisal of matters from Bristol could miss important issues. The considerable obfuscation that has occurred by the applicants heightens this risk in my view.

Inadequate Prior Consultation Concerns

Before submitting an application, the promoters of a development are supposed to engage with the community affected. Hence ‘National Planning Practice Guidance: Healthy & Safe Communities’, issued in 2019, favours such engagement pre-application as it aids efficiency via “*working collaboratively and openly with interested parties at an early stage to identify, understand and seek to resolve issues associated with a proposed development..*”. Similarly, the NPPF, issued in 2021, noted how plans should “*be shaped by early, proportionate, and effective engagement between plan-makers and communities....*”⁷. It continued by stressing how “*The more issues that can be resolved at pre-application stage, including the need to deliver improvements in infrastructure and affordable housing, the greater the benefits*”.⁸

¹ This supposed village facility is cited on page 8 of the Transport Statement.

² Both have lived in the village for years and are well aware of the pub’s history. Indeed, the pub featured in the first incarnation of the scheming for this site in 2015 a new and larger Village Hall was to be provided as a community facility as part of the quid pro quo for building 30 houses, with Robert Smith to purchase the pub to achieve this.

³ Cited in Paragraph 4.20 of the Design & Access, Heritage, Landscape & Planning Statement.

⁴ Where the lease has just been renewed for another 7 years

⁵ It has confused many villagers and appears to suggest a pedestrian access to the proposed development

⁶ This VDS for Elmdon, Duddenhoe End and surrounding hamlets was adopted by UDC as ‘Council Approved Guidance for the purposes of Development Management and Planning Policy’ on 13th June 2019

⁷ Cited on page 8

⁸ Cited on page 13

A meeting was arranged by the applicants on Friday 17th June 2022 at Elmdon Village Hall. This took place from 4.30-7.30pm and a number of criticisms can be levied:

- Notice of the above meeting was very poor: some believe that the few posters advertising matters on telegraph poles in the village only appeared on the 15th of June.
- There was apparently a brief formal presentation at the start but it was not advertised that there would be one (see Appendix A). Anyone arriving after this found a schematic map was spread on each of two tables within the Village Hall. The plan promoters fielded questions as residents jostled within this small village facility⁹ to view and more fully comprehend the ‘plans’ at first take. [I have spoken to one villager who would like to have attended but did not enter the Village Hall when she saw how crowded it was].
- No record was taken of who attended, and there was no opportunity to leave a written comment. It was all a notional consultation and probably, in my view, a pure box-ticking exercise.
- A total radio silence then ensued, other than for the reporting within the Elmdon Gazette¹⁰ of a survey result initiated by the Elmdon Community Group (ECG) on the plans; this led to 90.7% of respondents expressing opposition, whilst “*objections came from the whole village and not just from those living adjacent to the site*”. We understand Elmdon Parish Council was informed by the applicants that: material would be placed on the Internet as part of a follow-up process (presumably on the village website); that more village presentations would occur; and that concerned households along Ickleton Road would enjoy one-to-one visits to explain matters better.¹¹ In all instances, this was not the case.

In essence, the promoters of the Elmdon scheme (advertised as “*A plan for increasing village amenities and housing opportunities*”) presented: a vague scheme; ensured many villagers missed the event due to the very short notice; and often left those that did attend rather in the dark on some key issues. However, as per the Statement of Community Engagement of December 2022 the applicant has “*enthusiastically sought to work with the residents of Elmdon to develop the details of this application*” prior to its submission.¹² Contrast too how the questionnaire (that led to the ECG survey result noted above) included within its summary of the proposed development “*Affordable Provision: not detailed at present*”, whereas the Statement of Community Engagement remarks that “*affordable housing was very much supported and welcomed as part of the proposals*”.¹³

To return to the NPPF, it is indicated how: “*Applicants should work closely with those affected by their proposals to evolve designs that take account of the views of the community*”.¹⁴ The ‘take’ on events of this evolution process in my household was thus:

⁹ As per [REDACTED] the interior dimensions are 4.9m x 7.9m

¹⁰ The September 2022 issue that can be secured via [REDACTED]

¹¹ This was detailed at the Elmdon Parish Council EGM of 2nd March 2023 that was widely attended and ended with a near unanimous show of hands against this proposed development –there was 1 person in favour

¹² Indicated in Paragraph 1.8 of the December 2022 Statement of Community Engagement

¹³ Indicated in Paragraph 3.1 of the above

¹⁴ Cited in 1.3 of the Statement of Community Engagement of December 2022 based on paragraph 132 of the NPPF

Then and now my personal experience of the evolution process

Variable	June 2022	As disclosed by the 16/2/23 application	Was this evolution expected?
Communal facilities.	Tennis court & playground.	Kids playground.	NO
Pedestrian access to communal facilities.	Via a path from the access road coming from Farm Drive and another off the internal loop road.	Via a single footpath starting at the verge of Ickleton Road and travelling to the north-west part of the site.	NO
Aggregate bedrooms.	72	64	NO
Aggregate square feet of properties proposed.	31,997	30,138	NO
Access road.	Off Farm Drive to the west.	Off Ickleton Road to the west at the existing entrance to Alfreds Shott.	NO ¹⁵
Extensive tree felling.	N/r	Linked to the change of access route.	NO
Affordable housing.	No personal recollections of any being mentioned. ¹⁶	Application is for 18 market housing units but willing to consider 7 for affordable housing.	NO
Services.	Not to be connected to the mains drainage but self-treating via an on-site treatment works with water run-off.	To “utilise existing mains services available from Ickleton Road.” ¹⁷	NO

The Prior VDS Has Been Ignored By The Applicants

There was extensive consultation and village participation here (see Appendix B). Every household was given a copy and the flyer with it even requested that if the householder moved it was passed on to the next owner/occupier of the property. The following key points should be observed with regard to expressed residents’ views on housing following a questionnaire-based survey undertaken:

- 50% felt that the amount of building in the parish had been “*about right*”.¹⁸
- There was limited support for building on greenfield sites and for infill or backland development.¹⁹ It was felt that new building should be on previously developed sites and 90% supported the idea of converting redundant buildings into houses.
- The “*overwhelming message*” was that what residents saw as being needed was “*small 2 or 3 bed homes (74%)*”.²⁰
- New developments needed to respect and avoid any harm to both historic buildings and their setting.²¹

The findings of this VDS have not been respected and a return is made to this matter later.

¹⁵ This may be harsh – seemingly there was widespread concern expressed by some villagers about the original site entrance

¹⁶ We were in Cambridge that day and hurried back to make this short notice presentation. As we were not present for the entire 3 hours, we only heard some of the conversations and missed the formal presentation and Q&A process then. As the Queen famously said, “recollections may differ” on what was said and there is no record to consult

¹⁷ Paragraph 4.83 of the Design & Access, Heritage, Landscape and Planning Statement of December 2022

¹⁸ Cited on page 20

¹⁹ Cited on page 21

²⁰ Page 21 again

²¹ Cited on page 24

Landscape Heritage Concerns

The highly regarded ‘Landscape Character Assessment’ of Chris Blandford Associates (published in September 2006) mentioned the general merits of the Chalk Upland Landscapes²². It later²³ dealt specifically with the (thus-designated) Elmdon Chalk Upland. Characteristics of the latter including: *“Rolling chalk upland landscapes of broad ridges and panoramic vistas that contrast with winding sunken lanes.....”*; a *“sense of space and openness”*; plus *“scattered manors and moats and dispersed historic settlements”*; and a *“rich cultural heritage of vernacular architecture”*. Overall this is a *“landscape of big sky and seemingly continuous views on the higher ground”*. This is what makes Elmdon so special and so highly attractive to both resident and non-resident walkers, cyclists and horse riders. It is also noteworthy that:

- Elmdon is blessed by a rich building and landscape heritage. As regards the former, the VDS noted how the Conservation Area contains 37 listed buildings or groups of buildings, most being Grade II.²⁴ These include ‘The Hoops’ on Ickleton Road directly opposite the proposed development. The historic setting of this property (a former beer-selling establishment but never a pub as such) would be unavoidably impacted. There are 63 Listed Buildings or groups of Listed Buildings overall.
- There are eight lanes with protected status in the parishes of Elmdon and Wendens Loft, including Quickset Road heading out towards Ickleton.
- Elmdon has one of 36 Conservation Areas in Uttlesford.²⁵ These being defined as *“areas of special architectural or historic interest, the character or appearance of which it is desirable to conserve or enhance”*.
- Elmdon possesses 4 Ancient Monument sites (2 within the Conservation Area) as well as Ancient Woodland and 3 County Wildlife sites.²⁶
- Elmdon residents and visitors enjoy access to a number of rights of way, with the bridleway linking Ickleton Road and the road along to Freewood Farm (part of the ancient Icknield Way) one of the most regularly used. With the proposed site being elevated, it is highly prominent (across the valley) for many tens of metres when heading downhill along this bridleway towards Elmdon. Development of this site would therefore impact visually on this walk, replacing land grazed by ponies with 18 new-builds, an access road and residents’ car parking. This footpath also features a tremendous landscape ‘sweep’ that includes the Church and the other historic (often listed) buildings near it²⁷. The intrusion of this proposed development into open countryside and the views from the rights of ways is of such importance that I explore this further later on.

²² See page 29

²³ See pp 328-330

²⁴ The VDS secured its numbers from the ‘Elmdon Conservation Area Appraisal and Management Proposals’ approved by UDC in December 2014. Most of the 37 are Grade II

²⁵ The ‘Elmdon Conservation Area’ etc document again

²⁶ As above

²⁷ There is a panoramic photograph displayed in the Village Hall

The Historic Position As Regards Planning

This planning application would have been unlikely had UDC not been placed in Special Measures.²⁸ The pattern for decades was for UDC to channel development towards: a) the urban areas of Great Dunmow, Saffron Walden and Stansted; b) the A120 corridor; and c) to selected key rural settlements, namely Elsenham, Great Chesterford, Newport, Takeley and Thaxted all located on main transport networks and offering local employment opportunities. This was all formalised in the 2005 Local Plan (LP), the last to be issued. Whilst the new LP is still being redrafted, and whilst accepting that it is indeed ‘long in the tooth’, it seems reasonable to assume that many elements will nevertheless be retained in the new LP due to be drafted by this December, a point endorsed by the Planning Inspector’s recent appeal dismissal for 9 houses at ‘The Grange’ at Clavering. Sustainability also remains a vital issue within the NPPF.

The 2005 LP alluded to other smaller villages²⁹ where the onus is on infilling only due to the lack of local facilities/services. It was cited as regarded these smaller villages, that “*where these have development limits, these boundaries will be drawn tightly*”.³⁰ Even infilling must be development “*compatible with the character of the settlement and, depending on the location of the site, its countryside setting*”.³¹ The ‘Sustainability Appraisal for the Uttlesford Local Plan Scoping Report’ produced for UDC and published in August 2021 cited how “*smaller settlements lie within an identified ‘rural restraint’ area*”.³² Suggestive that this will be recognised when a new LP finally emerges.

The above is mentioned as there is a need to be aware – entirely missing from the supportive ‘bumpf’ for this planning application - of how:

- Elmdon is a classic ‘tucked away’ village. The Jean Robin book (‘Elmdon: Continuity and change in a north-west Essex village 1861-1964’, published in 1980)³³ noted in its foreword how the ridge villages (of Strethall, Elmdon, Chrishall, Heydon and the two Chishills) “*have remained curiously isolated...Elmdon lies in the middle of a cluster of villages linked by second-class roads and lanes....The village is not on the direct route to anywhere*”.
- Historically, Elmdon was a squire-dominated village: the above book focused on the Wilkes family and the growth in their estate from 1739-1927.³⁴ Growth which meant that by the mid 19th Century circa 50% of the farmland cottages in Elmdon were owned by the Wilkes family – a key factor in 115 households in Elmdon in 1861 numbering a barely changed 114 in 1964. Some would say this fossilised the village, others that it gives it its unique character.
- Services/facilities in Elmdon have diminished massively in recent years and indeed since the finalisation of the 2005 LP. The school closed in 1973; the butcher’s shop & yard (now Elm Court) in the late 1970’s; the shop & Post Office in the mid-1990s; and the final pub in 2013 (two others closed in 1963 and 1972). The Church – for those still participating – is now a part-time offering, with one service per month.³⁵ It remains the case that no mains gas supply exists, plus there is only the 444 bus during school term time, timed to fit in with school hours for pupils attending schools in Newport or Saffron Walden. There was also for many years a resident policeman in the village – the 1985 Pathfinder 1050 series OS map³⁶ still shows ‘Pol Office’ marked for Elmdon. The Jean Robin book cited (published in 1980)

²⁸ With effect from February 2022

²⁹ The list on page 35 included Elmdon

³⁰ Page 7 of the LP

³¹ Page 35 again

³² Mentioned on page 7

³³ She was a geographer at the University of Cambridge which is one of the premier establishments in the UK for this discipline. Her book collated and expanded on materials collected by students from the Department of Social Anthropology at the University of Cambridge. It is the definitive history of Elmdon

³⁴ An estate developed originally from a fortune made from the London gin trade

³⁵ There is a reason why the local ‘Village Web’ church magazine for Elmdon cites it is part of ‘The Parish of the Icknield Way Villages’. These being 7 in numbers Elmdon; Duddenhoe End; Great Chishill; Little Chishill; Chrishall; Heydon; and Strethall. A vicar sharing exercise

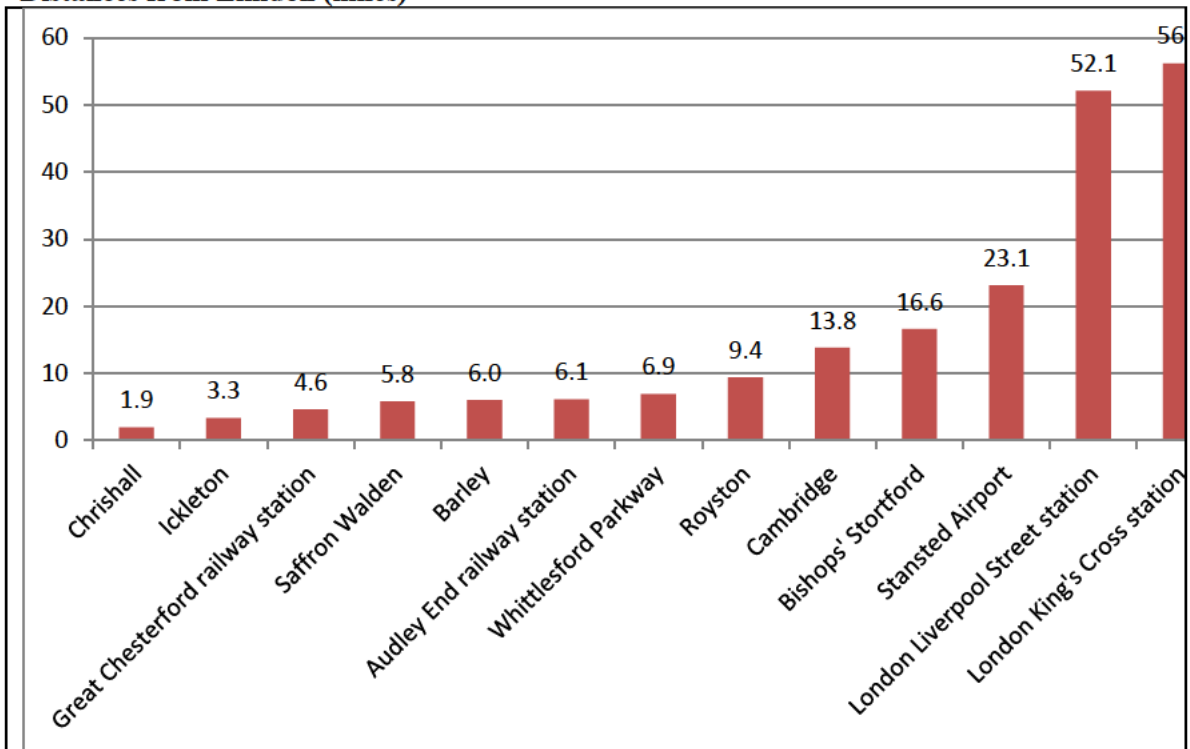
³⁶ The TL 43/45 one for Saffron Walden which is 2.5 inches= 1 mile

contained a Foreword describing Ickleton Road then and mentioning “the police station”³⁷ but the precise date of its closure is unclear. However, we understand from conversations with a longstanding inhabitant of No.3 Ickleton Road (next door to No.4, the former police house), that this was circa 20 years ago. The loss of a village ‘bobby’ is just one more local service/facility that has disappeared.

- Historically, Elmdon has had tightly prescribed development limits (the map of these appeared in the Appendix to the 2005 LP). None of the proposed development site lies within these mapped development limits.

A chart to demonstrate the above ‘tucked away’ aspect is provided next. Note the distance to Ickleton, where the only significant and frequent number 7 and number 31 bus routes operate. These (misleadingly) appear to operate from Elmdon as per the December 2022 Transport Statement.³⁸ The Audley End railway station is the key one: that at Great Chesterford has no facilities; no dedicated station car parking (it is necessary to park on nearby roads); is ‘up line’ for anyone travelling into London; and offers slower ‘stopper’ trains. Audley End by contrast has a shop, facilities such as toilets and a car park of 675³⁹ spaces.⁴⁰ It is one of the busiest destinations in this locality in weekdays.

Distances from Elmdon (miles)⁴¹



The “curiously isolated” nature of Elmdon, as per the Jean Robin book had a proven planning ramification for one of the applicants quite recently. As part of the route to secure ‘The Grange’⁴² in which his family now lives, Robert Smith initially sought to develop a redundant grain store secured as part of the Elmdonbury Estate purchase.⁴³ A planning application for a house was

³⁷ See xxii of this Foreword

³⁸ See page 8

³⁹ All detailed on the Great Anglian website as are the absent facilities at Great Chesterford

⁴⁰ The Transport Statement fails to even mention Audley End, merely highlighting Great Chesterford station which has severe limitations unless one lives within easy walking distance of it

⁴¹ As per the AA mileage calculator, with distances taken from CB11 4GR (Grange Paddock). Google map distances appear to vary slightly but the AA has been used throughout for consistency

⁴² This handsome house which retains the barrel roofing of the original grain store is now a very prominent feature of the landscape from the top of Hollow Road as one heads towards the Ickleton Way intersection. It was completed in late 2019

⁴³ This comprised the large period house known as Elmdonbury (historically owned by the Wilkes squires) and 348 acres (as per the Bidwell sale particulars of May 2004)

initially refused by UDC.⁴⁴ The application was then changed to B1 offices and passed by UDC.⁴⁵ These potential offices were then advertised,⁴⁶ but with zero interest seen; this was on account of the site and/or village's locational disadvantages versus more conveniently positioned alternative options.⁴⁷ A change of use to residential request followed and was duly approved by UDC.⁴⁸ There are lessons to be taken onboard from this sequence which have relevance for this site application.

Greenfield Development Concerns

All planning policies stress the need for development to be on brownfield sites wherever possible to restrict the loss of valuable farmland. The 'Homes England Strategic Plan 2018/19-2022/23' issued in 2018 noted how "*there are 26,000 hectares of brownfield land available, with capacity for one million homes*", plus "*central & local government owns surplus land with capacity for over 160,000 homes*". This desirability to conserve good quality farmland - very rightly - continues through to the present day, with the latest consultation on proposed changes to the NPPF in England⁴⁹ reaffirming how there is the need to protect the best and most versatile (or BMV) agricultural land, i.e. Grades 1-3a.⁵⁰

The Elmdon site proposed (2.26 hectares, or c. 5.6 acres) is 100% greenfield agricultural land, all as noted outside the village development limits. Currently used for grazing, it was historically long used for crop production. The planning submission mentions⁵¹ how as per the Natural England Agricultural Land Classification Map (Eastern Region) it is Grade 2 in status. This is based on the very longstanding and widely accepted MAFF⁵² Agricultural Land Classification of England & Wales summarised in the Table below. Grade 2 is highlighted in bold:

The longstanding land classification grades

Grade	Attributes
Grade 1	Excellent quality land with no/very minor limitations for agricultural use and capable of growing a very wide range of agricultural and horticultural crops.
Grade 2	Very good quality land with only minor limitations that affect crop yield, cultivations or harvesting. A wide range of agricultural and horticultural crops can usually be grown but with yields lower/more variable versus for Grade 1.
Grade 3	Good to moderate quality agricultural land with moderate limitations that affect the choice of crops, timing and type of cultivation, harvesting of level of yields. Split as to:
<i>Grade 3a</i>	<i>Good quality agricultural land capable of consistently producing moderate to high yields of a wide range of crops including cereals, grass, oilseed rape, potatoes, sugar beet and less demanding horticultural crops.</i>
<i>Grade 3b</i>	<i>Moderate quality agricultural land able to produce: moderate yields of a narrow range of crops, principally cereals and grass; or lower yields of a wider range of crops; or high yields of grass for most of the year.</i>
Grade 4	Poor quality land with severe limitations that restrict crop range and/or yield levels.
Grade 5	Very poor quality land suffering very severe limitations such that use is mainly restricted to permanent pasture or rough grazing.

The 2005 LP detailed how 80% of Uttlesford land is classified as Grade 2, plus there is some Grade 3a land, and: "*This represents the best and most versatile farmland. Such land should be avoided for development unless sustainability considerations suggest otherwise*". Policy ENV 5 on Protection of Agricultural Land in this LP stated that: "*Where development of agricultural*

⁴⁴ UTT/1007/10/CP it was refused as it was outside the village development limit

⁴⁵ UTT/2562/11/FUL of 17th February 2012

⁴⁶ I believe this was done via Cheffins over a period of 18 months

⁴⁷ The lack of much by way of a potential workforce in the village may also have played a role

⁴⁸ UTT/13/0911/FUL of 27th June 2013

⁴⁹ The Levelling-up and Regeneration Bill reforms to national planning policy, 22 December 2022

⁵⁰ Cited in part 10 of Chapter 7 of the above

⁵¹ Cited in section 2.5 of the Design & Access, Heritage, Landscape & Planning Statement

⁵² The Ministry of Agriculture, Food & Fisheries that preceded the current Defra; this classification was issued in October 1988

land is required, developers should seek to use areas of poorer quality except where other sustainability considerations suggest otherwise". We see no evidence from the planning submission of any consideration of other site options, even though one of the applicants is an extremely large land owner.⁵³

The VDS for Elmdon, Duddenhoe End and surrounding hamlets cited earlier made it very clear⁵⁴ how residents felt strongly that *"new building should be on previously developed sites"*, i.e. good quality agricultural land should not be concreted over and lost forever.

Events in Ukraine have also provided a wake-up call for the UK's poor food self-sufficiency levels following a period of marked population growth. The 'UK Food Security Report' issued by Defra on 16 December 2021 noted how the global population is forecast to rise from 7.7bn in 2021 to 8.5bn in 2030 and how in 2020 the UK imported 46% of the food it consumed. The UK produces 54% of its fresh vegetables but just 16% of its fruit. In June 2022 Defra issued a 'Food Strategy' report commenting how *"successful domestic production is what gives us national resilience in an uncertain world. Those countries that are entirely dependent on imports for their food supplies tend to be characterised by less choice and higher prices"*. The report also indicated that the UK produces only 23% of the cucumbers and 15% of the tomatoes used domestically. As has been historically well-documented, U-boat operations in both WW1 and WW2 virtually crippled the UK and led to severe limitations on food imports and rationing. Recently, the poor weather⁵⁵ in Holland, Morocco and Spain has manifested itself in shortages of cucumbers, lettuce and tomatoes on many supermarket shelves, highlighting once more the potential perils of simply assuming that food imports can always be secured. These shortages, expected to persist for months, have led the National Farmers Union to cite how Britain is at risk of *"sleepwalking"* into a food crisis.⁵⁶

A recent letter in the media expressed concerns regarding the destruction of prime agricultural land citing Farmers Weekly magazine data on how in 1984 the UK was 95% self-sufficient in indigenous food production and 78% self-sufficient in all foods. By 2009, these numbers were respectively 78% and 59%.⁵⁷

Additional points regarding the Elmdon site in passing:

- The planning submissions allude in many instances to it being *"undeveloped land"* and it is a long way into the documentation before a mention is even made of it being Grade 2. In my view, this clearly conveys the attitude of the applicants towards the land which has been the source of much scheming for some years. Unsettling scheming for most of the villagers.
- Whilst 5.6 acres might seem a small site, it is both large and highly prominent in the context of Elmdon given that it runs parallel to many properties along the Ickleton Road with the land rising from south to north. The Topographical Survey pinpoints how close to No.4 Elm Court the Ickleton Road is at a height of 100.73 metres, with the site attaining 109.87 metres at the top hedge and 108.70 metres for where there could be houses: for the latter a height rise of 7.97 metres or c. 26.6 feet. This will lead to a dominating aspect to what would be an urban housing estate inserted into open countryside. Much of the site is visible for a long stretch of the historic Icknield Way as it progresses towards Freewood Farm and then later (through a thin hawthorn hedge) before it heads on towards Strethall.

⁵³ 2,800+ acres per the website of Russell Smith Farms, although some will be in Cambridgeshire and Hertfordshire as well as Essex

⁵⁴ Page 21

⁵⁵ High fertiliser and energy input costs have also impacted including their effects on UK heated greenhouse sowings some of which have been delayed until temperatures rise. Glass farming has been excluded from an energy support scheme

⁵⁶ Cited in the Daily Telegraph on 21st February 2023

⁵⁷ Cited in a 27th February letter printed in the Daily Telegraph

- There have to be concerns at further ‘chipping away of’ and loss of additional BMV land within Elmdon if this site is approved. Yes, the official reaction will be that every site requires an application that will be duly appraised, but a precedent will have been established that will be seized upon with vigour. It does not tax the imagination too that just a few years down the road an infill application follows contiguous to this housing (on the western side) arguing that the community kids park facility is little used by villagers so more houses might as well follow....
- There is no planning history for the site but the entire site was until the early years of this century part of a far larger field that continually grew agricultural crops. A point that the writer of the Planning Statement appears oblivious to with the comment that “*the application site does not form part of a ‘large-scale rectilinear field pattern’ owing to its much smaller size in relation to these more substantial parcels of arable land*”.⁵⁸ The Bidwell sale particulars of 2004 highlighted the soils as “*predominantly of the Swaffham Prior soil association described as being well drained calcareous coarse and fine loamy sols over chalk, suitable for the growing of cereals, sugar beet and potatoes...*”⁵⁹
- It is also worthy of note in passing that this site was submitted in 2018 as part of UDC’s ‘call for sites’ but was dismissed as unsuitable.⁶⁰
- The (larger) part of the site on which it is proposed to position the 18 houses and revised access route has seen some interesting history, which indicates both applicants have substantial vested interests (rather than mainly one). The position here is that when the Elmdonbury Estate was sold in 2004 it was advertised to be sold as a whole or in 10 lots. Lot 8 comprised c. 2.3 hectares and consisted of “*land on the edge of the village with separate amenity value or long term development potential*”.⁶¹ Whilst virtually the entire estate was acquired by Robert Smith, a sub-sale was rapidly enacted in respect of Lot 8,⁶² with restrictive covenants attached.⁶³ One would imagine these could have included land use stipulations and prevention of the land from being developed lest someone else profited. Under such a scenario, it is likely that the current owners of Alfreds Shott (since 2009) and Robert Smith would have agreed to set aside any such restriction(s). Hence too perhaps why this application has been made via Rocol Estates Ltd.⁶⁴

Sustainability Concerns

Any development in Elmdon would necessarily result in the new residents making extensive use of cars to travel outwards for work, food and to access medical, shopping etc facilities. Employment opportunities and facilities within Elmdon are severely limited (zero for most professions), with no regular public transport. [Agricultural work, the traditional mainstay of many up until the early 1960s,⁶⁵ now employs comparatively few in Elmdon: horsepower in the form of vastly more powerful (and larger) tractors, spray booms, combines etc has been substituted for manpower:⁶⁶ Capital for labour as economists would define matters]. All planning legislation seeks to direct development towards locations where vehicle use would

⁵⁸ Paragraph 4.17 of the Design & Access, Heritage, Landscape & Planning Statement

⁵⁹ Cited on page 15

⁶⁰ This was referred to by Elmdon Parish Council at an EGM held to discuss Grange Paddock on 2nd March 2023

⁶¹ It had a guide price of £70,000 as per the Bidwells sales particulars

⁶² Seemingly on 19th November 2004

⁶³ Cited in the Official copy of register of title any member of the public can secure from HM Land Registry

⁶⁴ The name derives from the Ro of Robert and the Col of College Farms, Duxford, the base of Russell Farms. 10-15 years or so ago we can recall that Rocol Estates had its own website detailing house building sites it had been involved in within the locality such as at Barley and Duxford but this website has vanished. Probably as Rocol Estates looks to have become semi-dormant, with net assets of only £19,544 as of the last Accounts at end December 2021. The creation of the smithsonhill joint venture may have influenced this dormancy

⁶⁵ See again the authoritative Jean Robin study. Table 3 on page 11 details how 135 persons were designated as farmers/farm employees as per the 1861 Census but a 1964 survey for those who lived and worked in the parish of Elmdon gave a figure of 34. This would now be sharply lower still

⁶⁶ For instance, the Wombwell family at nearby Rectory Farm were farming 3,000+ acres at the start of 2022 reflecting many 70+ hour working weeks during harvest time for this hard working father and two sons enterprise who regularly provide farming updates within the village Gazette. 1,000+ acres per person – way above the ratio commonplace 50 years ago

be lessened through residents being able to walk/cycle/use public transport to access work and facilities.

Proving the above limited village employment options, the 2021 ‘Sustainability Appraisal for the Uttlesford Local Plan Scoping Report’ included⁶⁷ a map of job density for Uttlesford. Elmdon was in the lowest level of 0-2 employees/hectare (versus the highest level of 23-62 employees/hectare). It also noted⁶⁸ how development should “*promote the use of healthier modes of travel*” and should “*reduce the number of journeys made by polluting vehicles*”.⁶⁹ ‘Essex Design Guide’, published in 2018, similarly cited how developers “*should encourage walking and cycling*” and “*discourage the use of the private car*”. The recent consultation on planned reforms to the NPPF observed that there is a need to “*locate more homes in sustainable urban locations where development can help to reduce the need to travel (thereby supporting sustainable patterns of development overall)*”.⁷⁰ In ‘Decarbonising Transport: Setting the Challenge’, issued by the Department of Transport in 2020, mention was made⁷¹ of how “*transport is now the largest contributor to UK domestic GHG⁷² emissions, contributing 28%.....in 2018*”. Whilst within transport, road transport is the largest contributor, with cars responsible for 55% of domestic transport emissions in 2018. As was also stated then, “*Cycling and walking are the ultimate forms of zero GHG emission transports*”.⁷³

Recent changes to Permitted Development Rights are now enabling redundant shops and offices in towns or cities to be converted into residential housing. Development that is far more sustainable than any scheme in Elmdon can ever be. Due to Elmdon’s relative remoteness and rural nature, car reliance for this site would be such that it simply cannot be deemed sustainable. Very few, if any, London commuters for instance will be prepared for an aggregate 10+ miles cycle to the key station at Audley End before and after a day’s work, especially in the depths of winter. The NPPF document remarked how “*all plans should promote a sustainable pattern of development*”.⁷⁴ The UDC ‘Housing Strategy 2021-2026’ issued in October 2021 made the evident point that: “*Emissions from transport can be influenced by where housing is located in relation to workplace.....facilities and amenities,*”⁷⁵ in which case it is equally self-evident that Elmdon is a singularly poor and unsustainable location. In my opinion, this is indicative of the highly speculative nature of this development proposal.

The promoters of the Elmdon development admitted verbally last June⁷⁶ to a possible 42 residents cars resulting from the 18 houses added to the village. The text of the submission documents is silent on this point as regards expectations but indicates that legally 41 car parking spaces were necessary (36 for inhabitants of the proposed development with the balance of 5 being for visitors).⁷⁷ The planning application form details 49 as being the intended overall provision – a telling difference. So how many residents’ cars might arise in practice? A necessary start comes from observing the slight changes to the housing types giving rise to fewer 4 and 5 bedrooms units:

⁶⁷ See page 32

⁶⁸ See page 47

⁶⁹ See page 93

⁷⁰ Part 14 of Chapter 4 of the 22nd December 2022 ‘Levelling-up and Regeneration Bill’ reforms to national planning policy’

⁷¹ Cited on page 10

⁷² GHG = greenhouse gases

⁷³ Cited on page 34

⁷⁴ See page 6 of the 2021 publication that replaced the February 2019 version

⁷⁵ Cited on page 38

⁷⁶ At the Village Hall meeting noted

⁷⁷ Based on the stipulation of 2 spaces per 2 bedroom or larger dwelling plus 0.25 spaces per dwelling for visitors rounded up to the nearest whole number

Housing types indicated

<i>As per June 2022:</i>				
Type	Number of bedrooms	Number of units	Sub-totals in square metres for type	Sub-totals in square feet for type
Type 1	2 bedroom bungalow.	1	85	915
Type 2	3 bedroom semi-detached.	6	558	6,006
Type 3	4 bedroom link detached.	1	160	1,722
Type 4	4 bedroom detached.	2	290	3,120
Type 5	5 bedroom detached.	4	720	7,748
Type 6	5 bedroom detached.	2	600	6,460
Type 7	5 bedroom detached.	2	560	6,026
Total	72	18	2,973	31,997
<i>As per 16th February 2023:</i>				
Type 1	2 bedroom bungalow.	1	85	915
Type 2	3 bedroom semi-detached.	6	558	6,006
Type 3	2 bedroom semi-detached.	2	166	1,800
Type 4	4 bedroom detached.	2	290	3,120
Type 5	4 bedroom detached.	3	540	5,811
Type 6	5 bedroom detached.	2	600	6,460
Type 7	5 bedroom detached.	2	560	6,026
Total		18	2,799	30,138

One can then take note of the 2011 Census data within the VDS citing how 252 households for Elmdon, Duddenhoe End and surrounding hamlets (Wenden Lofts and Pond Street) out of 269 (93.7%) had a car.⁷⁸ The VDS also disclosed that as per this 2011 Census data 29% had 1 car, 43% 2 cars, 14% 3 cars and 7.5% 4 cars or more. In the next Table I have made use of this data to extrapolate that there could easily be circa 37 residents' cars if this scheme proceeds. It has been assumed that all incoming residents have cars on the grounds that they would be relatively affluent – the revised scheme still mainly comprises 3-5 bedroom houses plus a bungalow that would appeal to a well-off pensioner household. As a result, I have a) reassigned the 6.3% 'no cars' element and b), have presumed a slightly higher weighting for 2 to 4 or more car households in the modelling:

⁷⁸ Page 6 of the VDS

Modelling for likely residents cars

Cars/household as per 2011 Census	% splits for lhs column	Adjusted % splits for lhs column	Weighted units derived	Cars multiplying effect	Resident cars result
1	29.1	29.0	5.2	1	5.2
2	43.1	47.2	8.5	2	17.0
3	14.0	15.5	2.8	3	8.4
4	7.5	8.3	1.5	4	6.0
0	6.3	0.0	n/r	n/r	n/r
	100.0	100.0	18.0		36.6 = c.37

Adding in visitors, it would be heavily odds-on that at numerous points in the year (such as most week-ends and during public holidays) there could be 40+ cars parked at Grange Paddock and there could easily be times with 45+ present. All would necessarily enter/exit from the new access proposed onto Ickleton Road. The residents' number of 37 used above is inherently conservative as no allowance has been made for how some households as per the 2011 Census cited in the VDS clearly had 4+ cars. As was noted in this publication, "*Car ownership is high and consequently there is considerable movement in and out of the parish by car*". Aggregate incremental daily vehicle movements from this proposed site would obviously be boosted from: 'outbound' then 'inbound' journeys of residents for work, to access health facilities, shopping etc; plus visits by trades people, Amazon (or similar) delivery drivers etc. More on this matter later.

The December 2022 Transport Statement accompanying this planning submission was written by BRD Tech Ltd based at Sawbridgeworth, 22.6 miles away,⁷⁹ and this shows: in my view, this report contains both glaring errors and misleading statements. These are now examined, starting with Elmdon's facilities where the following comments appear:

"Elmdon village provides a few limited facilities, including bus stops, a church, a pub, a childminder, and a village. Further facilities are available at Ickleton and Great Chesterford, circa 5km and 6.5km from the site respectively, including a railway station, convenience store, doctor's surgery, bakery and recreational ground".⁸⁰

I have provided a Table below for the Planning Inspector to show the true reality of matters regarding facilities within Elmdon:

Elmdon's limited facilities

Facility as per BRD Tech	The reality	Comments
Bus stops	School pupils can catch the bus at the bottom of King Lane and on Ickleton Road but there are no formal signed stops.	In term times only.
The church	One service per month only.	The vicar rotates between a number of churches in the Benefice (7).
The pub	Closed in 2013 shortly after an event to celebrate St George's Day, the 23 rd April.	Fast approaching its 10 th anniversary of closure. Knocking on the door and asking for a pint is not recommended!
The childminder	Closed the business in 2017.	Suggests a lack of due diligence work as regards village facilities.

The BRD report curiously fails to mention that Elmdon has a (small) Village Hall plus its own recreational ground. The latter is an extremely large one,⁸¹ with a renowned cricket

⁷⁹ As per the AA mileage calculator

⁸⁰ Cited in paragraph 3.3 on page 8

⁸¹ I estimate it is c. 3.5 acres after pacing it and noting that 1 square yard = 0.0002661 acres

field.⁸² The recreational ground is also used for annual fetes and special events.⁸³ The cynic might feel its omission throughout the entire planning submissions may have had something to do with a desire to highlight the open spaces added from Grange Paddock (where it is anyway necessary to count in what would be private gardens to specify that “*around half of the site would.....be laid out as green open space*”).⁸⁴

Turning to bus services:

Paragraph 3.4 states: “*The nearest bus stop to the site is located circa 450 metres west of the site along Ickleton Road, giving access to the 444 bus service. To the east in Chrishall, the Pinkeneys bus stop can be accessed, providing access to both the 31 and 444 bus routes. To the northeast the Coploe Road bus stop can be accessed, providing broader interregional services including the 7, 101 and 132 routes*”. Points of note here:

- The 444 bus service on Ickleton Road provided by Stepsons is tailored to school children and runs in term times only. It is not an option for adults commuting to work etc. There is no designated bus stop as such either.
- Chrishall, as observed earlier, is 1.9 miles away by road. At an average 3.2 mph this would require a minimum walking time of c. 36 minutes before the bus could be accessed. Longer for those where age has deflated speed somewhat. There are shortcuts to Chrishall but these would be muddy for some of the year. Cycling to Chrishall would take ca. 15 minutes, but there is nowhere secure to leave valuable cycles. The 31 bus route from Chrishall offers only one bus to Cambridge (leaving at 07.08) and back (at 17.52). It is not a viable option for the vast majority of people seeking to get to work etc. from Elmdon.

Walking speeds

Age	Average walking speed in mph as per
20-29	3.0-3.04
30-39	3.0-3.2
40-49	3.11-3.2
50-59	2.93-3.2
60-69	2.77-3.0
70-79	2.53-2.82
80-89	2.10-2.17

- The Coploe Road bus stop mentioned is located in Ickleton, some 3.3 miles away, not in Elmdon as the BRD text suggests. Walking here would take circa 62 minutes at 3.2 mph and rather longer coming back given the lengthy hill and perhaps the carrying of any items purchased. Running there would seemingly take an average male circa 34 minutes, but again there is the small matter of the hill on return. Cycling again presents the problem of where to leave valuable equipment – the shop at Ickleton near the bus stop for the route 7 etc has a small cycle rack but this is intended for its customers. A fold-away bike to take on the bus such as the classic Brompton is an expensive purchase⁸⁵ and its small wheels are anyway best for urban environments.

⁸² A Best Kept Playing Field prize was devised for Essex in 1971 and is still running, with Elmdon winning the inaugural prize and again in 1974 and 1976-77

⁸³ Last June for instance saw a Platinum Jubilee events for the late Queen plus the enacting of an open air play and a mini Circus under a Big Top

⁸⁴ Cited in section 4.27 of the Design & Access, Heritage, Landscape & Planning Statement

⁸⁵ The cheapest looks to be £1,200+ and it is possible to pay far more

Running speeds

Sex	Distance	Average times per mile (1.6 km) in minutes as per [REDACTED]
Male	5km (3.1 miles)	10.18
Female	“ “	12.11
Male	10km (6.2 miles)	8.41
Female	“ “	10.02

- The Coploe stop bus takes 46 minutes to reach the centre of Cambridge on the first option at 9.14am so a lengthy overall journey would arise after adding in the travel element from Elmdon.
- The No. 101 service from Ickleton to Whittlesford is not available in the morning until 9.42am. The No. 7 service from Ickleton is a more regular one but it takes 61 minutes to reach the centre of Cambridge so the aggregate journey time from Elmdon would be a lengthy one: anyone with a car would simply drive there or would drive close to Cambridge to catch a ‘park & ride’ option.

The morale here is that Grange Paddock residents wishing to make Elmdon a sustainable place to live would either need to engage an amazing personal trainer or would need to be prepared to cycle in all weathers having fixed up prior arrangements for leaving their cycle somewhere safe. Far more probable for those with a firm green conscience is that car journeys would be made to Chrishall or Ickleton to drop off/pick up persons pursuing onwards public transport options. The vast majority of people however would – unthinkingly - simply jump into their cars for travel on to the ultimate destination!

As regards train services the services offered from the nearest station at Great Chesterford are indicated by BRD, along with the infrequent nature of the off-peak service, but it should be observed that:

- Whilst it is the nearest, the facilities at Great Chesterford are very limited and at 4.6 miles distance cycling would be the only option if car use from Elmdon were to be avoided. Cycle racks there number just 16.
- No commuter aiming for London⁸⁶ even considers heading for Great Chesterford. Instead Audley End station - 6.1 miles from Grange Paddock – is the immediate option. It has good facilities and some fast trains (that bypass Great Chesterford station when trains are heading south from Cambridge). It does have extensive cycle rack facilities (86) but with the rising ground on the route home, plus the distance concerned and the effects of dark mornings/evenings for some of the year, cycling is not a normal transport option for 99.9% of regular commuters.

The poor facilities at Great Chesterford versus Audley End are tabulated next.⁸⁷ The fastest inwards morning weekday journey time to London Liverpool Street is 76 minutes from Great Chesterford, compared to 52 minutes for Audley End.⁸⁸

⁸⁶ Which exerts a ‘pull’ factor for job options way in excess of that for Cambridge

⁸⁷ Based on the Great Anglian website and personal knowledge

⁸⁸ Source The Trainline data. 71 minutes applies for Great Chesterford at the late time of 9.04am

The two nearest railway stations compared

Facilities	Great station	Chesterford	Audley End station
Seated areas	YES		YES
Waiting room	NO		YES
Toilets	NO		YES
Baby changing facilities	NO		YES
Telephones	NO		YES
Wi-Fi	YES		YES
Post box	NO		YES
Shop	NO		YES
Car parking spaces at station	NO		675
Car park occupancy live feed on the website	NO		YES
Cycle racks	LIMITED (space for 16)		GOOD (space for 86)
CCTV	YES		YES
Part-time staff	YES		YES
Information systems	YES		YES
Abundant (if still costly) parking elsewhere	NO		YES

Now that it has been proven that public transport from Elmdon is the proverbial non-runner, let us consider the issues of vehicle movements and traffic levels along Ickleton Road from the Grange Paddock site. BRD Tech Ltd indicates⁸⁹ that the following would apply for a site where allowance has been made on the application for 49 car parking spaces inclusive of visitors:

Modified in presentation but all as per BRD

Period	Arrivals at Grange Paddock	Departures from Grange Paddock	Total vehicle movements
Peak am (8-9am)	4	7	11
Peak pm (5-6pm)	5	4	9

Hence as per BRD: *“This amount of proposed vehicle trips generated would equate to a vehicle trip approximately every 5-7 minutes and therefore would have an imperceptible impact on the local road network”*. However,

- An acronym I recall from university is GIGO, derived from computer science. It denotes ‘Garbage in, Garbage Out’, i.e. the result of a model is only as good as the starting inputs. In this case, BRD has decided to look at trip generation based on a database for Suburban or Edge of Town locations exclusive of Greater London. One might reasonably question the logic to this for a village location ‘out in the sticks.’ When one examines Appendix H, the list of sites used includes ones for dwellings located in the likes of Bournemouth, Bury St Edmunds, Peterborough, and Thetford. These dwelling sites should not have been selected in the first instance as the availability of public transport will be vastly superior to Elmdon, plus walking and cycling will be far more realistic options. As a result, vehicle movements (VMs) will record a deflating effect from readily available non-car options. In addition, at Suburban or Edge of Town dwelling sites the peak am and peak pm periods will tend to be far more marked – in a village such as Elmdon for the am slot for instance, there is more of a spread as: some inhabitants leave very early to be in the City for when financial markets open;⁹⁰ some leave far later on as whilst they work in London they enjoy far more flexibility over hours; and some leave relatively late on as they work in, say, Saffron Walden or are retired and generally enjoy a slower pace of life. In the afternoon/evening there is a return ‘ebb’ effect as workers

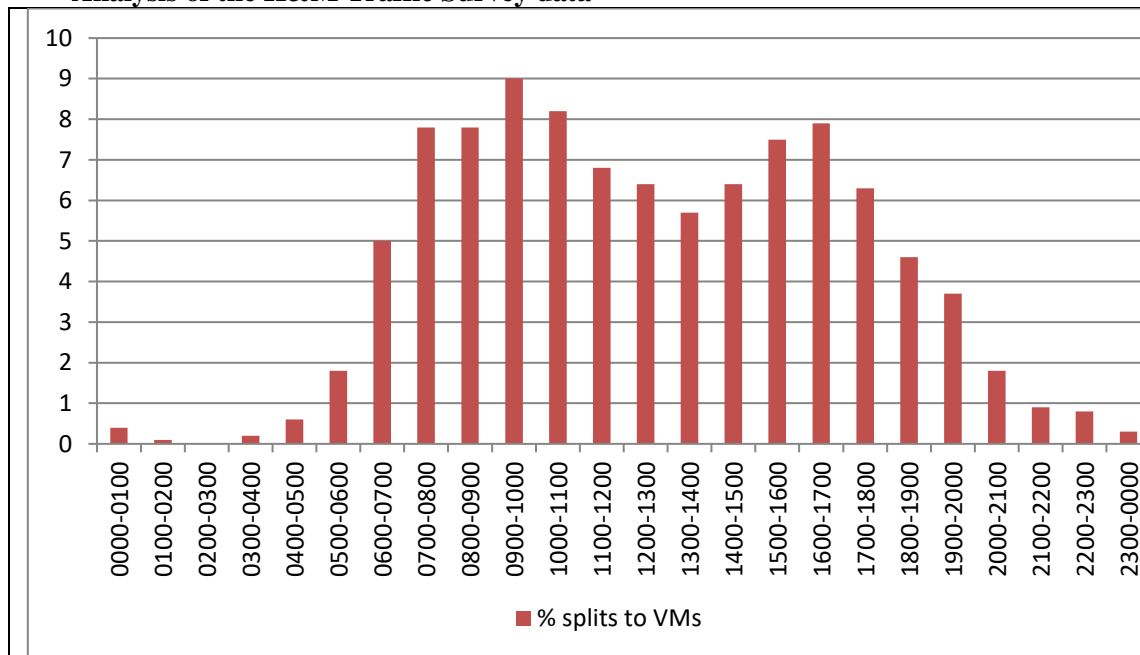
⁸⁹ See page 14 of the December 2022 Transport Statement

⁹⁰ 7am for the London Stock Exchange in terms of company announcement and 8am for trading of shares. Anyone working as an equity research analyst, as I did for c. 40 years, must have contributed to the morning note by a cut-off time of 7.30am

return from assorted work destinations at varied times, retirees arrive back from social engagements, golf course etc.

- To prove the point as regards BRD's data base, let us consider Bury St Edmunds in Suffolk, where Vale Lane with 18 detached houses has been included in the data set. Within easy walking distance of this, and offering possible employment, we find the following: a Dobbies Garden Centre; a home improvement shop; and an electric bike specialist shop. The Hospital and Greene King Brewery are also both close, again offering walking-based employment, with the centre itself within relatively easy walking distance. Vale Lane is also a cul-de-sac, with a major A road at the end (the A134) so that buses will hardly be infrequent along this.
- On the matter above of Elmdon having less concentrated peaks, the data subset within K&M Traffic Surveys included in the Transport Statement appendices proves this very point. Aggregating both the westbound and the eastbound traffic levels on Ickleton Road recorded at hourly intervals (as shown for Monday 8th July 2022 to Friday 14th July 2022 inclusive) and calculating % splits gives the following chart. It can be seen that in the morning there is a 4 hours period when 32.8% - or close to a third - of VMs arise. For the afternoon/evening, there is a 3 hours period when 21.7% of the VMs are logged.

Analysis of the K&M Traffic Survey data



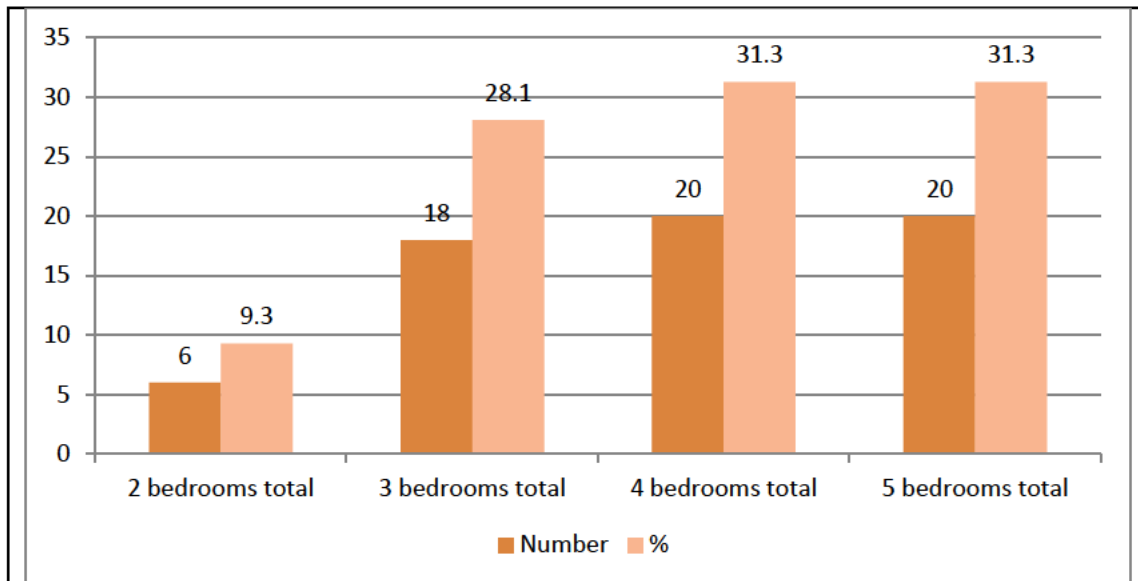
Can one derive a sensible model for Elmdon overall, rather than focusing on less truncated hourly peaks? I am of the view that this is possible and that it is the aggregate VMs over the course of the day that really counts. Lest GIGO accusations are levied, the assumptions used are clearly set out thus:

1. Note has been taken of how within the VDS it was noted⁹¹ that 29% of parish residents as per the 2011 Census were retired or looking after family. It has been assumed that only circa 10% of the resident population at Grange Paddock would be retirees as the vast majority of the dwellings are large family houses with 3-5 bedrooms that will appeal most to families. 90.7% of the bedrooms tally of 64 relates to these, as are demonstrated in the next chart and these larger properties would be most costly in terms of prices.⁹²

⁹¹ See page 6

⁹² There may be talk of a willingness to have 7 houses that are Affordable but the applications form showed emphatically that all 18 as of now are for market housing

Bedroom tallies for the proposed Grange Paddock



- It has been assumed that retirees venture forth a little less frequently compared to non-retirees, who would in the majority of instances be compelled to exit Grange Paddock in weekdays to work.⁹³
- Account has been taken of the number of 37 resident cars arrived at earlier based on VDS pointers for car ownership locally as per the 2011 Census data. It has been assumed that retirees occupy all of the 3 houses that comprise 2 bedrooms units.
- It has been assumed that retirees own an average of 1.5 cars per household, hence 4.5 which has been rounded up to 5. This leaves the remaining estimated 32 resident cars to be allocated to the non-retirees, hence 2.1 cars on average for these households.
- Common sense has been used to estimate three potential scenarios as per the next table. As can be seen, possible visitor vehicles have also been factored in:

Common sense appraisals

Scenarios	Visitors	Non-retirees	Retirees	Total
Scenario A:				
Daily vehicle car journeys	6	32	5	43
Daily VMs	12	64	10	86
Scenario B:				
Daily vehicle car journeys	8	38	7	53
Daily VMs	16	76	14	106
Scenario C:				
Daily vehicle car journeys	8	43	8	59
Daily VMs	16	86	16	118

- Scenario A assumes that one third of the 18 households have a visitor of some sort such as children, tradespersons, delivery vehicles from the likes of Amazon etc. For non-retirees, it has been assumed that all 32 resident cars of these make one journey out of Grange Paddock and for retirees the same has been presumed.
- Scenario B assumes that approaching 45% of the 18 households have a visitor of some sort. For non-retirees, it has been assumed that an average circa 1.2 outbound car journeys are made per household, with some persons for instance working part-time and

⁹³ The 'working from home' movement has not only peaked but has started to reverse considerably with a host of well known names in the private sector seeking a return to the office for all or most of the working week

returning for lunch and then going out shopping etc whilst some non-retirees will go out again in the evening to visit friends, go to the cinema, head to a pub/restaurant etc. Because Elmdon has such limited facilities – not even a pub even though the applicants seem to think there is one - and as everyone is reliant on a car for journeys of much over 2 miles, this is a reasonable assumption. For retirees with ample leisure time it has been assumed that multiple journeys are probable so that the ratio is 1.4 outbound car journeys per household per day.

8. Scenario C assumes that the visitor ratio is high enough. For non-retirees one has the equivalent of circa 1.3 outbound car journeys per household per day. Whilst for retirees it has been assumed an average of 1.6 outbound car journeys per household per day applies.
9. None of scenarios A-C above assume residents at Grange Paddock stay away overnight (VMs are 2x journeys in all cases) but it would equally be the case that at some of the 18 households some of the visitors (friends, grown-up children etc) would themselves arrive and stay overnight and could themselves then make multiple journeys whilst in temporary residence.
10. Nothing has been factored into the visitors tally for postmen and dustcarts as these visit the village anyway during the week.

In my view, it does not tax the imagination to imagine circa 112 incremental VMs per day – the average of Scenarios B & C (Scenario A is highly prudent). So would this amount of VMs be noticeable, or do we fall into line with the applicants claim that there would be “*an imperceptible impact on the local road network*”.⁹⁴ Ickleton West below is traffic K&M recorded heading west into the village and Quickset East is that heading east along Quickset Road out towards Ickleton etc:

Analysis of the K&M Traffic Survey data

Traffic	8/7/22	9/7/22	10/7/22	11/7/22	12/7/22	13/7/22	14/7/22	Total	Average/day
Ickleton West	322	238	239	303	279	314	303	1,998	285.4
Quickset East	271	258	229	267	263	270	300	1,858	265.4
Total	593	496	468⁹⁵	570	542	584	603	3,856	550.8

Is a possible uplift in the daily average VMs (from circa 551 to 663) of 20.3% significant? In my view it most certainly is and the effect on the local road network would not be “*imperceptible*”. The Chambers Dictionary definition of significant is thus: “*having a meaning: full of meaning: important, worthy of consideration*”. Even under the low Scenario A above, the increase is 15.6% - still significant as far as most people are concerned. The Chambers Dictionary incidentally refers to imperceptible as meaning: “*not discernible by the senses: very small, slight or gradual*”. In hard numbers terms, I would personally consider ‘imperceptible’ as denoting some 0.5-2%. Even taking the highest ratio here, the likely boost to daily average VMs calculated through some simple common-sense modelling is a magnitude 10x greater than the top end of ‘imperceptible’.

Some further points on this issue of the effect of additional traffic from Grange Paddock:

- There is an accepted graduation process to rising numbers. Hence ‘imperceptible’ is followed by ‘modest’ and then ‘significant’. I consider ‘modest’ in numbers terms is at least 10%. For the assessed VMs change of 112 noted, this is still 5x the magnitude of what I would consider applies to the word ‘imperceptible’.
- The K&M traffic data provided as part of this application suggests that on average over the 7 day period assessed VMs averaged circa 23 per hour along Ickleton Road.⁹⁶

⁹⁴ Page 14 of the Transport Statement

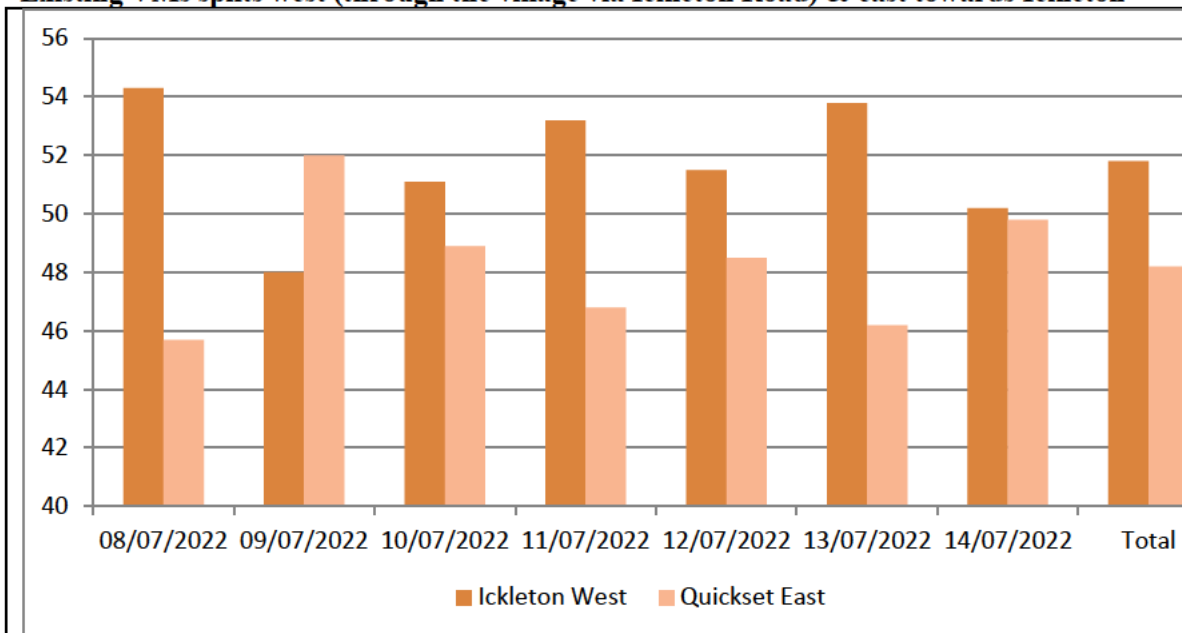
⁹⁵ This was a Sunday, hence the lower result

⁹⁶ 551 VMs divided by 24 hours

However, the data shows the limited VMs before 6am and after 7pm. If one reworks the data for 6am to 7pm alone then VMs total 3,451 (89.5% of the 24 hours totals), giving an average of 493/day⁹⁷ or circa 38 per hour. Hence additional VMs for most of the day would be on top of a far from small existing starting base. Bear this in mind when the Transport Statement alludes to a relatively “*low volume of traffic*” at present “*along Ickleton Road*”.⁹⁸ An existing 38 VMs per hour for this 13 hours slot may indeed be relatively low in the context of a town but in a quiet rural village the sound effects from passing traffic spread very wide, especially if there is braking, or if larger vehicles than cars are involved and are dodging the ‘pinch points’ from parked cars.

- The data for existing VMs as per K&M above splits thus (next chart). This strongly indicates that most of the extra VMs emerging from the site onto Ickleton Road would head west into the village, i.e. along a road characterised by numerous parked cars. Why the westbound bias? It is likely that the western ‘pull’ factors such as Audley End station skew the data somewhat against the eastern ones such as Saffron Walden.⁹⁹

Existing VMs splits west (through the village via Ickleton Road) & east towards Ickleton



Overall, it is abundantly clear that from a traffic perspective Elmdon is anything but a sustainable location. It offers essentially no village services, so residents are necessarily highly dependent on their cars. Hence the argument this would represent “*sustainable development...in a location which has good access to local services and in particular many of which would be accessible on foot*” is both wrong and misleading.¹⁰⁰ Few proposed sites in Essex could be less sustainable. Foot access to local services does not extend beyond a once-a-month Church service, an occasional event at the Village Hall and access to a high quality recreational ground.

Sustainability issues also enter the frame as regards utilities. For instance, the Affinity Water Annual Report & Financial Statement for 2021/22 cited¹⁰¹ how “*our region has the highest per capita consumption for the country and the most limited natural sources of water...*” and¹⁰² “*each person in the supply areas uses about 12 litres above the national average*” plus our area is

⁹⁷ 493 VMs divided by 13

⁹⁸ See page 12

⁹⁹ Western ‘pull’ effects will include the nearest pub (the Red Cow at Chrishall); Audley End station; the quicker route to the A505; onwards travel to Royston or Bishop’s Stortford etc. Eastern pull’ effects will include Saffron Walden; the Stumps Cross roundabout onto the M11 southbound; the War Museum roundabout onto the M11 northbound etc.

¹⁰⁰ Section 5.1 of the conclusion of the Design & Access, Heritage, Landscape and Planning Statement

¹⁰¹ See page 10

¹⁰² See page 14

“considered water stressed”. The chalk areas of Uttlesford typified by Elmdon are particularly water-stressed owing to their height and chalk’s inherent permeability. As regards the sewerage system managed by Anglian Water, there have to be major doubts if the existing system (located off Quickset Road just outside Elmdon) could cope. An extra 18 households would be a circa 12% uplift in the total number for the village. Probably more in % terms for the population: additional residents for Elmdon could number as many as 70+.¹⁰³

Sustainability issues also loom large for school places. At the primary school level, Chrishall School is nearby (with a school bus in term times from Elmdon) but places are now extremely limited. The same applies for the principal schools at Newport and Saffron Walden. The parents of a family of Ukrainians that we provided shelter for last year were able to secure schooling for all of their 3 daughters but there was a highly sympathetic ear extended that helped considerably and even then the middle daughter could not, as she wished, go to the same school as her elder sister. The NPPF stated that: *“It is important that a sufficient choice of school places is available to meet the needs of existing and new communities”*.¹⁰⁴ This is highly questionable here and no infrastructure funding offer has been made by the applicants.

Overall, one notes how the NPPF¹⁰⁵ specified that: *“Planning policies should identify opportunities for villages to grow and thrive, especially where this would support local services”*. There is no evidence in the case of Elmdon that adding 18 extra households would alter the current position of near non-existent local services within the village one iota. It would simply be a case of an unsustainable village being enlarged thereby boosting VMs as it became even more unsustainable.

Prior to proceeding, the sustainability issue is covered one more time (apologies but this is a key point and Elmdon fails this tag so severely). A local paper indicates that there are two new house estates presently being marketed in the vicinity. Both of these are at sites that could be considered highly sustainable given the train stations within close walking distance and the far superior bus options (plus a cycle route for the Chesterford Meadows one). The two are summarised next and contrasted with the distinctly weak showing for Grange Paddock:

¹⁰³ 64 bedrooms but there could be some sharing by younger children, especially for the six three bedroom units

¹⁰⁴ Page 27 of the updated 2021 version

¹⁰⁵ Page 22 of the 2021 updated version

2 actual sites with good sustainability criteria versus one with next to none

Site	Characteristics	Units & sale prices	Facilities nearby
<i>Grange Paddock</i>	<i>Prominent location in open countryside outside the village development limits wasting Grade 2 agricultural land.</i>	<i>18 houses, largely 4 or 5 bedroom properties likely to appeal to affluent London commuters or bioscience executives based in/close to Cambridge.</i>	<i>Acutely limited. The population of Elmdon was perhaps 340 at the time of the 2011 Census.¹⁰⁶</i>
Bricketts, Newport ¹⁰⁷	Sited within the existing village around a cul-de-sac just off the London Road. Gas central heating.	11 houses: semi-detached and barn-style detached. Details for Plots 1 & 2 are lacking but Plots 3-11 comprise two 3 bedroom houses plus seven 4 bedroom houses. Selling prices for three 4 bedroom units are shown as £799,995-£880,000. Being developed by Enterprise Property Group Ltd.	Sub 0.5 miles from the railway station to Cambridge or London. Extensive facilities include: abundant local buses; 2 pubs; a Church; a tennis club; a social club; youth organisations; and a Village Hall. 2011 Census population was 2,352. Close proximity to Saffron Walden.
Chesterton Meadows ¹⁰⁸	Sited within central Great Chesterford and including 1.5 acres of woodland that is being planted (for public access). There will be a management company for the external communal areas. A largely rectangular site adjoining and parallel to London Road.	46 houses: two 2 bedroom bungalows; three 2 bedroom houses; thirteen 3 bedroom houses; twenty-one 4 bedroom houses; and seven 5 bedroom properties. 5 properties are for sale currently – three 4 bedroom houses priced at £649,950-799,950 and two 5 bedroom properties at £919,950-929,950. ¹⁰⁹ Being built by Hill Group.	Shown as being: 0.2 miles from the railway station; 0.3 miles from School Street Surgery; 0.4 miles from a Deli; 3.4 miles from Whittlesford Parkway station; and 3.6 miles from a Tesco supermarket. Great Chesterford with a 2011 Census population of 1,494 has a wide range of local facilities beyond those already noted, including a primary school, 2 pubs, a hotel and bus services. It is also only circa 1 mile from J9a of the M11.

Traffic & Safety Concerns

Points of note:

- Increased VMs will inevitably lead to increased pollution and diminished air quality, especially along Ickleton Road. The latter is likely to be subject to greater ‘vehicle dodging’ and/or queues due to the existing parked vehicles. [Yes, the Ickleton Road is c. 6m wide for most of its length, as stated, but at the ‘pinch points’ from the numerous parked cars only c. 4 metres applies]. UDC ‘Air Quality Technical Planning Guidance’, issued in June 2018, identified¹¹⁰ how: “*Development of greenfield sites on the outskirts of towns or villages are likely to have the greatest potential for generation of additional traffic and impact on air quality*”. It later,¹¹¹ cautioned how schemes for 10+ dwellings

¹⁰⁶ The population then was 610 as per page 6 of the VDS with 269 households but these numbers included Duddenhoe End and the surrounding hamlets. Elmdon alone comprised c. 150 of the households. The Jean Robin book had – post a survey by Cambridge University students – a much firmer estimate for 1964 of 321

¹⁰⁷ Based on the sale brochure

¹⁰⁸ Based on [REDACTED] plus the website of the Hill Group, a London & South-East focused house building concern which claims to be the UK’s second largest private house builder

¹⁰⁹ An overall price range of £399,950-929,950 is cited as per [REDACTED]

¹¹⁰ Cited on page 6

¹¹¹ Cited on page 14

will require an Air Quality Assessment (AQA), with¹¹² mitigation measures “*required to ensure all developments are ‘air quality neutral’ as far as reasonably practicable*”. Defra’s ‘Clean Air Strategy’ published in 2019 stated¹¹³ that: “*Air quality is the largest environmental health risk in the UK. It shortens lives and contributes to chronic illness*”. Later sections¹¹⁴ indicated road transport accounts for 12.5% of Primary Particulate Matter (PM_{2.5}), 34% of Nitrogen oxides (NO_x), and 5% of Non-methane volatile organic compounds. Even if (most improbably given the cost) all cars stationed at the proposed development were electric, particulate pollution has been shown to be far worse from the tyres of vehicles than from their exhausts.¹¹⁵ No such AQA has been provided.

- Car sizes have increased considerably in recent years and the trend is ongoing. The increased size factor including width. Europe’s top-selling VW Golf car has increased from 1630mm wide at the time of the original mid-1970s version to 1,789mm now for the 8th generation model. The Porsche at launch in 1964 had a width of 1,700mm that is now 1,852mm, whilst the latest Range Rover has swollen to 2,209mm from the 1,778mm applying at its 1970 launch.¹¹⁶
- Many of the extra VMs assessed would boost traffic levels along some nearby roads. As identified, Heydon Lane has a carriageway of only 4.5 metres.¹¹⁷
- The new access road for the proposed site would be a massive safety risk given the scale of the increased VMs noted. The NPPF stated that applications for development must ensure “*safe and suitable access to the site can be achieved for all users*”.¹¹⁸ This does not look likely here, whilst the access location near the bend coming into Elmdon from Ickleton presents evident concerns. There would also be a potential conflict between Grange Paddock entering/exiting vehicles and those entering/exiting Alfred Shott. I understand that the owners of the latter were so concerned about safety issues on purchasing the property in 2009 that they altered the original exit from much closer to Quickset Road.
- Where is the council budget to improve the roads around Elmdon?
- Traffic speeding issues along Ickleton Road near the proposed access road entrance are identified.¹¹⁹ However, it is highly debatable if the proposed mitigation measures would be a sufficient deterrent and also if traffic entering the village via Quickset Lane would have slowed sufficiently prior to passing the new access road near Hollow Road. Speeding has been an issue within the village for years, with policing of infringements non-existent – the Police have higher priorities. The increased VMs observed will materially boost the chance of accidents and it will be observed that even the Alfred Shott applicant has admitted to “*multiple occasions where close calls took place on the junctions with their drive and with Hollow Road*”.¹²⁰
- The 18 additional houses proposed would be likely to have oil-fired central heating.¹²¹ A gas connection does not exist in Elmdon (which was only mains drainage connected in 1975)¹²² and heat pumps remain prohibitively expensive, even with a £5,000 grant with low take-up as a result.¹²³ No house-building concern taking on Grange Paddock is likely to wish to take the margin hit from adding heat pumps where running costs have also

¹¹² Cited on page 21

¹¹³ Cited on page 7

¹¹⁴ See pp16-20

¹¹⁵ Emissions Analytics, as quoted in *The Guardian* on 3/06/22

¹¹⁶ All dimensions cited in the 18th February *Saturday Telegraph* motoring section titled *Size matters why our cars are getting bigger and heavier*

¹¹⁷ Page 9 of the Transport Statement

¹¹⁸ Cited on page 32

¹¹⁹ Pages 11 & 12 of the Transport Statement

¹²⁰ Page 11 of the above again

¹²¹ The Planning Statement concedes in Section 4.83 that this would be an electric only site

¹²² See the Jean Robin study, page xxii of the foreword by Audrey Richards who lived in the village and lectured at the Department of Anthropology at the University of Cambridge at one stage

¹²³ On 22nd February the *Daily Telegraph*’s Business section included a feature titled *Why Britain gave heat pumps a cool reception*. Its appraisal included note of how official figures show only 7,600 of the first 30,000 heat pump vouchers (for the grant of £5,000) had been redeemed by end January 2023, using up just £38.4m of the first year’s £150m budget. The Energy Saving Trust was cited as to how even after the grant the cost for a typical household was £2,000-£7,000. The Government is not due to ban gas boiler installations until 2035

surged as electricity prices rocket. Even with large (1,500-2,000 litres) tanks it does not strain the imagination to envisage at least 36 oil tanker visits to the site per annum, adding to congestion at the ‘pinch points’ along Ickleton Road. Oil tanker traffic that would not feature at a sustainable site with a mains gas connection. The ‘all-electric’ comment for this site is not a ‘given’: little is ever firm for outline planning permission.

- The Transport Statement cited¹²⁴ how a review of the CrashMap website “for the latest five-year period ending in 2021...highlighted that there have been no incidents within a close proximity to the proposed site”. However, in the real world cars from a new rural development certainly do not travel purely within ‘close proximity’ of the site. It is commonplace for 2-wheel drive vehicles to be unable to surmount the Ickleton Hill to gain access to Elmdon in snowy and icy conditions. This applied in 2022 after the 12th December snowfall of circa 4 inches. Crashes from slips into hedgerows on poorly gritted local roads are alas a not infrequent feature. If one extends the CrashMap scene to moderately beyond Elmdon’s boundaries, the following picture arises (the next Table). Observe here too that the crossroads at the end of Quickset Lane has gained a degree of notoriety locally. On 12th November (hence not captured in the map that only extends in its statistics to 2021) we returned to Elmdon from Granchester at around 12.30pm and were obliged to stop as there had been a crash at this crossroads with the Police and an Ambulance present. Faced with a potentially long wait, we turned around and took an alternative (considerably longer) route home. Then in mid-December 2022, an Elmdon resident was involved in an accident at the very same cross-roads. Sources indicate his car was shunted off the road into a ditch and rendered a write-off – but whilst badly shaken he was fortunately unhurt. Because Elmdon is such an unsustainable village with such limited services, there is a remorseless logic to sanctioning Grange Paddock: the 20%+ rise in VMs calculated leads to more outwards/inwards travel to places offering services, employment etc, leading to more crashes on rural roads which are often narrow and feature sharp bends. In winter these unclassified roads are rarely gritted; in summer verge cutting has been reduced on economy grounds.

The 10 crash results in the locality of Elmdon to end 2021 (now at least 12 such crashes) ¹²⁵

Nature of injury	Where it occurred
Slight:	Near Heydon.
	Near Pond Street.
	Near Catmere End.
	At Catmere End.
	Near Littlebury Green.
	Near Lees Farm (not far from Littlebury Green).
Serious:	At the cross-roads at the end of Quickset Lane.
	On Royston Lane near the cross-roads at the end of Quickset Lane.
	At the cross-roads of Royston Lane, Strethall Road, the back road to Duxford and the road to Catmere End.

Concerns At This Proposed Site’s Prominent Landscape Setting

A list of public rights of way appears within Appendix D of the Transport Statement but neither this document nor the Planning Statement makes any attempt to convey the full importance of these. Numerous villagers walk these routes daily,¹²⁶ whilst it is commonplace for people to travel to the village specifically for the purpose of walking/dog walking or

¹²⁴ Paragraph 6.3 on page 15

¹²⁵ 1999-2021 data map

¹²⁶ The Freewood Farm circuit (being from Elmdon, up the High Street, along to Freewood Farm, across to Hollow Road and thence back to Elmdon – or done in reverse) is perfect for all ages. A varied walk that locals and visitors alike never tire of doing and one feasible in all weathers owing to the hard surfaces. It is also only a circa 45-55 minutes circuit, depending on age and fitness

cycling. Nordic Walking groups have even been seen in Elmdon in recent years.¹²⁷ In my view, the reason why the documentation is comparatively silent on these public rights of way is probably to avoid admitting to just how prominent in the landscape this housing would be and to downplay its intrusive urbanisation of the countryside (and the associated destruction of good quality Grade 2 agricultural land). We consider these matters below:

- Whilst it is true that there are no existing public rights of way crossing the site or near its immediate boundaries, this could change. The previous owner of the Elmdonbury Estate placed barbed wire across the entrance way to the chalk pit.¹²⁸ Possibly an illegal action and many villagers (me included) can recall regularly walking up the track from the chalk pit and around the surrounding higher areas prior to this move. Historically, farmhands in the village walked from Elmdon via this track to work e.g. at Rectory Farm.¹²⁹ It would be possible for this historic usage to be reflected in an addition to the definitive map. The Highways Act of 1980 states that if a route is enjoyed by the public for 20 or more years as of right and without interruption, the path is “*to be deemed to have been dedicated as a highway*”. Village newcomers often find it puzzling why this part of the village is ‘out of bounds’.
- The Elmdon 5 and the Elmdon 42 public rights of way shown as per Appendix D of the Transport Statement are of far higher status. Specifically they form part of the famous Icknield Way which, via a narrow, often muddy, track from the centre of Chrishall, enters the village along Heydon Lane near the Church. It then proceeds up the village High Street and travels to and through Freewood Farm before making a sharp right at the top of Hollow Road and progressing onwards to Strethall. Considered the oldest road in Britain¹³⁰ and with a name purportedly derived from the Iceni tribe, this circa 110 mile track travels from Wiltshire to Norfolk.¹³¹ Importantly, some suitable parts of it are deemed a multi-user route open not only for walkers, but also horse riders and off-road cyclists. It also provides links to other Ways/Trails with the Harcamlow Way one such nearby link option.¹³²
- From the junction of the Elmdon 7 public right of way (as per the Transport Statement’s Appendix D) with the Icknield Way (Elmdon 5) along to the historic Mill Mound, there are some significant and panoramic views of the vast majority of this proposed site. Similar views are afforded along the Icknield Way for some distance beyond the Mill Mound. The northernmost hedge along this stretch contains gaps, with that near the Mill Mound circa 10 metres in length and with only a couple of shrubs that barely impede the fine views that include the Grade II Church and other listed buildings within the Conservation Area as well as the proposed Grange Paddock. It is therefore the case that the visual intrusion of the proposed Grange Paddock would be viewed by many from a high overlooking ridge and a track of historic importance. Moreover, since the Icknield Way is open to horse riders with their additional height, the development would be even more visible for a significant distance by them when heading along this track towards Freewood Farm. There also glimpses of the site from parts of what Appendix D shows as

¹²⁷ The Saffron Walden based firm doing this can be seen at [redacted] and the website shows one of its meeting locations to be St Nicholas Church, Elmdon

¹²⁸ I believe this occurred when Mr Pearson acquired the farm and Elmdonbury from Major Rippinghall who was the nephew of Mrs Wilkes (see pages 93 & p7 of the previously cited Jean Robin study)

¹²⁹ True for the grandfather of one longstanding Elmdon resident he notes that his grandfather could not afford a bicycle

¹³⁰ Anglo Saxon charters mention it from 903 onwards as per Wikipedia

¹³¹ Around noon on the 4th of March I chatted to 3 men with large rucksacks near Freewood Farm who were walking the entire Icknield Way in stages spread over a series of week-ends. Impressive

¹³² This way runs in a figure of eight loop from Harlow to Cambridge and back again, travelling 141 miles through 3 counties. It passes through Chrishall, the nearest village to Elmdon

Elmdon 42: still part of the Icknield Way.¹³³ None of the land nearby is owned by the applicants so mitigation measures – which would require extra hedging plus allowance for hedge growth to sufficient height to impede the view of a horse rider at all times is not an option.

- Within my Appendix D, I provide a number of photographs, including some taken from the Bridleway (Elmdon 7 as per the Transport Statement) 40-60 paces from where it intersects with Icknield Way. Once again, there are widespread panoramic views that would be marred by the proposed prominent development in the countryside, beyond the village development boundaries.
- Near the top and down towards the middle section of Hollow Road, it is also possible to see part of the proposed site and at one point the vista sweep again includes the Grade II listed Church. The views of the site would be increased in the event of a successful planning application owing to the widespread tree destruction indicated for the new access road.
- There is also another – if briefer - view of the site (in conjunction with the Church and some of Elmdon’s historic listed buildings) from the middle section of another public right of way: the footpath that travels from near Pump Cottage up past the alpaca farm to emerge on Essex Hill near the entrance to the cricket and football field. This is designated ‘Elmdon 10’ as per Appendix D of the Transport Statement. We would concede that this footpath is used less frequently than the public rights of way noted above but it is used consistently all the same.
- As regards the height differences involved from these viewing points of Grange Paddock, note that there is a Trig Point of 127 metres shown on the OS map¹³⁴ near Freewood Farm. I am of the view – given the very flat terrain when walking along the Icknield Way from the Mill Mound to Freewood Farm – that it is at a similar height. This is reinforced by the 125m contour running slightly to both the north and south and parallel to the Icknield Way at the Mill Mound. With the lowest point for Grange Paddock shown on the Topographical Survey as being c. 102m and the highest point circa 111m, there is therefore a height differential of 16-25m (circa 53-83 feet); hence the fine views mentioned. A near similar height differential will appertain as regards the viewing point from near the top of Hollow Road as the 125m contour passes across this road not far from the turn-off onto the Icknield Way leading to Strethall. A likely height differential therefore of 14-23m (circa 47-77 feet). These latter numbers will also apply when viewing the proposed Grange Paddock from the bridleway (Elmdon 7 as per the Transport Statement) 40-60 paces from where it intersects with the Icknield Way.
- Elmdon enjoys dark skies. This benefit will be impacted if – as I understand would be legally ‘necessary’ - street lighting accompanied this development.¹³⁵ ‘National Planning Practice Guidance: Healthy & Safe Communities’ issued in 2019 asked: *“Is the development in or near a protected area of dark sky or an intrinsically dark landscape where new lighting would be conspicuously out of keeping with local nocturnal light levels..”* Policy GEN 5 of the 2005 Local Plan indicated¹³⁶ that development should only be allowed if *“Glare and light spillage from the site is minimised”*. Very difficult with an elevated site such as this. The 2021 NPPF confirmed¹³⁷ that planning policies should

¹³³ As one approaches the junction with Hollow Road where the Icknield Way diverts to Strethall, there are some notable viewing gaps

¹³⁴ The Pathfinder 1050 series (TL 43/53) for Saffron Walden has been used

¹³⁵ Currently, only Horseshoe Close has street lighting, reflecting its relatively recent development

¹³⁶ Cited on page 15

¹³⁷ Cited on page 53

“limit the impact of light pollution from artificial light on...intrinsically dark landscapes”.

Biodiversity Concerns

A nationwide planning feature currently is a raft of solar farms. These are supposed to be decommissioned at the end of their designated lives (typically 40 years) but loss of BMV quality land in significant acreages is often a feature.¹³⁸ However, one part redeeming virtue the solar farms can claim is a biodiversity increase due to mitigation measures such as the planting of edge-of-farm tree belts to shield nearby residents/road users from ‘glint and glare’ concerns, and the withdrawal of arable land from intensive cultivation. Hence current Section 62A applications include one for a circa 189 acres solar farm at Maggot’s End near Manuden, which it is considered *“would provide a positive permanent contribution to biodiversity within the site”*.¹³⁹ So what of Grange Paddock? Observations here:

- The documentation from the ecological experts makes no claim for biodiversity enhancement. A biodiversity loss appears inevitable given: the greenfield loss to accommodate the access road, houses, garages and visitor parking; the removal of some hedging; the felling of numerous trees; and the disruption from the construction process. The pond added as part of the design would have only a small-scale mitigation effect, especially as it is not spring-fed and will rapidly dry out in the low precipitation summers so typical of East Anglia.
- The effects of installing a few bat boxes and low street lights to allow for this species are questionable, given the habitat destruction. Not least as bats almost certainly forage here at present, as is conceded.¹⁴⁰
- As the Arboricultural Impact Assessment (AIA) concedes, there would be a *“high impact from the loss of trees to the front of the site”*.¹⁴¹ The extent of the tree removal is not formally quantified but appears on a plan,¹⁴² whilst the detail provided in the AIA suggests the butcher’s bill to be 29 dead (with 3 wounded.) It is also possible from the above mentioned report to summarise tree loss thus:

¹³⁸ *Incompetent energy security management for the UK over many decades has left the government making a play of the MW’s to be gained from solar farms. Even though the loss of farmland only adds to the UK’s poor food supply security. However, this is another issue...*

¹³⁹ *Page 4 of the Ecological Impact Assessment Report*

¹⁴⁰ *Cited within the ‘Preliminary Ecological Appraisal’ of December 2022*

¹⁴¹ *Cited on page 37*

¹⁴² *OS 2369-22 1-3 etc as per the Application Plans & Documents*

Chainsaw Alley – a summarised version

Reference designation	Variety	Height (metres)	Stem diameter (mm)	Maturity designation
T1	Ash.	9.5	330	Mature.
T2	Hawthorn.	5.5	600	Over-mature.
T3	Ash.	15.0	520	Mature.
G1	Blackthorn.	3.0	125	Mature.
G2	Blackthorn x 2.	3.5-4.0	175 average	Mature.
G5	Horse chestnut x 2.	7.0-9.0	270 max	Semi-mature.
G6	Sycamore x 2.	12.0	360 max	Mature.
T6	Hawthorn.	2.0	100	Young.
T7	Sycamore.	12.0	240	Semi-mature.
T8	Ash.	20.0	590	Mature.
T9	Ash.	17.0	570	Mature.
T10	Ash.	22.0	430	Mature.
T11	Ash.	20.0	400	Mature.
T12	Ash.	22.0	430	Mature.
T13	Ash.	12.0	460	Mature.
T14	Ash.	22.0	550	Mature.
G11 (partial)	Sycamore, hawthorn, ash belt.	10.0—13.0	350 max	Mature.
T19	Sycamore.	11.0	220-430	Mature.
T34	Ash.	19.0	570	Mature.
G22	Mountain ash, field maple, horse chestnut, Norway maple, hornbeam, birch, hawthorn, cherry.	3.0-7.0	125 average	Young/semi-mature.

- In ‘old money’ terms, mature trees of up to 73+ feet in height will be felled. This will have a profound effect on the landscape scene from both that end of Ickleton Road and as viewed from the surrounding countryside. The tree loss will be most noticeable from parts of the Icknield Way, bridle path Elmdon 7 (as per the Transport Statement designation), and on descending into the village from the top of Hollow Road. The unlimited tree height for Ash species is given in the documentation¹⁴³ as 23.0 metres so T10, T12 and T14 are approaching their full glory (although the Woodland Trust website ascribes possible maximum heights for Ash trees of 35 metres and potential ages of 400 years¹⁴⁴). Ash trees are of course currently vanishing at speed already in the UK as a result of the ash-dieback disease, although seemingly none of the 10 specimens above have this – all receive a ‘normal’ physical condition tag within the AIA report (the only 3 that do not being T29, T31 and T33 that are ironically not set to be removed).
- Although not a protected species (as yet), the brown hare has been in decline, with this not helped by illegal hare coursing gangs, which have been known to operate locally. This development would remove acreage known to be frequented by hares.
- There is an absence of a record on the biodiversity check list for badgers. However, these have been seen by villagers in the vicinity of the chalk pit at Alfreds Shott. There are signs of badger activity present on the track that heads uphill towards the chalk pit. One possible sett on [REDACTED] when viewed from [REDACTED] looks to have not been used for some time but the other [REDACTED] is larger and appears to have seen more recent activity.

¹⁴³ Cited in the *Arboricultural Impact Assessment* on page 33

¹⁴⁴ Longer still if coppiced as per the Woodland Trust

- [REDACTED]
[REDACTED]
[REDACTED]
[REDACTED]
[REDACTED] Territories with ranges of 20-50 hectares (49-124 acres) covering areas as large as 150 hectares (370 acres, or half a square mile) are common for badgers in rich habitat areas. The figure rises for territories that have poorer habitats and hence require more distant foraging.¹⁴⁵ It has passed into village legend (to his annoyance) that one village resident was hospitalised after hitting a badger when cycling out of the village in another direction: illustrative of how badgers are common around Elmdon.

Overall, the biodiversity issue in relation to the proposed site is a highly concerning one.

Concerns That Are (Largely) Specific To This Proposed Site Layout

Please note the following for general concerns:

- The attenuation basin (pond) created on the site to deal with flood risks would be a major safety risk to young children. Its inclusion looks absurd given the frequency of deaths from drowning. On the 18th of February it was reported how a 10 months old girl in Leicester drowned in just 5 inches of water after her mother left the room temporarily with the bath's plug hole uncovered and returned to find it blocked by a plastic toy.¹⁴⁶ The dimensions of the pond as per the SUDS Report¹⁴⁷ are thus: a base areas of 58 square metres; a top-of-the bank area of 210 square metres; and a depth of 1.15 metres. The latter is 3.83 feet – more than enough for an easy drowning - so how would this pond be barred off to avoid this risk? And if it is, in effect 'wired in', how can maintenance around it easily arise?
- With no natural spring feed, the drainage pond would only contain water for some of the time, so it would be an eyesore the rest of the time when its only biodiversity benefit would – for a short period - be wet mud for house martins to build nests with. It could also be an unpleasant source of mosquitoes for nearby residents.
- If one could ignore the pond, the SuDS (sustainable drainage systems) report might appear to offer an elegant solution to flood/surface water risks given its provision for a once in a 100 years extremity incident. [Although those living nearby along Ickleton Road who have suffered from known flooding incidents in recent years are likely to be annoyed at the comment that "*there have been no recorded flood incidents at the site or within the vicinity of the site*".¹⁴⁸ The system features permeable paving for access road area, rainwater collection into the pond from properties 9-18 and rear garden soakaways for properties 1-8. However, the SuDS report makes it apparent that appreciable maintenance will be a prerequisite for system efficacy in later years. This rigorous maintenance schedule, if followed, will avoid site run-off but will help to boost annual service charges. Whilst if it is not followed the above comment that it merits a qualified 'elegant' tag would be destroyed. The major maintenance elements are summarised next.

¹⁴⁵ Cited in the mammals section of [REDACTED]

¹⁴⁶ Reported in the Daily Telegraph then amongst other media

¹⁴⁷ See Paragraph 5.10 on page 12 of the Flood Risk Assessment & SuDS Report' of December 2022

¹⁴⁸ This is based on a 2016 map from Uttlesford Strategic Flood Risk Assessment and it is curious that past flooding complaints – which even led to the use of sandbanks at the entrance to one Manor Row property – were not reflected here

There is a risk element if some/all were not adhered to, especially if a lax management company were to be appointed:

Management for the infiltration basin (pond) & soakaways

Maintenance needed	Actions involved	Frequency per year
Regular	Inspect for sediment & debris.	1x
“ “	Clean gutters & filters on downpipes.	1x
Occasional	Rebuild soakaways if fail.	As needed.
Ongoing monitoring	Check silt traps, pipework & soakaways.	1x but monthly in Year 1.

- How much might the proposed annual maintenance fee for the playground, open ground offered as site/village facilities and the SuDS be? There appears to be no offer of establishing a sinking fund at the outset to purchase/hire mowing, strimming equipment etc¹⁴⁹ and to generate the future investment returns to cover such costs. In addition, the pattern with such service charges emulates council tax, i.e. it never declines and escalates ever higher. How is this reconcilable with the pointer that the applicants might – if push comes to shove – be prepared to consider allocating 7 of the 18 houses as Affordable (although the application form actually designates all 18 as market housing)? A hefty annual service charge would severely diminish the capabilities of affordable housing-allocated householders to pay even a sub-market rental, or meet general living costs if it were a shared equity scenario. ¹⁵⁰Annual service costs for a ride-on mower are currently at least circa £350-400¹⁵¹ so after factoring in petrol costs plus strimming plus labour plus the management of the pond, soakaways, playground etc,¹⁵² it is very easy to see the yearly service charge per house running considerably into 3 figures. There would too be the need for costly public liability insurance cover (say £5m worth of cover) for the playground itself. Interestingly, the Savills sale particulars for the Bricketts development at Newport noted earlier cited an estimated ‘estate charge’ of £452+ per property per annum.
- Why would any other residents of Elmdon wish to use the (sloping) open spaces indicated when they have a fine and far larger existing (level) recreational field?
- What precisely are the playground facilities? The plan¹⁵³ suggests “*swings, slide, climbing frame etc*” but this is all rather vague as to their quality/full extent. It is also noteworthy that to access the playground facility – that is sited in just about the most inconvenient position possible for them – residents at Grange Paddock would need to exit along the access road, walk along the pavement of Ickleton Road, cross this road and then follow an L-shaped path. There is no means of access for residents directly via the site. The suspicion is that the playground facilities – whatever they might comprise – were part of a box-ticking move to be seen to offer something for the village community.
- The Proposed Site Plan and much of the other documentation include an unmade path which does not exist (and possibly never did). This, confusingly, appears to suggest site entry would be possible for walkers using this. In reality, all Grange Paddock residents proceeding on foot or using cycles would need to use the same access road as vehicles. Although this is 6m wide, the expanding girth of cars has already been noted above. With

¹⁴⁹ The storage of which is an issue the documentation is silent on

¹⁵⁰ Especially following 10 successive base rate rises to 4% and at a time of marked cost of living rises

¹⁵¹ My 12 year old Countax has just cost £356 for its annual service (which would have been more had it not merely required nothing that was not routine such as an oil change, blades sharpening etc). 40 lots of annual mowing at Grange Paddock per annum @ £15 per hour for 2 hours per time would cost another £1,200 ex petrol

¹⁵² Where call-out charges for costly specialists would be necessary too, along with the inevitable VAT on top

¹⁵³ Proposed Site Plan

no pavements or alternative path provided, resident would need to swim against potential vehicle traffic. A coinciding incoming and outgoing VW Golf would leave circa 2.4 metres for a pedestrian –adequate but less in practice (at perhaps 2.3 metres) since the 2 cars would need to avoid access roadside kerbs. With the latest Range Rover model, the space left for a pedestrian in the above circumstances would fall to circa 1.6 metres or perhaps 1.5 metres after again allowing for avoidance of access roadside kerbs. Were a lorry or oil delivery tanker to meet with a car whilst pedestrians were present, matters could be tighter. According to the Crown Oil Fuels & Lubricants website, an oil tanker has a width of 2.59 metres so that if one coincided with a Range Rover it would leave the pedestrian a maximum circa 1.2 metres or more like 1.1 metres allowing again for some kerbside clearance. Far from ideal, especially if a pushchair were involved: it would have to be lifted off the access road ASAP.

- There is an allusion in the Transport Statement to how development is “*made sustainable in the longer term...by encouraging walking, cycling and public transport use*”.¹⁵⁴ There is nothing to be read across from the proposed site layout to state that this would be relevant for Grange Paddock. No cycle rack/parking provision, no separated pedestrian access route for inhabitants to Ickleton Road and no funding assigned for the establishment of a regular bus service link for Elmdon. As was conceded in the Transport Statement, space for 36 cycles ought to be provided as per Essex design stipulations.¹⁵⁵ Instead, house garages will have to suffice.
- It is claimed in the Statement of Community Engagement¹⁵⁶ that: “*The proposed layout has a distinct character to reflect the general layout of existing dwellings in the village*”. The Planning Statement makes the claim of comparability of Grange Paddock to Elm Court and Horseshoe Close.¹⁵⁷ This is nonsense. Elm Court was developed by John Brown of Saffron Walden from a former butchers’ yard with 5 large 4 bedroom detached houses in the cul-de-sac section and 6 smaller houses to the front along Ickleton Road (in part where the former butchers shop existed).¹⁵⁸ So this site had a brownfield pedigree. The 5 larger houses are serviced by a narrow access road, with no pond or open space. There is no loop road. Horseshoe Close was developed by UDC to the rear of council houses built in 1948,¹⁵⁹ in part on former allotments for these.¹⁶⁰ Some houses were built too fronting Hollow Road but these are not part of Horseshoe Close where naive comparisons are again being attempted. I believe the build was around 1990/91 and within Horseshoe Close there are 5 semi-detached bungalows and 5 semi-detached houses. Most of the houses within this close comprise semi-detached bungalows. Again, there is no loop road or central pond set within a green, whilst this housing is 100% council as against market housing. In numbers terms, 18 for the proposed Grange Paddock plays 11 for Elm Court and 8 for Horseshoe Close. Significantly too, neither of the latter two locations is on high ground with resultant landscape prominence.
- For the village writ large, there is nothing remotely similar to the design of Grange Paddock. The former clearly developed on paper by an architect, whereas Elmdon has largely developed on a small-scale and piecemeal basis over centuries as the Jean Robin study clarifies. Yet again, an absence of due diligence work to substantiate the claims

¹⁵⁴ Paragraph 2.1 on page 2

¹⁵⁵ Paragraph 4.11 on page 13

¹⁵⁶ Paragraph 1.10

¹⁵⁷ Paragraph 4.25

¹⁵⁸ 4 to one side of the entrance (1-4) and 2 on the other side closest to the Church

¹⁵⁹ Jean Robin xxii foreword section

¹⁶⁰ A small field sold by James Cross was, we believe, also used. He could not access this with tractors according to a former farmhand

made? Most certainly a case of the applicants not respecting the historic village pattern, including this being a generally linear one along the Ickleton Road.

- It is asserted that the 18 dwellings “*would not intrude into the street scene or into the outlook of those buildings on the south side of the main road*”.¹⁶¹ This defies belief: a double-ranked arrangement of houses and one bungalow set in parallel to Ickleton Road on rising ground. Although legally no one has a right to a view, those using the bedrooms of buildings on the south side looking out over Grange Paddock cannot but notice this development. Their upstairs privacy has to be impaired and the amenity value of their properties impacted given too influences such as increased noise, the expanded VMs assessed above etc. However, the applicants merely double down on their claims later on: “*it is considered that the proposed dwellings would not cause direct overlooking or any loss of light or outlook*”.¹⁶² Perhaps they genuinely believe this, or perhaps it is felt that if it is said enough times others may. Interestingly, the recent Tate Modern legal case involved flats suffering a loss of privacy at a distance of 34m (circa 113 feet) although matters here were admittedly extreme.¹⁶³
- Developments are supposed to take note of “*the need to ensure an adequate provision of spaces for charging plug-in and other ultra-low emission vehicles*”.¹⁶⁴
- The design of developments is also supposed to be “*sympathetic to local character and history*”.¹⁶⁵ This is not the case here, albeit that it is only outline planning permission being sought. Who knows who could end up building at the site if permission were granted – it could be a major house builder such as a Persimmon or Taylor Wimpey, who tend to use bog standard designs.
- ‘The Clean Growth Strategy’ issued by HMG in October 2017¹⁶⁶ cited how 13% of UK emissions are from homes, whilst ‘A Green Future: Our 25 Year Plan To Improve The Future’, issued by HMG in 2018, stressed¹⁶⁷ how “*new development should result in net environmental gain*”. There is little evidence of virtuous green credentials for the design submitted for Elmdon.
- Why has the single bungalow (on Plot 18) not been assigned to where the houses are on Plots 11-17 given that the latter are on the highest part of the site and will lead to the most overlooking? It might also be questioned why – given the amenity spaces indicated – more bungalows have not been included.

Turning to the matter of Affordable Housing, a few remarks are warranted:

- There is vagueness here. On the one hand all 18 houses for which outline permission is sought are ‘market’ based in the application form but then a rabbit is seemingly pulled belatedly from the hat. “*...the applicant is willing to provide seven dwellings as affordable properties to be managed by one of the Council’s preferred Registered Providers....This could be secured by way of a Section 106 agreement*”.¹⁶⁸ A notable U-turn compared to the pre-application pointers last June but one that has simply taken note of how the UDC ‘Housing Strategy 2021-2026’ document issued in October 2021

¹⁶¹ Paragraph 4.26 of the Planning Statement

¹⁶² Paragraph 4.96 of the Planning Statement

¹⁶³ The Supreme Court ruled in favour of the flat owners (see its website for case ID 2020/0056) on 1st February 2023. The issue was that Tate Modern built an extension in 2016 called the Blavatnik Building that was 10 stories high and included a top floor viewing gallery that had a ‘goldfish bowl’ effect for nearby flat residents on 4 floors. 0.5-0.6m persons per annum were estimated to use this viewing platform. The case is extreme but it shows that privacy is a right

¹⁶⁴ Page 31 of the NPPF

¹⁶⁵ Page 38 of the NPPF

¹⁶⁶ Page 13

¹⁶⁷ Page 7

¹⁶⁸ Paragraph 4.99 of the Planning Statement

mentioned¹⁶⁹ that Uttlesford will “*continue to require 40% affordable housing provision upon market-led sites*”. Particularly so given high house prices and affordability ratios for this part of Essex. The NPPF¹⁷⁰ in fact indicated that the 40% ratio could be ‘skipped’ in rural areas but only with a trigger threshold of “*5 units or fewer*”. There are 18 units here so that 7 was always the figure that needed to be offered.

- The UDC 2005 Local Plan defined affordable housing as having weekly outgoings for housing costs that 20% of Uttlesford householders in need can afford, exclusive of housing benefits. Whereas for the applicants, affordability would be met “*either by way of rent or reduced sale price*”.¹⁷¹ Hence a third party aids the rental payment process, or via a shared equity scheme indirectly enables a lower entry price to be paid.
- The 7 units designated affordable would very likely comprise the one 2 bedroom bungalow + the two 2 bedroom semi-detached houses + four (of the six) 3 bedroom semi-detached houses. Overall, 28.1% of the aggregate 64 bedrooms involved. It should be noted however, that as there are no terraced houses to be created, then even with Housing Association assistances it might not be the case that would-be interested parties would be able to afford any of the 7 units. One observes that a brand new 2 bedroom bungalow is currently being marketed by Cheffins in Saffron Walden for £475,000.¹⁷² In the event of ‘no takers’ (or no takers at what would be acceptable margins for the developer) then Grange Paddock might after discussions with the planners revert to becoming 18 market housing units as per the application form.
- On the general issue of affordability, the most recent Uttlesford housing market report¹⁷³ observes the boosting effect of the proximity of Cambridge and London. Hence average new build house prices are £565,000 versus £393,610 for the Eastern Region overall. Average prices for all housing stock for Uttlesford have risen from £521,904 as of February 2021 to £591,444 as of November 2022. To access the cheapest ward’s 2 bedroom house (in the Flich Green and Little Dunmow ward) using a 15% deposit needed a joint income of £54,650. Whilst shared ownership schemes of UDC need only a 5% deposit, it again looks difficult to assume there would necessarily be 7 affordable properties to be carved out from Grange Paddock. In the case of the First Homes scheme (for first time buyers who can gain a discount of 30-50%), the price cap of £250,000 post discount that applies outside London implies the same problem as the starting price pre discount would need to be sub £357,143-500,000.

The Precedent Factor/Opening Of The Floodgates Concerns

One of the promoters of this scheme owns large acreages of land along the Ickleton Road out to the Royston crossroads plus further land within the village. Granted every planning case always requires a separate application but in my opinion if Grange Paddock is approved – despite being 100% outside the development limits, on prominent Grade 2 land and in a clearly unsustainable location – other developments will prove inevitable. It will not so much be a case of the dam being breached but of the dam wall being blown up. So what else could follow within a decade or so? The following appears feasible:

¹⁶⁹ Page 24

¹⁷⁰ Page 17 of the 2021 publication

¹⁷¹ Paragraph 4.109 of the Planning Statement

¹⁷² This was advertised in the Saffron Walden Reporter on 23rd February 2023

¹⁷³ That for November 2022

‘What if’ scenarios –my personal view only

Possible name	Comments
Grange Close.	New residents at Grange Paddock and existing residents of Elmdon make little or no use of the kids playground and the nearby open space. Noting this, an application could follow for further houses with the kids’ playground removed.
Alfreds Field.	The access road for Grange Paddock is looped around the boundaries of Alfreds Shott to develop land alongside Quickset Road. Eventually, a new access road is added onto Royston Lane, allowing development right up to this on further good quality agricultural land.
School Pasture.	The gap between The Old School and Parkgate House (both on Ickleton Road) is used to develop further grazing land to the rear of Ickleton Road. Grange Paddock has, by then, already established a precedent of estate development within the village’s open countryside.

Ultimately, an extremely elongated linear village could result - a mini-Newport. Expansion of the village towards Chrishall could also ensue, further boosting vehicle traffic, pollution and the loss of high quality agricultural land badly needed for food production. One point is for sure: the character of the existing village would not be respected by any of the above, just as it would not be by Grange Paddock itself.

Planning Contraventions With The Proposed Grange Paddock

As a mere lay-person with only DIY planning knowledge, it nevertheless appears that this planning application contravenes all/most of the following when one looks back to the last LP:

Apparent planning breaches with the proposed Grange Paddock as per the last LP

Policy	Comments	Does Grange Paddocks satisfy this?
S7	As per the 2005 LP: “... <i>planning permission will only be given for development that needs to take place there or is appropriate to a rural area</i> ”. ¹⁷⁴	NO: it is not appropriate for a rural area, destroying Grade 2 land and urbanising the countryside.
GEN1	Development must encourage “ <i>movement by means other than driving a car</i> ”. ¹⁷⁵ It should also ensure incremental traffic could be accommodated on local roads and not compromise road safety and should take account of the needs of cyclists, pedestrians and horse riders. ¹⁷⁶	NO: it would be a huge failure on these counts given the lack of alternative transport facilities already described. This has been implicitly recognised by the applicants by the over-provision of car parking spaces for residents.
GEN2	Should not affect the enjoyment of existing residential properties via “ <i>loss of privacy, loss of daylight, overbearing impact or overshadowing</i> ”.	NO: there would, inevitably be some adverse impact, including on the fine and well-maintained Grade II listed ‘The Hoops’.
GEN 6	Development must not be allowed “ <i>unless it makes provision at the appropriate time for community facilities, school capacity, public services, transport provision, drainage and other infrastructure that are made necessary by the proposed development</i> ”. ¹⁷⁷	Only in terms of providing a kids playground and open spaces. Elmdon residents were never asked if they wanted the former ‘facility’ (which looks a cheap box-ticking move), whilst abundant open space already exists within the village given the recreational field and numerous walking routes. SuDS may ensure compliance for site drainage but it is a resounding NO for transport provision, school capacity and other infrastructure.
ENV5	As regards the protection of agricultural land: “ <i>Where development of agricultural land is required, developers should seek to use areas of poorer quality except where other sustainability considerations suggest otherwise</i> ”. ¹⁷⁸	NO: there is no evidence that other site options involving poorer quality land have been explored, so vital Grade 2 land would be lost forever. ¹⁷⁹ Other sustainability considerations cannot enter the frame as Elmdon is such a

¹⁷⁴ Cited on page 7

¹⁷⁵ Cited on page 12 of the 2005 LP

¹⁷⁶ The unnamed Hutchinsons partner (planning expert) cited in Appendix C regarding the Henham appeal dated August 2021

¹⁷⁷ Cited on page 15 of the 2005 LP

¹⁷⁸ Page 28 of the 2005 LP

		demonstrably unsustainable village.
ENV8	Development affecting hedgerows, tree belts, woodland etc. To be allowed only if <i>“The need for the development outweighs the need to retain the elements for their importance to wild fauna and flora”</i> and <i>“mitigation measures are provided that would compensate for the harm...”</i> ¹⁸⁰	DOUBTFUL: whilst the hedges to be partially removed are young, the extent of the tree destruction for the new access road is such that there would be considerable biodiversity loss. Mitigation, if fully possible which is highly dubious, would take decades to apply as a counter-measure.
H1	This <i>“concentrates housing development in the main urban areas and other locations well related to employment and facilities”</i> . ¹⁸¹	NO: Elmdon is demonstrably an unsustainable location with extremely limited employment and facilities.
H3	Relates to infilling within development limits. This <i>“will only be permitted if...compatible with the character of the settlement and ...its countryside location”</i> . Elmdon was one of the village settlements where this applied. Additionally, development would only be permitted if all of 6 criteria were met, including that the site comprised brownfield land and offered <i>“reasonable access to jobs, shops and services by modes other than the car”</i> . ¹⁸²	NO: This scheme is incompatible with the character of Elmdon and fails to respect the countryside location. It is any event not infilling but the imposition of a large urban estate upon a prominent rural setting that is highly visible from surrounding public rights of way, including the famous Icknield Way. The site is not brownfield and the only realistic means of accessing jobs, shops etc is by car.

Of course the 2005 LP is now dated, but one would expect major elements of it to be picked up anew as and when the revised LP finally emerges. The \$64m issue then becomes the degree to which the above longstanding planning policies can or should be overridden by the more recent NPPF, with its intrinsic presumption (in England) in favour of sustainable development. 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”*.¹⁸³ This is Paragraph 11’s so-called ‘tilted balance’ stance.

The presumption in favour of sustainable development being based on three interdependent economic, social and environmental metrics:¹⁸⁴

The 3 aims of the NPPF¹⁸⁵

Economic	Social	Environmental
Aiding a strong economy via ensuring <i>“sufficient land of the right types is available in the right places and at the right time....and identifying and coordinating the provision of infrastructure”</i> .	Supporting <i>“strong, vibrant and healthy communities by ensuring that a sufficient number and range of homes can be provided....and by fostering well-designed, beautiful and safe places, with accessible services and open spaces....”</i>	Via aiming <i>“to protect and enhance our natural, built and historic environment; including making effective use of land, improving biodiversity....and mitigating and adapting to climate change, including moving to a low carbon economy”</i> .

Hence there is a different and broader definition of sustainable development to that which the person in the street would perhaps contemplate. Even so, and even after bearing the above in mind, in my view Grange Paddock ought not to be allowed to proceed. This stance being on the following suggested assessed scorecard:

¹⁷⁹ The fact that this land has been used for grazing in recent years is academic the grading of the land still applies and it could easily be brought back into cultivation. As Mark Twain famously stated *‘Buy land they’re not making it any more’*

¹⁸⁰ Page 28 of the LP once again

¹⁸¹ Page 34 of the LP

¹⁸² Page 35 of the LP

¹⁸³ Paragraph 11 page 6 of the 2021 NPPF

¹⁸⁴ Cited on page 5 of the 2021 NPPF (that superseded the 2012, 2018 & 2019 versions)

¹⁸⁵ Page 5 of the 2021 NPPF throughout

A suggested scorecard for Grange Paddock

Factor	Comments
<i>Economic negatives:</i>	
This site	Does not represent land of the right type in the right place at the right time as it contravenes S7, GEN1, ENV 5, H1, H3 and most of GEN6. Destroys further good quality farmland, exacerbating the county's need to import ever rising quantities of food (where supply security is becoming a growing issue).
Infrastructure	Does nothing to boost local infrastructure and is likely to strain it as per GEN 1 and GEN 6.
<i>Economic pluses:</i>	
Locally	Minor: possibly some boost temporarily to local trades people during the construction phase and perhaps a slight boost thereafter from maintenance work undertaken by the management company. No guarantees.
Nationally	Minor: A minute fillip to the building materials industry and hence major concerns such as CRH Plc or Istock Johnson Plc. 18 housing units added towards the Government's targeted 300,000 per annum but this amounts to just 0.00006%. Some boost to purchases of luxury consumer products from 2 Elmdon households but this would be statistically imperceptible noise in the overall GDP of the UK. Possibly too fractionally higher CGT receipts for the Treasury.
<i>Social negatives:</i>	
Locally	Contravenes S7, GEN1, GEN2, ENV 5, H1, H3 and most of GEN 6. Adds nothing to local services and local facilities: likely to strain them given an influx of some newcomers from London/outside East Anglia. Diminishes the quality of life and the amenity value of their properties for existing villagers along Ickleton Road and for all villagers by virtue of the c 20% rise in VMs identified. As this is outline planning being sought, good design is not assured – Rocol might flip this site on ASAP to what could be a very bog standard builder. Open spaces are already a merit enjoyed by all Elmdoners. Potentially destroys the character and setting of a unique village that has evolved gradually over time. Important and panoramic views from the ancient and extensively used Icknield Way are diminished.
Nationally	Irrelevant.
<i>Social pluses:</i>	
Locally	A plus for the pub, if it ever reopens, and perhaps the cricket team if incomers mix. An additional 18 properties including potentially 7 that could be designated affordable (though they may not be in practice). The addition for the village of a kids playground (although it may not even be used that much).
Nationally	Irrelevant, other than the most imperceptible and marginal of relief for a Government that has signally failed to control immigration, leading to a housing shortage.
<i>Environmental negatives:</i>	
Locally	Contravenes S7 (protecting the countryside) and ditto GEN1, ENV5, ENV8, H1 and H3. Also contravenes GEN6 if the kids playground and SuDS are excluded. Removes 29 trees linked to the access road insertion, a factor in biodiversity loss. Boosts VMs and arguably does nothing to further the move to a low carbon economy. Impacts on heritage assets, notably 'The Hoops'.
Nationally	Irrelevant, other than setting a bad example and minutely setting back the Government's net zero by 2050 legal commitment.
<i>Environmental pluses:</i>	
Locally	None that can be identified.
Nationally	None.

To approve this site simply for its 18 houses requires a 'tilted balance' aspect to any interpretation of the NPPF that looks hard to endorse in my view. The trail of harmful effects is, after all, a long one.

Now is a convenient point to touch upon the revisions to the NPPF underway as the consultation here ended on 2nd March and the pointer was that (subject to the consultation not indicating grounds to the contrary) these changes would be effected in Spring 2023.¹⁸⁶ This updating of the NPPF (for England) covers a wide canvas but whilst the commitment to the 300,000 per annum new homes by the mid 2020s remains, changes include:

- Making clear “*how housing figures should be derived and applied so that communities can respond to local circumstances*”;
- Making sure that food security considerations are factored into planning decisions affecting farm land;¹⁸⁷
- And promoting more beautiful homes.

It was suggested that the Bill “*will strengthen opportunities for people to influence planning decisions that affect their immediate area*”....with “*increased weight to neighbourhood plans...*”.¹⁸⁸ Whilst ...”*planning is not just about number; it is about getting the types and quality of homes that communities need in the right places and supported by the right infrastructure – and supporting our wider economic objectives like delivering levelling up, fuelling urban regeneration and redeveloping brownfield land*”.¹⁸⁹ The Bill also detailed the intention “*to remove the requirement for LAs with an up-to-date plan..... to demonstrate continually a deliverable 5-year housing land supply*”.¹⁹⁰

Whilst I accept that UDC is currently in special measures owing in large part to its lack of an updated LP and its inability to meet the 5 years land supply threshold, at some stage it will emerge from this debacle. In my view, the Planning Inspectorate needs to look ahead to this position and to how there will be less of a Soviet-style ‘tractor statistics’ rigidity as regards the 5 years land supply issue. Moreover, whilst Elmton does not have a neighbourhood plan (due to gain “*additional protections....where a local planning authority’s policies for the area covered...are out-of-date*”),¹⁹¹ in my view there should be some recognition at least of the fine work and detailed local consultation implemented in the VDS that was approved by UDC in June 2019. Essentially, localism will count for more once the modified NPPF is ratified and the 37 page VDS produced for Elmton was a superb illustration of localism in action. This is the VDS ignored by the planning applicants who in proposing Grange Paddock are disregarding too its findings that were derived after extensive and bona fide consultation. As commented by MPs Bob Seely and Theresa Villiers, who built an alliance of 100+ like-minded Conservative colleagues to drive negotiations with Michael Gove for reforms to the NPPF: “*For years, we’ve needed a planning system that is community-led.....For years, we’ve had the opposite*”.¹⁹² They also indicated in the same media article that:

- “*Inspectors will be required to take a more ‘reasonable’ and ‘pragmatic’ approach*” to plans involving the local community.
- “*With the removal of the land supply obligation, the ‘tilted balance’, which is used so often by developers to bulldoze land – literally and metaphorically – into the planning process, will, for the most part, go as well. Its time is up*”.
- The Government would also review “*how to give a stronger priority to brownfield land*”. With councils to be given powers “*to impose higher levies on brownfield sites to help create more incentives to switch to brownfield*”.
- To attain levelling-up, “*more housing will be aimed at reviving communities in the urban areas of cities in the Midlands and North*”.

¹⁸⁶ *Levelling-up and Regeneration Bill reforms to national planning policy, published 22nd December 2022 with a 22/12/22 to 2/3/23 consultation period*

¹⁸⁷ *All from Chapter 1, Paragraph 4*

¹⁸⁸ *Chapter 2, Paragraph 6*

¹⁸⁹ *Chapter 2, Paragraph 7*

¹⁹⁰ *Chapter 3, Paragraph 4*

¹⁹¹ *Chapter 3, Paragraph 11*

¹⁹² *Quote from an article jointly written by these 2 MPs that appeared in the Daily Telegraph on 5th December 2022*

- There is a need to “*gently densify our regional cities to take pressure off suburbs and rural areas*”.

With these ‘winds of change’ imminent to the NPPF,¹⁹³ it is requested that the Planning Inspectorate takes note of them in the decision regarding Grange Paddock at Elmdon. Theresa Villiers was, after all, a former Environment Secretary. Chapter 7 of the proposed NPPF reforms incidentally also stressed the need for biodiversity net gains (the reverse would be true for Grange Paddock),¹⁹⁴ whilst recognising the food production value of farmland (which would be lost forever here).¹⁹⁵

Criticisms Of The Design & Access, Heritage, Landscape and Planning Statement

A line-by-line stance has been followed here.

- Paragraph 1.5: The access road it is stated would give “*vehicular and pedestrian access direct to each property*”. This is misleadingly worded. Pedestrians are not provided with a pavement and would be obliged to use the access road which could result in conflicting situations with vehicle traffic. The wider theme to cars has already been commented on, and ditto the number of possible oil tanker movements. Paragraph 1.8 is misleading for the same reason.
- The inclusion of a non-existent unmade path as per the site map below Paragraph 2.1 confuses.
- Paragraph 2.4 notes an “*informal footpath...passing through the site*” and that this is “*not a statutory right of way*”. Correct, but I suspect the blocking off of this path may by a former owner of Elmdonbury Estate may have been illegal. It was a path long frequented by villagers and farm workers and could perhaps become a future right of way.
- Paragraph 2.7: “*the site is remote from its setting*” (meaning the village Conservation Area). This is nonsense – the site is anything but remote - and is in fact highly visible from the ancient Icknield Way and from several nearby bridleways/footpaths/public roads. In many instances, it is possible to see the site in conjunction with both the Church and some of the other listed buildings within the village Conservation Area. Including the listed buildings surrounding Elmdonbury itself.
- Paragraph 4.1: “*it is the applicant’s case that this proposal would represent sustainable development that would enhance the viability of existing communal facilities and services....*” It is hard to ascertain how this development could be deemed ‘sustainable’ given the necessarily high car reliance of existing villagers. Existing communal facilities and services are virtually nil, especially after noting the closed pub and no longer functioning childminder service already commented on.
- Paragraph 4.2: “*..in this case the limited adverse impacts are not such as to outweigh the balance of this proposal*”. The ‘limited adverse impact’ is not something many villagers would agree with, whilst the suggested scorecard constructed above indicates there is far more to matters. In my view, the changes likely to the NPPF and its ‘tilted balance’ stance also deserve to enter the frame.
- Paragraph 4.15: following a reference to the widely-acknowledged characteristics of the Elmdon Chalk Uplands Landscape it is commented that “*very few of these characteristics are displayed by the application site*”. This is for a site that was until relatively recent part of a large scale rectilinear field and can be readily viewed from the

¹⁹³ They could even have been fully enacted by the time of the 16th May 2023 target date for a decision on Grange Paddock

¹⁹⁴ See Paragraphs 6 and 7

¹⁹⁵ See Paragraphs 10 and 11 of Chapter 7

broad ridge across the valley (including from the Icknield Way) with panoramic vistas from near the Mill Mound, another bridleway (as described earlier) and the top of Hollow Road all very much a feature. Accordingly, this assertion of the applicant is wrong.

- Paragraph 4.17: *“The application site does not protrude into the panoramic vistas of this locality”*. As just observed, this is utter nonsense – it does. It is also commented that *“The village is not tree enclosed”* but there has been something called Dutch elm disease which has wreaked havoc since Elmdon was so named for its elms. Regrettably, we had to have a large number of extremely large elm trees felled only a few years ago (I believe it was in 2014) on the route up from Ickleton Road to Great Harvesters. Those felled were in a bad state and contained large white grubs. Just one large specimen remains, which was pollarded by the tree surgeon to seek to save it. Generally, however, there are lots of trees round the village.
- Paragraph 4.18: *“...whilst there would be some short-term impact by way of relatively prominent built form, in the longer-term new landscaping could mature to provide a substantial degree of relief”*. ‘Substantial’ here would be a subjective matter, whilst the scale of the tree-felling near the access road would require decades to negate. Given the natural rise to the site and the stacking of two-storey houses along the upper echelons of the loop road (on some of the highest ground of the site), this claimed mitigation is highly debatable. Whilst the longer term is not clarified and as the famous economist Keynes noted, ‘in the long run we are all dead’.
- Paragraph 4.19: *“In terms of enjoyment of the countryside, it is noted that there are no public footpaths within the vicinity..”*. True for the **very** immediate vicinity, but as already mentioned there are ample points from which a wide panoramic sweep that includes this site exists. Again, suggestive of absent due diligence work.
- Paragraph 4.20: *“...whilst the wider countryside beyond the application site and the village is relatively attractive countryside, there isn’t a degree of unusual special attributes that would give it a more elevated landscape value”*. Few would agree with this statement for a village that attracts numerous ramblers, dog walkers and cyclists, including those traversing sections of the famous Icknield Way. Audrey Richard, then a mere member of the Department of Social Anthropology at the University of Cambridge, commented thus in the foreword to the Jean Robin study published in 1980: *“Elmdon is generally described as a pretty village. Indeed, I do not remember ever hearing a visitor using another adjective for it”*.¹⁹⁶ She then remarked how *“Medieval English villages tend to have been built on the slopes of fortified hills where these existed and this gives them their variety and charm. Elmdon between two such hills is a fine example”*.¹⁹⁷ The estate agent particulars¹⁹⁸ from my first property purchase here in 1986 (at Elm Court) highlighted how it was *“situated in the delightful Essex village of Elmdon”* and extolled how *“Elmdon is a village for discerning country lovers”*. Nothing has changed.
- Again in Paragraph 4.20: *“...there are no major visual effects expected from the development”*. So one is led to believe that development on an elevated, prominent and wholly greenfield site (with 94% of the dwellings 2-storey properties) will have little visual impact! Moreover, the site for those traversing the bridleways, footpaths, Icknield Way etc would be highly visible unless they shut their eyes when at certain locations.
- Paragraph 4.24: There would be no direct *“footpath connections”* as far as the 18 houses are concerned. The only footpath connection is to the kids playground.
- Paragraph 4.26: It is claimed the new dwellings would not *“intrude into the outlook of those dwellings on the south side of the main road”*. This would be unlikely for 1-4 and 10-11 of Elm Court as the hawthorn hedge here is thinner and lower and is semi-transparent in winter. It would also require the residents of these properties not to use their north-facing bedrooms throughout the year.
- Paragraph 4.32: *“...public spaces within the site would feel safe”*. There is silence on how drowning by young children in the pond could be avoided.

¹⁹⁶ Described thus in xvii of the Foreword

¹⁹⁷ Described thus in xxiii of the Foreword

¹⁹⁸ Robert Comins of Saffron Walden

- Paragraph 4.38: *“The presence of local services would also negate the need for residents to travel by car for some day-to-day functions. This includes the church and village hall”*. Highly misleading wording given that in practice the Church and Village Hall would be the only local services that could be reached by means other than a car. Neither of these two buildings is characterised by high usage rates, with the former in existential decline nationally.
- Paragraph 4.39: *“The proposal can encourage future occupants of the dwelling to access services within the village by foot or bicycle”*. Farcical comments given the severely limited services within the village. Obfuscation for the fact that to reach the services/facilities that everyone now uses outside the village a car would have to be deployed.
- Paragraph 4.40: It is claimed that the example of Manuden with its *“good range of day to day services”* somehow supports the applicant’s case. However, Manuden has vastly superior services to Elmdon, is a much larger village in population and is also closer to other major centres of population beyond its boundaries. These points are summarised below:

Why a comparison of the 2 villages is invalid

Variables	Elmdon	Manuden
Distance to nearest major centres of population.	5.8 miles (Saffron Walden)	(3.9 miles) ¹⁹⁹ Bishops’ Stortford.
Population as per 2011 Census.	340 (estimated) ²⁰⁰	677
Services enjoyed.	A part-time Church, a small Village Hall and an excellent recreational field.	Primary school, a Church (with frequent services), a renowned Village Community Centre (offering a floodlit multi-use games area football pitches & cricket ground plus a main hall suitable for varied indoor activities), a Village Hall, golf and history societies and the Yew Tree pub.

- Paragraph 4.46: *“All new housing would be accessible via pavements....as shown in the proposed layout”*. No new pavements can be found on the proposed site plan.
- Paragraph 4.49: *“The submitted transportation statement identifies the availability of public bus services but also that the traffic generated by 18 residential units would have an imperceptible impact upon the local roads network”*. As noted, most of the bus services are only available from elsewhere (such as Ickleton), with the only bus service of note being one intended for school children in term times. The methodology used for the traffic assessment looks dubious and my common-sense analysis suggested a circa 20% rise in VMs from the site compared to those currently applying for Ickleton Road. An *“imperceptible impact”* claim is plain wrong.
- Paragraph 4.49: *“....there have been no accidents within close proximity to the site”*. Widening of the CrashMap parameters indicates 10 crashes to end 2021 within a few miles of Elmdon and it is a known fact that there have been 2 more in late 2022 alone. Boosting the population of an unsustainable village that is so reliant on car use is bound to lead to some rise in crashes given the often narrow rural roads.
- Paragraph 4.6: It is claimed that landscaping effects would ensure little/no impact on Grade II listed ‘The Hoops’. This is debatable, not least as ‘The Hoops’ would be highly visible from Plots 14-17 set on the highest part of the site, and vice-versa. Inhabitants of ‘The Hoops’ would also suffer more (localised) noise after the site was developed, plus the rise in VMs along the Ickleton Road noted. As there is quite a ‘pinch point’ aspect to

¹⁹⁹ As per AA mileage calculator

²⁰⁰ This has to be estimated as Elmdon, Duddenhoe End and surrounding hamlets are considered as one

²⁰⁰ Numerous cars parked at the adjoining 1-4 Manor Row cottages are a fact owing to their lack of off-street car parking

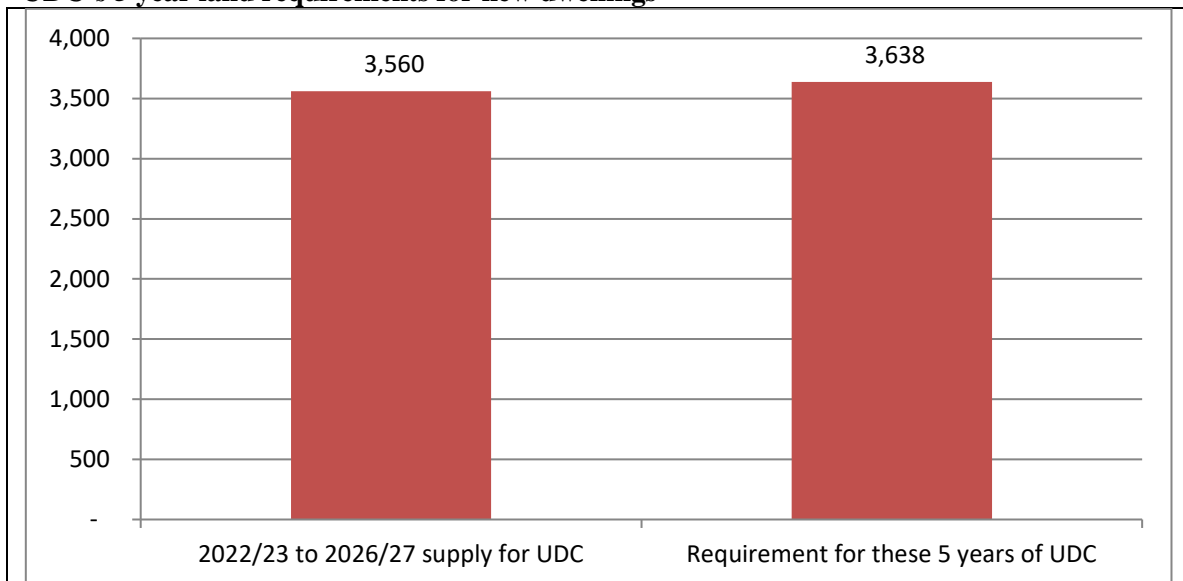
Ickleton Road here,²⁰¹ and since ‘The Hoops’ is not set well back from the road and is behind a small hedge, it would be at expanded risk of physical damage, especially from lorries/HGVs/oil tankers visiting Grange Paddock.

- Paragraph 4.79: The arboricultural impact assessment is said to identify “*the limited range of trees that would be removed to facilitate the access*”. This supposedly limited range runs to 29 trees (plus 3 that are partially removed), including 10 mature ash trees. Die-back is an issue nationally but all these 10 currently appear to be in good health as per the AIA report.
 - Paragraph 4.80: “*...there would be no harm to trees that could not be overcome by replacement planting*”. This overlooks a) the time needed for replacement trees to grow, and b) the fact that the access road that causes the destruction would require many replacement trees to be repositioned shuffled together elsewhere on the site. By no stretch of the imagination can this scheme be ENV3 compliant or have a neutral impact in this regard. Observe that as per the RHS website an ash tree takes 20-50 years to reach its ultimate height and a sycamore tree 50+ years.
 - Paragraph 4.84: Reference is made to Appendix E of the flood risk assessment and the “*Thames water sewer records*”. This is a longstanding Anglian Water area. The Appendix E cited includes on the map a ‘love every drop Anglian Water’ logo. Further evidence of singularly poor due diligence work in my view.
 - Paragraph 4.96: “*...it is considered that the proposed dwellings would not cause direct overlooking or any loss of light or outlook*”. This is erroneous – some adverse impact would be inevitable and hence GEN2 would be conflicted. How can 2-storey properties be built on rising ground and not lead to overlooking and affect the outlook of the residents, especially from upstairs windows facing the site?
 - Paragraph 4.104: “*...this is a relatively small parcel of land in the context of the overall countryside*” (implying its loss counts for nothing). This is an appalling attitude towards the loss of BMV land. 5 acres here, 10 acres there, 25 acres elsewhere all multiplied many times over nationally soon adds up, especially at a time when solar farms individually covering hundreds of acres (and not being confined to Grades 4-5 agricultural land) enter the frame. As someone who grew up on a predominantly arable (rented) 500 acres Rutland farm, I find this stance shocking. Good farm land should be retained for crops if at all possible.
 - Paragraph 4.104 again: “*...much of the district comprises high-quality agricultural land and therefore there is little flexibility in terms of the location of new development...*” As observed, the revisions to the NPPF indicate a greater onus on brownfield land and also on densification within urban sites to help preserve scarce agricultural land. The suggestion in Paragraph 4.105 that Grange Paddock could be ENV5 compliant is erroneous.
 - Paragraph 4.105: “*Therefore it is submitted that the proposal is not contrary to policy ENV5 or to the objectives of paragraph 174 of the NPPF...therefore the impact on agricultural land is of neutral weight in the planning balance*”. In my view, this comment is not a logical follow-on from Paragraph 4.104.5. As noted, the NPPF is undergoing reform that will be implemented imminently, with greater efforts implicit to protect BMV land. Rightly so too.
 - Paragraph 4.106. “*...it is proposed to include within the scheme an area of communal open space for use by all villagers*”. Were the villagers ever asked if they wished for this open space and if they would be likely to use it? NO and NO. It is highly improbable in my view if many existing villages would have any desire to use this space given the option of a) the private gardens that most possess, b) the many miles of countryside walks on their doorsteps, and c) the availability of a fine recreational field just off the High Street that is flat and far larger in extent. This provision should not therefore be “*a positive factor in terms of the planning balance*” (Paragraph 4.107). It is arguably an example of ‘cakeism’ in terms of the applicants trumpeting the low density and large
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private gardens for Grange Paddock and then seeking to make claims for an added side effect from these.

- Paragraph 4.109: *“The key benefit... is the delivery of 18 dwelling...”*. In my view it is the only benefit.
- Paragraph 4.109 again: *“The local planning authority was stating....in recent decisions that it had only a 3.11 years supply” (of housing land)*. This is very misleading given that in the next paragraph an appendix is alluded to in which - as of 1st April 2022 - UDC updated its ratio to 4.89 years, although the Planning Statement per se does not detail this precise figure. UDC was in fact a mere 78 houses shy of the 5 year threshold then, even after allowing for the required 5% buffer effect. This 5 years period being for 2022/23-2026/27. On a proforma basis, the 5 years threshold could have been surpassed in the second half of 2022 as further approvals granted trickled through. No mention of this in the Planning Statement.

UDC's 5 year land requirements for new dwellings



- Paragraph 4.114: *“The delivery of housing is a top priority for government both nationally and locally...”*. Correct, but the revisions to the NPPF cited make it plain that the winds of change are now blowing and are blowing away from crude numbers targets. The maintenance of the ultimate 300,000 per annum new housing additions is also now taking account of how more need to be from urban and brownfield sites with more too (owing to levelling-up considerations) to be in the North and Midlands.
- Paragraph 4.115: *“The only harm that cannot be mitigated would be the introduction of built form upon an otherwise open field....this would have only a minor impact upon landscape character, in the longer term”*. This is misleading and inaccurate. The ‘open field’ cited is also a prominent one and the built form added would have considerable harm. The landscape character would be permanently affected, not least in terms of the panoramic vistas from nearby footpaths, bridleways, the top of Hollow Road and parts of the ancient Icknield Way.
- Paragraph 4.116: *“...it is submitted that only limited weight should be given to the fact that this proposal is contrary to the letter of policy S7.....with regard to the protection of the visual character of the countryside”*. I disagree. Whilst the matter is subjective, and whilst it is accepted that Policy S7 is both supported and in conflict with the NPPF, a pretty high weighting looks readily warranted. To downplay Policy S7 so massively is contrary to the protective role of the countryside that it came into existence for. Assigning only ‘limited weight’ here would be a green light for every local land speculator seeking what the late Lord Hanson famously once dubbed *“tomorrow’s price today”*.

- Paragraphs 4.117-4.126: These seek to make comparisons of Elmdon with that of Henham, where approval was granted for 45 dwellings at Mill Road. In my view, the comparison has been stretched too far and there are also some notable differences as set out overleaf:

Difference between the Mill Road (Henham) site and Grange Paddock

Factor	Mill Road	Elmdon
Facilities	Primary & nursery schools, part-time shop/post office, Community Association Hall, Sports & Community Hall, Tennis Club, Church, Church Hall, pub and gym. Regular bus services to Elsenham, Stansted, B.Stortford and Stansted Airport (all with rail links). ²⁰² 441 bus for school pupils. A <i>“rich social infrastructure”</i> .	A part-time Church, a small Village Hall and an excellent recreational field. A bus for school pupils in term times but far greater car reliance versus Henham. A far more limited social infrastructure owing to the distinct lack of facilities.
Population	1,233 (including Little Henham and Plegdon Green) as per the 2011 Census. Now far larger due to the circa 20% increase in dwellings since then. ²⁰³	610 as of the 2011 Census but an estimated 340 then for Elmdon alone after excluding Duddenhoe End and surrounding hamlets.
Site area	Circa 12.8 acres of arable field.	Circa 5.6 acres formerly part of a large arable field but later sub-divided into pasture.
Access	From the existing Mill Road.	Would have to be ‘carved out’ via an old Chalk Pit close to an existing property entrance off Ickleton Road.
Biodiversity	Open space (circa 50%) on the southern portion to create a <i>“biodiversity rich setting”</i> . ²⁰⁴ Only 5 trees cut down with a 20% net gain in biodiversity. ²⁰⁵	Biodiversity loss (not quantified) due to the tree savagery needed to facilitate the access route. 29 trees to be cut down, mostly mature specimens.
Footway	Access to include a 2m footway connection.	None – just part of the new 6m access route.
Distance to nearest major settlement	7.2 miles (Bishop’s Stortford) but only 4.0 miles to Stansted Mountfitchet that offers extra services.	5.8 miles (Saffron Walden) but more spatially isolated versus other centres compared to Henham.
Topography	No significant hills: just <i>“subtle but nonetheless pronounced changes in the topography”</i> . ²⁰⁶ The 3 topographical surveys originally submitted in 2020 indicated the height range of the field was only circa 6 metres (at a height of 103-109m).	Some far more noticeable hills, whilst the height variation for the site itself is circa 9 metres, or circa 50% greater than for Henham.
Conservation Area	Not affected, due to the <i>“intervening twentieth century housing”</i> . ²⁰⁷	Due to the more noticeable hills, there are a range of viewing points giving a panoramic vista that includes the Church and other Conservation Area listed buildings. Including from the ancient Icknield Way.
Immediate area	The site abuts Vernon’s Close (immediately to the north) and other modern housing off School Lane & Mill Road. This had already extended the built form of the village to the south and west <i>“beyond the older elements of the village”</i> . ²⁰⁸ No listed buildings near the site.	The site runs parallel to Ickleton Road, with no new building in the immediate vicinity here since the creation of Elm Court in circa 1980. 2 listed buildings close to the site.
Impact on local views	<i>“Substantial”</i> .	Massive, especially from the public rights of way on/near to the opposite ridge, including the Icknield Way.
Harm to character of the area	<i>“Moderate”</i> , as per the Planning Inspector.	Massive in the view of most Elmdon residents.

²⁰² The Planning Inspector noted how *“the bus service provides a comparatively good service for a rural network”*

²⁰³ As was identified in the Planning Inspector’s assessment of 30th November 2021

²⁰⁴ The February 2020 Planning Statement

²⁰⁵ The above Planning Inspector’s report

²⁰⁶ Cited in the Planning Inspector’s assessment above

²⁰⁷ Cited in the Planning Inspector’s assessment mentioned

²⁰⁸ Again, cited in the Planning Inspector’s appraisal

Planning obligations by applicants	£41,000+ for primary and secondary education plus £5,600+ for monitoring fees.	None evident.
Existing recreational space	Open to all but a risk it could be withdrawn.	Excellent and recently extended via a new 7 years lease.

- Paragraph 4.125: The Planning Statement made much play of a comment that appeared in a UDC-commissioned study to support the prior Henham planning permission refusal. This stated that *“The Council does not regard development boundaries as inviolate....”*. A reference to the remarks of the highly experienced planning partner in Hutchinsons.²⁰⁹ However, it is also important to bear in mind this expert’s comments in the very same paragraph 5.34 that: *“The NPPF does not provide carte blanche to develop in the countryside (and in unsuitable locations) despite the fact that the Government has an objective of significantly boosting the supply of homes”*. It is surely also the case that there are degrees of violation. So if, say, a suitable village site came along that was genuinely sustainable and was 75% positioned within the development limits then conceivably UDC’s planners might feel this could be sanctioned despite the 25% violation factor. Whereas with Elmdon it is the case that the violation factor is 100% (as none is within the development limits) and the village is demonstrably unsustainable too.
- Paragraph 5.1: It is stated in the conclusion that the site is in a *“location which has good access to local services and in particular many of which would be accessible on foot”*. Perpetuation of similar myths is why some still believe in the existence of the Loch Ness Monster!
- Paragraph 5.3: Mention is made of how Grange Paddock would offer *“...support for local community facilities and the opportunity to deliver biodiversity net-gain...”*. As noted previously, the need for the communal facilities offered is unproven – there was no survey of Elmdon residents by the applicants, whilst the pre-application consultation was perfunctory in the extreme. Strangely too, a mention of ‘biodiversity net-gain’ suddenly appears which does not feature anywhere within any of the specialists’ reports on the site and despite the savage tree loss previously commented on from the development of the planned new access road.

The recent (6th February) Appeal Decision of the Planning Inspectorate may have some bearing on Grange Paddock. This is summarised in Appendix C.

²⁰⁹ Page 19 of the Appendix C that the applicants submitted

Appendix A: The Poster Used For The Short Notice Pre-Consultation Meeting



**OPPORTUNITY TO PREVIEW
A PLAN FOR INCREASING VILLAGE AMENITIES AND
HOUSING OPPORTUNITIES
FOR ELMDON**

FRIDAY 17TH JUNE 2022

4-30PM – 7-30PM

AT ELMDON VILLAGE HALL

APPENDIX 2 Summary of process

Village Design Statement (VDS) Process Timeline

Time Line	Stages of the Project	Consultations
March 2016	Steering Group formed	Parish Council (PC)
May 2016		Meeting with RCCE (Rural Community Council of Essex)
June 2016	Formed Working Agreement for Village Design Statement (VDS)	
June 2016		Informed villages about proposed VDS through flyers door to door and article in Gazette magazine
August 2016		Discussed VDS at PC meeting
January – July 2017	Drafting of questionnaire	RCCE comments on draft questionnaire
August 2017	Trial questionnaire	
September 2017	Questionnaire circulated	Notice to villagers in Gazette magazine
October 2017	Analysis of response to questionnaire	
November 2017	Exhibition of results and comments	Duddenhoe End Village Hall and Elmdon Village Hall
January – December 2018	Drafting of VDS	Consultation with Uttlesford District Council (UDC)
January 2019	Proposed publication draft	Sent to Parish Council for comment
February & March 2019	Exhibition of proposed publication draft of VDS	Duddenhoe End Village Hall and Elmdon Village Hall
March 2019	Review of comments	Review with RCCE and UDC
May 14 2019	Approved by Parish Council	
June 2019	Approved by UDC	

Appendix B (Above): The Extensive Consultation For The VDS

Appendix C: The Appeal Decision Of The Planning Inspectorate For The Grange at Clavering

This dismissal of the prior appeal was published on 6th February 2023 after a site visit undertaken on 16th November 2022. The proposal here – refused previously by UDC on 24th March 2022 – was for a new access road and the construction of 9 properties within the rear garden of the retained ‘mother’ property (The Grange). The site is one of c.0.8 hectares (circa 2 acres). Only the eastern part of the site lies within the village boundary of Clavering, with the majority to the west within the open countryside. The grounds of the appeal by the applicant included: the fact that Clavering is seen as a sustainable village location; it has a thriving community; and prior approval had been granted for a nearby development.

There are potentially some read-across points here for Grange Paddock. Note especially how:

- Policy S7 was seen as applying to the area of the site that *“lies in the countryside and is protected from development”*.²¹⁰
- The Inspector assessed that the site *“...would be surrounded on 2 sides by arable fields and would be a stark incursion into the rural area being highly visible from both the south and west. It would not protect or enhance the area”*.²¹¹
- It was concluded that *“the appeal scheme conflicts with Policy S7 given its encroachment into the countryside and impact on its rural character”*.²¹²
- As regards the 2005 LP, the Inspector noted that ***“The fact that policies are considered as out of date does not mean that they carry no weight...it is perfectly possible for policies which are deemed out of date for reason of an inadequate land supply to still carry significant weight”***.²¹³ I have added the bold highlighting here.
- Whilst only *“moderate weight”* was accorded by the Inspector to Policy S7 under the NPPF, he assessed that *“other policies in the Framework do not support the appeal scheme”*.²¹⁴

²¹⁰ Paragraph 8 of the Appeal decision by the Planning Inspectorate

²¹¹ Paragraph 9

²¹² Paragraph 12

²¹³ Paragraph 14

²¹⁴ Paragraph 19

Appendix D: Photographic Evidence

The view from the top of Hollow Road



Note the glimpse of the Church c. 1 inch middle right of the gas post and Grange Paddock to the r.h.s of the large tree above the track. Tree removal would increase its visibility here.

Recent traffic backed up behind the dustcart along Ickleton Road



The ridge 'sweep' heading down the bridle path that links to the Icknield Way



Grange Paddock is extremely prominent here.

Dog walking nr Elmdon Church showing the wooded village setting



How 2-storey houses will tower over Ickleton Road properties



Note the thatched roof of Grade II listed ‘The Hoops’ from beyond the pony paddocks.

The view heading down the footpath towards the alpaca farm



Another place where Grange Paddock would be plainly visible – note the grazing horse above the gate.