



13/03/23

Inquiries and Major Casework Team,
The Planning Inspectorate,
3rd Floor, Temple Quay House,
2 The Square,
Temple Quay,
Bristol BS1 6PN.

Dear Sir/Madam,

Objection to Planning Application S62A/2023/0015 - Grange Paddock, Ickleton Road, Elmdon, Essex

I write to object to the above S62A planning application at Elmdon. The applicants' documentation is absolutely littered with inaccuracies and obfuscation. I have therefore deemed it necessary to go through much of this point by point to refute, hopefully clarify and/or oppose many of the claims. I apologise to the Inspector for the consequent length of my objection letter. I have used the applicants' numbering system, for ease of referencing. I then add further remarks. Finally, I summarise my objections for the Inspector.

1. Comments re: 001 EXISTING SITE AND LOCATION

https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/1135337/001_EXISTING_SITE_AND_LOCATION_Redacted.pdf

The wide unmade path shown on the map as starting along the Ickleton Road opposite Manor Row and The Hoops does not exist. The problem seems to have arisen from the [UDC Constraints Map External \(arcgis.com\)](#). At a certain magnification, it is clear that "Path (um)" refers to a dotted line which starts opposite the boundary between 1 and 2 Ickleton Road (to the E of The Hoops.) It then follows the line on the eastern side of the area marked "Path (um)". When further magnified, it then appears as in the drawings. This has been exploited by the applicant to their advantage, as is clear below. I cannot find any evidence, save for this map, that this path has ever existed. It may have been confused at some point with the path which certainly used to exist from the entrance to Alfred's Shott, which then ran as a straight path in a NNW direction, past a small chalk pit and up to intersect what is now the main drive of The Grange, Elmdon (which also used to be a path along the chalk ridge down to Royston Lane.) The area marked as "Path (um)" is bounded along the Ickleton Road by a substantial hedge. The area itself is covered in mature and semi-mature trees. The ground surface is rough, uneven and fully vegetated. (See photo below. The Hoops is the thatched cottage in grey. Note the lack of footpath!)



2. Comments re: 002 PROPOSED SITE PLAN

https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/1135338/002_PROPOSED_SITE_PLAN_Redacted.pdf

- (a) The path referred to in Note 1 is here clearly delineated in white. This is most misleading, as it looks as if it already exists: it does not; nor does it appear to form part of this planning application, being outside the site boundary and receiving no mention of reinstatement. There is **no** proposed footpath to the site separate from the proposed access road, which itself shows no indication of a separate footway for pedestrians.
- (b) The Telephone Call Box (TCB, now a Listed structure) is on the other side of the Ickleton Road.
- (c) The existing driveway which serves Alfred's Shott has been left off the proposed plan, save the very bottom, where it meets the Ickleton Road and would seemingly be widened to form the access to the proposed site. The safety implications of the junction of this driveway with the proposed access road and with vehicles turning off the Ickleton Road onto the site access are explored in my comments re TS 2.8 on The Transport Statement (TS). Would drivers coming out of Alfred's Shott and those turning off the Ickleton Road onto the proposed site road be able to see each other in time? Looking at the red lines on the Existing Site and Location map, which **does** show the driveway, this seems questionable in practice (how many drivers cut corners?), although the existing access does look to have been widened below the intersection point – perhaps with this in mind? However, the situation seems very dangerous to me.
- (d) The proposed footpath to the proposed children's play area appears to lead directly from the Ickleton Road. Please note, however, the ambiguous curved area, separated from the straight-edged proposed path by a line across the proposed path. This may easily be read as forming part of the footpath, but it runs on land which does not belong to the applicants. It is currently a grass verge (very long grass in summer), with a ditch between the verge and the private land belonging to

Robert Smith of Rocol Estates. (See photo.) If the footpath had to come off Farm Drive (the turn off the Ickleton Road adjacent to the start of the proposed footpath), it would be highly dangerous: this is a very dangerous access for vehicles onto/off the Ickleton Road. Vehicles often have to turn blind up Farm Drive, from the wrong side of the road onto the wrong side of the Drive due to parked cars on the Ickleton Road. There is no guarantee that a motorist would see any children and/or their parents trying to reach the proposed footpath from the lower part of Farm Drive.



- (e) There is no footpath from the housing of the proposed development to the proposed children’s play area.
- (f) I am not at all convinced that there is any need for a children’s playground in the village: there is the wide open space of the cricket ground and many houses in the village have gardens large enough to house play equipment of this nature. There is also a fully equipped playground on the recreation ground next to the primary school at the next village, Chrishall, and a play area within the school grounds. The adjacent facilities are often used by the school. This school and its pre-school are attended by many of the children of these age groups from Elmdon (via private cars or the school bus service).

3. Comments re: 005 EXISTING AND PROPOSED SITE SECTION

https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/1135340/005_EXISTING_AND_PROPOSED_SITE_SECTION_Redacted.pdf

- (a) There is no scale to show the height of the token person, or anything else, which renders it meaningless. (It says it is “A Sketch”.)
- (b) The existing hedge has been allowed to grow up high (possibly all the more so for the purpose of the application: the person trimming it was forbidden to cut it below a certain height this year.)

- (c) There are currently no trees in the field forming the proposed housing site. No trees are proposed to be planted on the site side of the hedge, according to the proposed site plan. (Even if they were, they would not thrive adjacent to an established hedge and could easily die. (See photo) There are only trees proposed for the central public green space of the development.



- (d) The photo below from the site shows that the houses on the S side of the intended development would be much higher than the existing houses on the opposite side of Ickleton Road. They would also overlook the bedrooms of the existing Ickleton Road homes, including from the downstairs reception rooms at the rear of the new dwellings. The recent case of the Tate Gallery's viewing platform overlooking the apartments of the tower block opposite is illustrative that such invasion of privacy should not be allowed to happen. (See also Appendix B.) The rise in the land from the hedge to the first dwellings mean that these proposed houses would be extremely high in relation to those on the Ickleton Road. They would be overbearing in relation to the existing properties.



4. Comments re: the Application Form (AF)

https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/1135429/Outline_Some_Matters_Application_Form_Redacted.pdf

Re AF 5: No pre-application advice has been sought from the LPA, presumably as the applicants could predict that Uttlesford District Council (UDC) would be against such a proposal for this green field site outside village development limits in an elevated position, damaging to the landscape and the character of the village. (The recent UDC Committee Meeting at which the application was discussed, proved that UDC oppose the application.)

Re AF 6: A new pedestrian access is ostensibly being sought from the public highway to the children's playground; however, it is unclear how this is proposed. Such has NOT been sought for the proposed housing development, even though that would be needed, as the applicant has made it appear as if such already exists: it does not. (See my remarks under 002 PROPOSED SITE PLAN)

Re AF 13: (a) It is indicated here that the pond is NOT for drainage, but the drainage documentation says otherwise (see 5.10 of the SuDS report, which states that it would "collect outfall from the permeable paving system.")

(b) It is also stated that the proposal is NOT within 20m of a watercourse, but there is a ditch adjacent to the site at the base of the hedge and bank along Ickleton Road. A ditch clearly IS a watercourse and this one is certainly **well** within 20m!

(c) It is also admitted by the applicants that the development would increase the flood risk elsewhere. This would mean along the Ickleton Road and Elm Court, already prone to flooding. This is surely unacceptable.

Re AF 14: (a) it has been stated that there is no "reasonable likelihood" that Protected and Priority species would be affected adversely within the application site, or on land adjacent to or near the application site. This is incorrect: there is a badger sett **very** nearby which looks to be active. Certainly, badgers have regularly been seen there, including with cubs in the Spring. At least one barn owl regularly hunts over the paddock. Bats frequent the area. It is within 500m of a pond which may be a breeding pond for Great Crested Newts. Other similar ponds are not much further away.

(b) It has also been indicated that there are no designated sites, important habitats or other biodiversity features likely to be affected, yet the proposal involves cutting down ca. 30 trees in Town End Plantation, which is part of the Woodland Priority Habitat Network (England), receiving a High Spatial Priority classification (see MAGIC maps.)

5. Comments re: the Planning Statement (PS)

Site Description and Location

Re PS 2.4: "There is presently an existing access into the site via a track adjacent to the western boundary which leads to other dwellings to the north. There is also an indicated informal footpath heading northeast from Ickleton Road passing through the site, along the eastern boundary of the proposed developed area. However, that is not a statutory right of way. The green lines within the above Application Site Settlement

boundary (2005 Local Plan) Conservation Area boundary Grange Paddock Jon Durbin Assocs Ltd Planning statement extract from the LPA constraints map indicate public rights-of-way, and there are none in the vicinity of the application site."

- (a) The "track" is called Farm Drive.
- (b) The informal footpath does not exist. (See my remarks on 001 EXISTING SITE AND LOCATION and 002 PROPOSED SITE PLAN above.)
- (c) There are a number of public footpaths and bridleways on the opposite hillside, all readily accessible from the village and affording extensive views of the site – some sporadically or only for a short distance, some (the Icknield Way and the path leading from Hollow Road) for much longer.
- (d) The Conservation Area of the village is ca. 0.05 miles from the site, as measured on MAGIC maps, so is quite close to it. local-plan-2005-inset-maps-colour.pdf (uttlesford.gov.uk)

Re PS 2.7 There are archaeological sites within 0.07 miles (at Great Harvesters) and at 0.08 miles, behind The Glebe and other homes on the S side of the Ickleton Road. [UDC Constraints Map External \(arcgis.com\)](#)

Re PS 2.8 The applicants claim that *"because of the location of the development, there would be no impact upon the protected lane and its character."* How can this be true?

(a) The applicants propose a new speed sign and "gateway" urbanisation measures for the Protected Quickset Lane (UTTLANE3)! This lane received a score of 20 in the Uttlesford Protected Lanes Assessment (March 2012), scoring the maximum possible through field assessments of its diversity, historic integrity and aesthetic value, plus a desk assessment of its archaeological association (Pg. 18 & 29 of that Assessment). [Uttlesford Protected Lanes Report](#) The Landscape Character Assessment of this H1 area recommends by way of management, *"Conserve historic lanes and unimproved roadside verges."*

(b) Moreover, given the necessary tree felling to enact this development and that the site is so elevated, it would adversely alter the character of the village on this approach from the E along the Protected Lane.

Planning History

Re PS 3.1: (a) There are a number of planning consents which directly impact upon the site because of the proposed footpath to the proposed children's play area and public green space. Comments on these from my husband and I partly concerned the dangers of the access to what is now named Farm Drive. (We live at Great Harvesters, accessed from Farm Drive.)

(b) In the 2015 Call for Sites, this site was put forward as 01ELM15. It did not make it beyond submission stage when the LPA considered which sites were to be put forward to the next stage of the then intended Local Plan.

Re PS 3.2: I shall later demonstrate that the cases of Manuden and Henham to which the applicants later refer, are completely different from the situation at Elmdon.

The Applicant's Case

Re PS 4.1, 4.2, 4.5: I contend the applicant's conclusions, as detailed below.

Re PS 4.12- 4.14: (a) The applicant accepts that the application is contrary to LPP S7, which states that, *“In the countryside, which will be protected for its own sake, planning permission will only be given for development that needs to take place there, or is appropriate to a rural area.... There will be strict control on new building. Development will only be permitted if its appearance protects or enhances the particular character of the part of the countryside within which it is set.”* I contend that this proposal does not need to take place here and would be very damaging to the character of the local countryside. The site is elevated well above the Ickleton Road. It is on the steepest part of the hillside and would take ca. 1/3 of this hillside by area. The fall on the site alone is of the order of 6.5-7m. From the O.S. 1:25:000 map, it can be seen that the top of the ridge on this side of the valley is at 115m, but that it rapidly drops away north-eastward to 100m, then more gradually to the 95m contour. The 110m contour runs through the NW corner of the site, as one can see from the Topographical Survey, so close it is in terms of height to the top of the ridge. Therefore, due to the elevation of the dwellings, particularly those on the N side of the proposed green, the height of the finished houses would almost entirely block out the views of the remainder of the hillside, rendering confined and urban what is now an open landscape with a sense of space. A line of newly planted trees marks the ridge, as can be seen from the photo below. The hedge running parallel to it is the top of the application site. The newly planted trees are along the main drive to The Grange, which was a conversion of a former grain store and dryer. It was permitted under UTT/13/0911/FUL. At the time, it seemed good use of a redundant agricultural building. However, one of the current applicants lives there and has since cut down many trees which once screened the former building somewhat and has opened up the site, which was assessed at the time by UDC as being confined to the area behind a hedgerow to the E of the building and reasonably screened (see the Site Plan for that proposal.) The house is now highly prominent in the landscape which irritates me every time I go for a walk on footpaths of the opposite hillside. Please do not allow the landscape to be further damaged – indeed, locally destroyed - by the proposed development. See Appendix D for a small indication of what would ensue, should the development be permitted.



(b) With regard to UDC not meeting its 5 year land supply, it is noteworthy that forthcoming revisions to the NPPF will do away with this requirement under most circumstances. Furthermore, I have studied the applications made to and granted by UDC since April 2022, when the last land supply figures were calculated for the District. At that point, Uttlesford District was 78 houses short of meeting its 5 year land supply target. Since then, many applications for additional dwellings have been granted permission by the LPA. I ensured that I was not double-counting (eg. OPP and FUL for the same site) and that I took account of dwelling losses (e.g. where one existing dwelling was to be demolished and replaced by 2 new dwellings.) I only had to look from 13/02/23 to 14/11/22 to establish that UDC has granted permission for a significant number more than the requisite 78 houses, and suggest that it is now likely to have exceeded its 5 year land supply. The new proper annual calculation will be made in April 2023 and it is expected by those who know about these things that UDC will then meet its 5 year land supply. As of April 2022, the official figure stands at 4.89 years.

Re PS 4.15: The applicant claims that the site does not display the attributes of the local landscape: *“Elmdon Chalk Uplands Landscape (H1) where key features comprise rolling chalk upland landscape of broad ridges and panoramic vistas that contrasts with winding sunken lanes and intimate tree enclosed villages. There is a sense of space and openness with large scale rectilinear field pattern on the uplands.”* I strongly believe that the site DOES display the attributes of the local landscape:

- (a) The site forms part of the panoramic vistas from the footpaths and bridleways to the south of the site, especially from the Icknield Way. It contributes significantly to the sense of space and openness. The Landscape Character Assessment [LCA 8 Uttlesford.pdf](#) describes the area thus: *“It is a landscape of big sky and seemingly continuous views on the higher ground”*...The *“overall impression is one of openness, with...little visible settlement.”* The area enjoys *“Distinctive elevated broad flat-topped ridges”* just like the one which would be pretty much blocked from view by the proposed development! *“The open nature of the skyline on the ridges of this upland landscape is visually sensitive to new development, which may be visible within panoramic views across the fields,”* the author warns.
- (b) With most of the village in the valley, or radiating out in a linear fashion along the road as the High Street becomes Essex Hill, the proposed estate development on the hillside would rear up into and destroy the sense of open countryside in the vicinity of the village.
- (c) The village contains a good number of mature and young trees, the Town End plantation forming a noticeable contribution thereto.
- (d) Chris Blandford Associates provided UDC with this Landscape Character Assessment in 2006. The H1 area in which Elmdon is located even bears the name of the village: *“Elmdon Chalk Uplands”* Landscape Area, so typical is Elmdon of this (fairly limited and therefore to be much valued) landscape type. How, then, can the applicants claim that the site displays few of the characteristics of the area?!!! The character description of this area continues, *“The <field> pattern is more organic and irregular on the lower slopes and around settlements. Land is used mainly for arable farming, although there is some pasture near villages, particularly for horses.”* Until the sale of the Elmdonbury estate (predominantly to one of the applicants in ca. 2004) the site formed part of the large agricultural field which lies immediately to its N and which extends up to the chalk ridge on that side of the valley. What was presumably a sub-sale to the then owners of Alfred’s Shott led to

the erection of the post and rail fence and the subsequent hedge planting alongside it, plus its conversion to grassland.

- (e) He continues, *“This countryside has a rich cultural heritage, and villages like Elmdon have exemplary historic buildings.”* The Hoops, directly opposite the site, is one of these and such *“timber-framed houses with thatched roofs are the local vernacular in the whole area.”* Then a warning: **“The overall sense of tranquillity within the character area is also sensitive to change and potential new development. There is also a strong sense of historic integrity, resulting <from> several visible historic buildings”** *“Overall this character area has relatively high sensitivity to change.”* (my emphasis.
- (f) Overall, the landscape character, with which the application site is consistent, enjoys a *“strong sense of place.”*
- (g) Suggested Landscape Planning and Management Guidelines are to:
- *“Conserve the rural character of the area”* and to
 - *“Conserve and manage areas of ancient and semi-natural woodland as important landscape, historical and nature conservation sites.”* This would presumably include the Town End Plantation.
 - *“Ensure that any new development **responds to historic settlement pattern, especially scale and density**, and that use of materials, and especially colour, is appropriate to the local landscape character; **such development should be well integrated with the surrounding landscape.**”* (My emphasis.) The proposal flies in the face of these Guidelines.

Re PS 4.17: Claims (a) that the site doesn’t form part of the large-scale rectilinear field system, but it did until recent years, as mentioned above. If undeveloped, it could easily be re-incorporated to resume the historic pattern, should the land ownership eventually revert to being under one owner, as it was until ca. 20 years ago. See [Historic Ordnance Survey Map of Elmdon, 1896 - 1948 \(francisfrith.com\)](http://francisfrith.com)

(b) That the village is not “tree enclosed”. It is not **hidden** by trees, certainly, but there are many trees in the village and it is surrounded by patches of woodland, much of it ancient woodland.

(c) The site certainly **would** protrude into the landscape, were it developed! It is over 2 metres from the Ickleton Road to the base of the hedge forming the boundary of the field with that road. As addressed in my remarks on PS 4. 13-14 above, the site rises quite steeply an **additional** ca. 7m and the ridge above it is not greatly higher than the site itself, even at its highest point, as established earlier. (See Appendix D).

Re PS 4.18: A claim made that *“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.”* Note **“could”**. Also, these houses would still be prominent. The proposal shows a number of small trees in the central green space. These couldn’t be too large because of their proximity to the proposed dwellings. Even with a few new trees near the proposed recreation ground to the W. side of the site, this wouldn’t significantly soften the impact of the proposed development. There is already a young woodland (22 years old) near the W side of the site and it can be seen that there would be no softening impact from that.

Furthermore, as I mention elsewhere, any new tree or shrub planting in the vicinity of the existing hedges or trees would not thrive, even if it survived.

Re PS 4.19: The claim is that “*there are no public footpaths within the vicinity, particularly to the north of the site.*” This is clearly false.

- (a) The prominent site can be clearly seen from a substantial part of the Icknield Way footpath and bridleway, which runs along the ridge of the opposite hillside to Freewood Farm. This is only one of the most important historical footpaths in the country! Furthermore, there is an extensive unimpeded view of the site from the Scheduled Ancient Monument of the Mill Mound, adjacent to this public right of way. The Grade II* Listed village church can be clearly seen along with the proposed development site and some of the Conservation Area, including the Listed Barns at Elmdonbury. (See photo below. Part of the site is shown in red.)



- (b) Additionally, the site can be clearly seen from the upper reaches of the footpath/bridleway which descends to the village from the Mill Mound.
- (c) It can also be seen from the footpath leading from near the bungalow by Piggots down to the village.
- (d) Further views of the site are afforded from the public footpath leading down the hill towards the village from the point where the Icknield Way turns sharply towards Strethall by the Ancient Woodland of Free Wood. (The former footpath becomes Hollow Road.) At one point, near the gas pipeline route, the Grade II* Listed church can be seen in the same view. The proposed development site would become even more visible from this path if trees were cleared to provide the site access road.



In summary, the site is highly visible from all the public footpaths and bridleways in the immediate vicinity of the village to its south, particularly from the historic Icknield Way, and would affect the setting of a number of Listed Buildings and a Scheduled Ancient Monument. If developed, it would also be visible from the pavement along Ickleton Road, Hollow Road and Horseshoe Close.

Re PS 4.20: It is asserted regarding the surrounding countryside that *“there isn’t a degree of unusual special attributes that would give it a more elevated landscape value. For example, none of the landscape is subject to any additional level of protection and there are no major visual effects expected from the development, and the effect on the local landscape would reduce to a modest level in the longer term.”* This is also incorrect:

- (a) There are a number of Ancient Woodlands in close proximity to the village, including Free Wood to the S. and Park Wood to the W.
- (b) Quickset Road, a few metres from the proposed entrance to the site, is a Protected Lane (See UDC’s Protected Lanes Assessment, March 2012). Quickset Road (UTTLANE3) is given a top score under the “Aesthetic” field assessment, historic “Integrity” and “Diversity” categories. Hertford Lane, leading NW from the village, is also a Protected Lane and there are several more between Elmdon Wenden Lofts (the Pond Streets) and Duddenhoe End. (UTTLANE1, UTTLANE2, UTTLANE15 – 19 and UTT22. There are more out towards the hamlet of Strethall.
- (c) The UDC’s Constraints map [UDC Constraints Map External \(arcgis.com\)](#) shows the Protected Lanes and the Ancient Woodland. The MAGIC map shows that these woods, plus the one comprising Townend Plantation itself. Another small woodland between there and Free Wood, are part of the Woodland Priority Habitat Network (England). [Magic Map Application \(defra.gov.uk\)](#)

Re PS 4.21: The applicant states that *“there would be a limited degree of harm in terms of landscape character from the proposed development”*. They attempt to justify this *“because of the proposed site boundary limitations reflecting and respecting existing settlement”*. The boundaries do **not** respect or reflect the existing settlement boundaries at all:

- (a) This site is outside village development limits.
- (b) It would be **by far** the largest development **ever** to go ahead in this tiny village: (i) Horseshoe Close was built in the 1980’s as a **Council housing** development of 8 semi-detached dwellings, comprising 4 buildings. At this time, a couple of extra buildings (2x2 semi-detached properties were added to Hollow Road by the council. If you count them all as one development, that is 12 houses, the most Elmdon has had built at any one time. (ii) The Ickleton Road **Council Houses** were built in 1948. They comprise 6 semi-detached dwellings (so 3 buildings), all fronting the Ickleton Road. (iii) Elm Court (market housing), which was built in the 1970’s as a small courtyard of 5x 4-bed detached houses, with 6 smaller semi-detached dwellings fronting the Ickleton Road, totalling 11 dwellings. (iv) The Glebe was built as **Council housing** in the 1920’s. It comprises 6 semi-detached homes in 3 buildings.
- (c) The proposal would therefore contravene Local Plan Policy (LPP) GEN2, which says that a development must conform to the *“scale, form, layout, appearance and materials of surrounding buildings.”*

(d) The whole Parish of Elmdon with Wenden Lofts, which includes the hamlet of Duddenhoe End, has 611 residents (2021 Census).

<https://uttlesford.moderngov.co.uk/documents/s12945/Enc.%201%20Elmdon%20Village%20Design%20Statement.pdf> (pg. 4.) I estimate about a third of these live in Duddenhoe End, so Elmdon only has about 350 inhabitants, living in ca. 147 homes.

(e) If the application were passed, the development, on such relatively high land, would tower above most of the village dwellings, which are predominantly in the valley along the Ickleton Road and along the other roads (High Street and Heydon Lane) which radiate from near the church. This would be counter to LPP GEN2, which says that a development must not have an “*overbearing impact*” on other residential properties. Furthermore, Elmdon is a nucleated settlement in a valley, surrounded by rolling chalk upland, interspersed with ancient woodland. This proposed development would significantly harm the character of both the village and the landscape.

Re PS 4.23: “*Policy GEN2 of the 2005 Adopted Plan sets out that development will not be permitted unless its design meets certain criteria. In particular, new built form should have regard to the scale, form, layout, appearance and materials of surrounding buildings.*” This proposal does NOT have regard to the **layout** of the surrounding buildings. There is **no** such loop-style estate in the village and the development is much larger in **scale** than any heretofore. The application is therefore counter to GEN2.

Re PS 4.24: Note that the applicant realises that it is “***fundamental to the acceptability of the scheme***”, (my highlighting) that “*the layout would have clear and direct regard to the pattern of the settlement.*” To reinforce this misleading statement about the proposed layout, the applicant gives a couple of supposed examples of like in the village: Horseshoe Close and Elm Court.

(a) There are no closed loop roads in the village. Moreover:

(b) Horseshoe Close consists entirely of council dwellings, with 2 x 2 bedroom semi-detached bungalows, plus a semi-detached bungalow-house on the S side and 2 X 3 bedroom semi-detached houses forming the building at the far end. (4 buildings in total). The dwellings on the N side were built many years earlier, fronting the Ickleton Road, and it is only the fences of the back gardens of these dwellings which bound the N. Side of the close. (The buildings at the entrance to the close are semi-detached dwellings fronting Hollow Road. They are not part of Horseshoe Close and are side-on to it.) Horseshoe Close is therefore absolutely NOTHING like the proposed development! The photo below shows the dwellings on Horseshoe Close.



(c) Elm Court is 3 and 4 bedroom market housing. It *includes* a very small cul-de-sac (2 detached dwellings on each side and one at the bottom), which was built on brownfield land (a former butcher's yard) but the majority of these properties front the Ickleton Road. I cannot see **any** semblance between the layout of these properties and what is proposed in this application. The photo below shows the courtyard part of Elm Court. The right hand side mirrors the left, with the one house at the bottom.



The photo above shows the sort of houses in Elm Court which front the Ickleton Road.

Re PS 4.26:

- (a) the applicant claims that *“the dwellings would be set back from the main road and behind the existing mature hedgerow, which would be further enhanced by way of additional landscaping. This would ensure that those dwellings would not intrude into the street scene or into the outlook of those dwellings on the south side of the main road.”* The proposed dwellings would not front the main road, but the proposal is for those closest to the road to have their rear gardens nearest to the road.
- (b) If the existing hedgerow is to be *“further enhanced”*, what is meant by this vague term? It is already a very thick, high hedge. No trees are shown on the site plan as being planted along it. Even if they were, from my own experience, trees or shrubs planted next to well-established hedging does not tend to thrive, (see photo in section 3 of this document) as the much larger root systems of the established plants deprives the newer shrubs/trees of water and nutrients. It is therefore unlikely that anything planted by this hedge would be successful in shielding the outlook of the dwellings on the S of the Ickleton Road; nor would they be likely to soften the appearance of the houses from the street or wider countryside.
- (c) The PEA states that *“ it is recommended that very significant additional planting be undertaken to reinforce existing boundary hedges and tree lines, replace trees lost to the proposal and plant new tree buffer zones and hedgerows where there are currently no such features.”* (Pg 19) and *“New and replacement tree and hedgerow planting as appropriate”* (Pg. 21), but what guarantee is there that this would be undertaken? Even if it were, if we had a summer anything like 2022’s following the planting, little would survive without much care and attention. It seems unlikely that it would receive such.

Re PS 4.31: Lighting.

- (a) Even if bat-friendly lighting were to be used within the estate, and other lighting curtailed as the PEA recommends (Pg 20 & 21) , there would still be lighting which could be installed by the residents. Some people in the village leave their outside lights on all night; some don’t shut their curtains after dark, so light pollution spills out; some have spotlights. One of the applicants has a whole array of lighting to ensure his security cameras work, which is distressing to those of us who do not like light pollution and very damaging to wildlife. What is to stop residents installing these types of features later?
- (b) Elmdon is (or was before the applicant installed his lighting arrays!) surrounded by the next-to-darkest grade of skies in the country (0.25-0.5 Nanowatts/square centimetre/hour), according to the CPRE Dark Skies map. The village itself, including the site, is in the level above that (0.5- 1 Nanowatts/square cm/hour), due to light sources in the village (which only has street lighting on Horseshoe Close). There are 9 levels altogether. See [England’s Light Pollution and Dark Skies \(cpre.org.uk\)](http://cpre.org.uk) The development itself would generate much extra light and be detrimental to the environment and enjoyment of villagers, who like the dark streets.
- (c) The Essex Design Guide states that *“lighting will have to be maintained by building owners or management companies,”* with reference to private streets. Is this proposal for a private street, or

would it be adopted by Essex CC? If the former, this is another economic burden (via the management fee) on residents.

Re PS 4.33 and 4.34: My remarks concerning the applicants' points 4.21-4.31 demonstrate that the proposal is counter to GEN2, the NPPF and The National Design Guide 2021, as developments are required "to have clear regard to the character and form of existing buildings and settlements". This proposal does not meet any of these criteria. Therefore, there would be definite harm resulting from the proposed development.

Transport Access and Parking

Re PS 4.35: The Transport Statement for this proposed development is absolutely ridiculous! See my separate comments.

Re PS 4.36: The proposal states that, "The site's access is shown on the proposed site access. This drawing sets out the way in which the access road and footpaths would enter the site, and this is reflected in the Site Plan and Layout." How did the footpath become plural?!!!

- (a) A key point is that the access to the existing private dwelling of Alfred's Shott has been left off this drawing (and most other drawings forming the proposal.) This would appear to be deliberate. Please compare with the existing site plan 001, which is one of the few drawings which shows the driveway to Alfred's Shott. Then note how close the junction of the Alfred's Shott driveway with the proposed access road is to the junction of the proposed access road with the highway (Ickleton Road.) The Essex Design Guide [Home | Essex Design Guide](#) section on Visibility gives a table of safe stopping distances (SDD's) at different speeds, as below:

Derived stopping sight distances (SSD) for streets:

Kilometres per hour	16	20	24	25	30	32	40	45	48	50	60
Miles per hour	10	12	15	16	19	20	25	28	30	31	37
SDD (metres)	11	14	17	18	23	25	33	39	43	45	59

A diagram of the minimum forward visibility required is also supplied with this. A vehicle travelling W along the Ickleton Road and turning into the proposed development would conflict with any vehicle coming from Alfred's Shott as it emerged onto the proposed access road: there would be insufficient distance for either vehicle to stop in time. This creates a certain hazard and is therefore counter to LPP GEN 1, which states that the "design of the site must not compromise road safety."

- (b) Regarding pedestrian access to the proposed site, the proposed site plan is again VERY misleading. Please see my earlier comments under "001 EXISTING SITE AND LOCATION2" and "002 PROPOSED SITE PLAN." No footpath exists from the Ickleton Road to the site. What was once a footpath is now the entrance to Alfred's Shott. Although the old track beyond still exists, it would not give access to the proposed dwellings, being in a cutting and heading NNW to the old chalk pit and on to the large open fields behind Alfred's Shott. The white area where the footpath looks to exist on the proposed site plan is actually rough ground, overgrown with vegetation at ground level and covered by trees. There is no track there at all.

- (a) The statement by the applicant therefore shows absolutely **nothing** about how a footpath would enter the proposed housing site, unless pedestrians (and cyclists) are supposed to share the carriageway of the proposed vehicle access.
- (b) The proposed footpath leading to the proposed children's play area is problematic at the Ickleton Road end. Regarding this, please see my comment 2 (d) on 002 PROPOSED SITE PLAN (Pg. 1 of this objection.)

Re PS 4.37:

- (a) Note that the statement regarding access to the properties on foot can be interpreted in two ways: either the applicant is misleading the Inspector about the "existing" footpath serving the site, or the proposed vehicle carriageway would be shared, giving no separation between pedestrians, cyclists and motor vehicles. PS4.36, referring to "footpaths" would suggest the former. LPP GEN 1 c) states that the design of the site "*must take account of the needs of cyclists, pedestrians*", etc. Furthermore, GEN 1 d) says the site "*must be designed to meet the needs of people with disabilities if it is development to which the general public expect to have access.*" The applicant states that the green space proposed for the centre of the development would be open to the public. This shared carriageway takes no account of the needs of the public, disabled or otherwise. This proposal is therefore counter to GEN1.
- (b) Regarding the proposed footpath to serve the children's play area, please see my comment 2 (d) on 002 PROPOSED SITE PLAN (Pg. 1 of this objection.)

Re PS 4.38: *"Most significantly however is that the site is within very easy walking distance of the village centre. It is therefore the case that the development facilitates the use of alternative means of transport for access to local services. 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."*

- (a) Yes, the centre of the village is within easy walking distance of the site. However,
- (b) The logic is incorrect because there are no local services, save for a very small Victorian village hall, a church and a cricket ground, the latter being up Essex Hill. The only regular bus service (the 444) is **term time only** and serves the local secondary schools, one in Newport and one in Saffron Walden. It offers one bus in the morning and one in the afternoon, timed for normal school hours.) It is a mini-bus. The general public can use it, in principle, but it may well already be full of school children.
 - (i) The church in Elmdon holds a service once a month, being part of a rural benefice where the preacher has to rotate between 7 churches.
 - (ii) The village hall holds a weekly session in **term time only** for mothers and toddlers, called "The Music Box".
 - (iii) Once a month (usually) there is a coffee morning.
 - (iv) Once every two months, the Parish Council Meeting takes place there. (It alternates each month between Elmdon and Duddenhoe End village halls, as the village and hamlet are in the same parish.)

- (v) Apart from that, there are a few quizzes every year (ca.3 or 4, in more recent years) and the very occasional ad hoc event.
- (vi) There is often a cricket match one day at the weekend in the summer.

So how, exactly, does this negate the need for residents to travel by car for some day-to-day functions? It doesn't. This also renders the applicants' points PS4.39 – 4.42 meaningless. Particularly

Re PS 4.42: Manuden has a **pub, school**, vehicle repair shop and a barber. It was almost **twice the size of Elmdon** in terms of population when permission was granted under the Appeal referred to by the applicant. It has a large and extremely well-equipped **community centre** with meeting rooms, and many other facilities for sports, entertainment, clubs and functions. Importantly, it also has a **regular bus service** with many stops in the village, to and from Stansted Mountfitchet and Bishop's Stortford, **both of which are towns offering good shopping facilities and employment**. The **centre** of Stansted Mountfitchet is less than 2 miles away by road, so can easily be cycled to. A little further away, but still within cycling distance is the **centre** of Bishop's Stortford (3.75 miles.) Both these towns have railway stations on the main line between Cambridge and London. Bishops Stortford has fast and frequent trains to London and also regular trains for the short journey from there to Stansted Airport. The respective situations in Manuden and Elmdon are really **not at all** similar. In Elmdon's case, the village is NOT near any comparably major settlements, being ca. 6 miles to Saffron Walden and ca. 8 miles to Royston, and there are scant services in the village; therefore the proposal does NOT encourage "*movement by means other than driving a car*": it definitely does NOT accord with LPP GEN1 (e), nor with the NPPF.

Re PS 4.46: see my comments on 4.37. I see no indication of footpaths on the map of the proposal, other than to the proposed children's play area.

Re PS 4.49: please see my comments on the Transport Statement (TS). Note particularly:

- (a) There are no regular bus services passing through Elmdon. The nearest to a regular bus is the 444, which runs during term time only, tailored to school hours and terminates/starts at Saffron Walden County High School, which is on the near (W.) edge of the town, just under a mile from the centre of the town. Since it is timed to serve the school day, it is of very limited use to people, other than schoolchildren, even assuming there were space on this bus for them.
- (b) The routes used by regular buses serving Ickleton are a ca. 15-20 minute cycle ride away from the village, over hilly terrain which is untreated in winter and impassable by this means in icy or snowy conditions. There is no cycle storage at the nearest bus stop and a rack for only ca. 3 cycles right by Ickleton village shop – presumably intended for the use of customers from Ickleton itself. These are clearly not meant to serve the nearby bus stop.
- (c) No-one from Elmdon is realistically going to use these buses. Indeed, when we were trying to find a family fleeing war-torn Ukraine to host under the Homes for Ukraine scheme, we repeatedly fell at the hurdle of the lack of public transport from Elmdon: even war refugees didn't want to be in such a poorly connected location! (We did find a family to host in the end, but they drove from Ukraine in their own car so that they would have transport when they arrived in Elmdon.)
- (d) Regarding train services, people from Elmdon tend to use Audley End station (5.2 miles away by the shortest route, according to Google Maps), rather than Great Chesterford (4.2 miles away) as: (i)

more trains stop there than do at Gt. Chesterford; (ii) there is plenty of parking (Gt. Chesterford has none); most people from Elmdon head to/from London if using the train and Gt. Chesterford is further from London by train than Audley End. Note also, that station parking has now become so expensive that some people drop off their rail-commuting family member(s) at Audley End in the morning and collect them in the evening, generating twice as many vehicle movements for this purpose in recent years. It is almost certain that anyone travelling from Gt. Chesterford railway station would have a similar arrangement, due to the lack of parking and few cycle racks. Gt. Chesterford lies beyond Ickleton. Getting there also involves the same untreated hill (the county boundary is at the top of this hill) as it would by bicycle, rendering travel by that route difficult and hazardous or impassable in winter ice/snow - at least if one doesn't have a 4 x 4 vehicle.

- (e) The transport model (TRICS) used is a clear case of GIGO (Garbage In, Garbage Out) in relation to Elmdon. The extra number of motor vehicle journeys realistically to be expected from the proposed development is ca. 100 per day, using the actual vehicle measurements submitted for the Ickleton Road and the expected number of cars attributable to the number of proposed dwellings. (See my detailed comments on the TS)
- (f) There have been a number of accidents in the last 5 years within 2 miles of the site, several serious. Crash Map shows 2 serious accidents between 2017 and 2021 at/near the Quickset Lane/Royston Lane crossroads. We know of 2 more there since the crash map was last updated: on 12th November 2022, we were coming back from near Cambridge and found the Quickset Lane/Royston Lane crossroads blocked off by police following an accident which looked quite serious; we know the wife of one of the people involved in another crash at the same site in December 2022. (The latter was, thankfully, a minor accident.) This crossroads is notorious within the village as an accident black spot. It is only 0.9 miles from the site and any eastbound traffic would have to traverse it.

Re PS 4.5: (i) The proposed vehicle site access is dangerous, as the applicant has apparently told the person preparing the TS. (I explore this in detail in my remarks on the TS.) It is close to a bend where one would also have to watch out for traffic coming from Hollow Road. There have apparently been a number of near misses there already. With greatly increased traffic coming from what is currently the access to Alfred's Shott only, it would only be a matter of time before an accident actually occurred. The probability of accidents occurring would also be further hugely increased by the relative position of the driveway to Alfred's Shott, the proposed site access and the junction with Ickleton Road. Pedestrians, cyclists and the disabled would also be at risk from the dangers here, as they would share the vehicle carriageway. (See Appendix C.)

(ii) The junction between Farm Drive and the Ickleton Road, where the footpath serving the children's play area is proposed would be hazardous to pedestrians, as vehicles coming from the E along the Ickleton Road and turning into Farm Drive often have to do so blind, from the wrong side of the road, because of parked cars. The chance of initially ending up on the wrong side of the road after turning is also high, owing to the angles involved.

(iii) Therefore, far from being a safe access which does not generate much extra traffic, the accesses are dangerous and the volume of traffic through the village and onto the wider unclassified road system would be a significant uplift (ca. 19%. See my calculations in my comments on the TS.)

Heritage

Re PS 4. 51: The applicant concludes that “the policy acknowledges that the setting to a listed building will evolve over time.” I’m not sure such a strong conclusion can be drawn from ENV2.

Re PS 4.54: it is noteworthy that the setting of a Listed Building should be given “**considerable importance and weight** when the decision-maker carries out the balancing exercise” in the Court of Appeal Judgment referred to.

Re PS 4.68: the applicant claims re the proposal that “*the low density of the site and the dominance of landscaping within the proposed scheme means that there would be little change in terms of the interpretation of the listed buildings identified above. In particular, the verdant northern edge of the main road with this mature hedge, that would be enhanced by further landscaping, would mean that for most passers-by the setting to that heritage asset would not change.*” This is misleading. The Grade II Listed thatched dwelling, “The Hoops” does not lie directly opposite the highest, thickest part of the hedge on the north side of the Ickleton Road, but opposite and close by a lower, thinner section of hedge, behind which lies the woodland where substantial thinning of mature and semi-mature trees would occur in order to provide the site access (and possibly a footpath, if 002 PROPOSED SITE PLAN is to be believed). This would necessitate removal of the whole hedge bordering the Ickleton Road at this point and further tree felling. Immediately to the east of this would lie the dwellings themselves, on high ground, towering over this low Listed Building and completely different in character there from. This would seriously change the setting of “The Hoops,” including as seen from the Ickleton Road. It would be therefore contravene LPP ENV 2, which states that “*Development affecting a listed building should be in keeping with its scale, character and surroundings.*” Also, regarding Listed Buildings, “*development proposals that adversely affect the setting....will not be permitted.*”

The NPPF paragraph 200 says, “*Any harm to, or loss of, the significance of a designated heritage asset (from ...development within its setting), should require clear and convincing justification. Substantial harm to or loss of: (a) grade II listed buildings...should be exceptional;*”

Paragraph 199 of the NPPF states that “*When considering the impact of a proposed development on the significance of a designated heritage asset, **great weight** should be given to the asset’s conservation...This is irrespective of whether any potential harm amounts to substantial harm, total loss or less than substantial harm to its significance.*” (My emphasis.) LPP 5.3 is relevant to “The Hoops”, which has a long straw thatched roof. It notes that, “*The stock of buildings with long straw thatch is big enough to be a cluster of regional architectural importance.*”

Therefore, on the grounds of damage to the setting of “The Hoops” alone, I submit that this application should be refused. The setting of the Listed Telephone Box (TCB) would be similarly affected. Grade II Listed Mulberry Cottage would be rather less affected, as it is not directly opposite the development, but the largest dwellings are proposed for the W end of the site and Mulberry Cottage is a low building on much lower ground, therefore the dwellings would be rather overbearing in the context of this Listed Building.

The NPPF point 130 states that “*Planning ...decisions should ensure that developments... are sympathetic to local character and history, including the surrounding built environment and landscape setting*”.

Re PS 4.69: I cannot see how the applicant’s inference is drawn from the reference given that “*The LPA through its other decisions appears to acknowledge that change may take place without causing specific*

harm (decision notice for UTT/22/0618/OP)” The LPA seemed completely to reject the proposal under the application to which is referred.

Re PS 4.70 – 4.72:

- (a) It is clear, taking the current application as a whole, that considerable harm would result from this development being permitted. (See “My Conclusion”.)
- (b) With regard to UDC not meeting its 5 year land supply, it is noteworthy that forthcoming revisions to the NPPF will do away with this requirement. Furthermore, I have studied the applications made to and granted by UDC since April 2022, when the last Land supply figures were calculated for the District. At that point, Uttlesford District was 78 houses short of meeting its 5 year land supply target. Since then, many applications for additional dwellings have been granted permission by the LPA. I ensured that I was not double-counting (eg. OPP and FUL for the same site) and that I took account of dwelling losses (e.g. where one existing dwelling was to be demolished and replaced by 2 new dwellings.) I only had to look from 13/02/23 to 14/11/22 to establish that UDC has granted permission for a significant number more than the requisite 78 houses, and submit that it has therefore now exceeded its 5 year land supply. The new annual calculation will not be made until April 2023.

Environment

Re PS 4.73:

- (a) The 2005 Uttlesford Local Plan states that, *“The character of the countryside changes from one area of the District to another. The particular character comes from the relationship between historic settlements and groups of buildings, ancient woodlands, historic lanes, field boundaries, historic parks, geology, indigenous tree and hedge species, river systems and so on. Different character areas have a greater or lesser capacity to accommodate development. **Open elevated areas with long views to ancient woodland, typical of parts of Uttlesford, are particularly sensitive.**”* (My highlighting.) The landscape character in and around Elmdon is exactly this type of area highly sensitive to development.
- (b) LPP ENV3 states that, *“The loss of...groups of trees and fine individual tree specimens through development proposals will not be permitted unless the need for the development outweighs their amenity value.”* Many trees in a notable group of trees would be lost as a result of this development. The LP 5.5 says that even, *“Where the principle of development is acceptable it should avoid taking away features that are prominent elements and enhance the local environment, such as for example, healthy mature trees.”*
- (c) The PEA states (Pg.11) that, *“From analysis of the proposal available at the time of writing, tree/vegetation loss would be as follows: T1, G1, G2, T2, T3, G6, T6, T7, T8, T9, T10, T11, T12, T13, T14, G11 (partial removal), T19, T34, G22 & H7”*. That is 19-20 trees: a significant loss to the environment (including the area designated on the MAGIC map as being High priority in the Woodland Priority Habitat Network (England)); to the setting of “The Hoops” and the listed TCB; and to the views of the village from the wider landscape and public footpath and bridleway network.

- (d) T9 and T34 may be considered to have low bat-roosting potential, but trees of this maturity often contain a number of important micro-environments. Certainly, as can be seen from the road, some of the trees on the site have holes, hollows and dead wood, which form an important environment for micro-fauna, small rodents, nesting birds, etc.

Re PS 4.73: hearsay would suggest that UDC does not have a very good record when it comes to enforcing planning conditions.

Re PS 4.75:

- (a) An existing access only provides for turning off Ickleton Road. It does not reach the site. The proposal is for the site to be accessed by felling trees in a protected belt of woodland. (Woodland Priority Habitat Network (England)).
- (b) There would be some hedgerow loss along the central axis of the site.
- (c) This pasture is a hunting ground for the Barn Owl, at least one of which frequents it.
- (d) Deer (Fallow and muntjac), foxes, badgers, hares, rabbits, voles, shrews and mice have all been seen at "Great Harvesters", across Farm Drive from the site. There are a number of ponds at Elmdonbury, which may host Great Crested Newts. If so, they could also be present on the site. Frogs and toads are often seen at Great Harvesters, too. A stoat was seen by the roadside not far E of the site. Red kites whirl above it, along with buzzards and kestrels. Sparrowhawks are also occasionally seen in the vicinity. At night, bats frequent the area. Many of these creatures are protected by The Wildlife and Countryside Act 1981. Some of them have amber protection status under this legislation, while others (badgers, bats, GCN's) enjoy further protection, as the PEA indicates. A badger sett on/in very close proximity of the site's proposed access road appears to be active and badgers have been seen close by it. This pastureland is therefore almost certainly utilized by many of these species, along with many smaller birds. While most of the hedgerows would be retained, the loss of this pastureland would mean loss of habitat for many of the above species, which would also be deterred by human habitation dominating this hitherto open space.
- (e) The PEA does **NOT** conclude, as the applicant here claims, that "*no ecological interest would be harmed by this proposed development.*" The PEA **actually** says that "*It is...concluded that the proposal can proceed without adverse impacts upon **legally protected/priority species and habitats provided the specific mitigatory guidance and enhancement recommendations identified within section 4.2 are fully adhered to.***" It also says that, "*The **desktop search** identified that the site is not situated within, nor bounds a statutory or nonstatutory designated location.*" The desktop search clearly missed the fact that the access would destroy part of what has been designated part of the Woodland Priority Habitat Network (England)! Therefore, its conclusion that "*proposals would not be considered likely to have any adverse impact upon statutory or non-statutory designated locations*" is erroneous. (My emphasis throughout.)

Re PS 4.74: Given my remarks regarding 4.73, the applicants' conclusion here is flawed: ecological damage at some scale would certainly result from the proposal.

Re PS 4.78 – 4.81: please see my comments (b) and (c) on the applicant’s point 4.26, plus my remarks on their point 4.73. Therefore, I do not believe that the impact on trees, or on the wider landscape from the loss of some existing trees, would be neutral.

Flood Risk and Drainage

Re PS 4.90, 4.91, 4.93:

- (a) Some of the properties along the Ickleton Road in the vicinity of the site have suffered from flooding issues in recent years. The EA Risk of Surface Water Flooding – Extent map in Appendix G to the SUDS report (pg.27) shows that a flood risk actually exists in 2 village locations close to the site.
- (b) The SUDS report for the site proposes mitigation measures regarding further runoff from the proposed development, with the idea of increasing this flood risk to others. However:
 - (i) It appears from the plan that the proposed drainage pond would be fed by only 2 pipes: one from Plot 18 and one from opposite Plot 2. This pond would itself lead to problems (danger to children, drying out in summer, causing an eyesore; breeding ground for mosquitoes). It appears unnecessary as a SUDS measure. It is hardly going to provide “*biodiversity enhancement*” (Point 5.4, SUDS report) over and above the site as it already exists! Nor would it “*contribute to enhanced amenity and aesthetic value of the development*” all year round. This may be true in some areas of the country, but not here, given the very dry summers and regularly low groundwater levels (currently at their lowest ever, I gleaned from the media the other day.) Pg.30 of the SUDS report shows only 2 surface water pipes feeding the pond. Table 5.1 shows that, while it was chosen, an “Attenuation Underground” is a possible alternative.
 - (ii) A considerable amount of maintenance is required for the proposed SUDS measures to work, some of this by the maintenance company, the rest by the owners of the individual dwellings on the proposed site. (Checking, brushing, clearing, weeding, etc., etc. See Table 6.1-6.3). In reality, this is extremely unlikely to occur. Time flies; people forget; they are busy with things higher on their own “to do” lists. Thus, particularly after a few years, flooding would be likely to be exacerbated along the Ickleton Road by the proposed development.

Re PS 4.92: it is claimed that rainwater harvesting would be incorporated into the development; however, Table 5.1 has this down as only “possible”.

Re PS 4.93: I do not accept that this would be neutral in the planning balance:

- (a) The SUBADRA element of the SUDS report says that long-term monitoring may be needed to ensure that infiltration levels recorded by their investigation are representative of long term and possible worst case conditions. With climate change and its associated extreme events occurring faster and with greater frequency than most scientists predicted, this is essential. Also, the report recommends further infiltration testing at 3m depth after (and if) the preliminary drainage designs are confirmed.
- (b) A SuDS scheme does not totally prevent additional flood risk elsewhere. The Overview of SuDS performance draft report (Oct 2009, by Ciria) points out that, “*The important aspect that therefore must be recognised is that this methodology should not be expected to provide an accurate value of the runoff rate*” for a greenfield site. Runoff will be greater than predicted for a small steep

catchment site. SuDS is only a risk **management** scheme. Perhaps this is why the applicant acknowledged in the application form that developing this site would increase the flood risk elsewhere.

- (c) SUDS report point 3.13 says that the nearest foul sewer to the site is at Elm Court. The sewer map shows the layout. (Anglian Water, not Thames Water deal with the sewage in the village, so this is puzzling.) This is a low point, topographically speaking. If 18 further dwellings were connected to this, could it not cause problems? The report acknowledges that there have already been sewer flooding incidents in the locality and says that *“flooded sewer water would likely remain in Elm Court and Ickleton Road”* (4.3, pg 8 of the SUDS report) before eventually draining away: no great consolation for the occupants of these properties!
- (d) 5.12 of the SUDS report refers to *“pollution mitigation measures.”* The site left as it is does not cause pollution. Development on this sensitive and precious chalk aquifer would cause some pollution. Moreover, this would be worsened as the SUDS infrastructure deteriorated over time and degraded from the inevitable lack of adequate maintenance by residents.

Neighbour Amenities

Re PS 4.96- 4.97: (a) The section drawing 005 is not to scale and is therefore, only the impression the applicant wishes to create.

(b) Note that no trees are proposed on 002, the proposed site plan, in the vicinity of the hedge. Even if they were, they would be unlikely to survive and/or thrive. (See my comments on 005 earlier.)

(c) While there would be some distance between the proposed dwellings and the existing properties on Ickleton Road, the height differential means that they would be overbearing.

(d) It is also very likely that the proposed dwellings on the S of the site would look into the bedrooms of the houses fronting the Ickleton Road, particularly at Elm Court. (See photo in Section 3 of this document of the existing hedge and these existing dwellings, plus what can be inferred from the Cross-Section in Appendix B.).

(e) It is therefore quite plausible that there would be a detrimental effect upon the *“reasonable occupation and enjoyment of a residential...property...as a result of loss of privacy... <and> overbearing impact”* for those opposite the site along the Ickleton Road, particularly with regard to Elm Court. This would be contrary to LPP GEN2, from which I quote.

Affordable Housing

Re PS 4.99: (a) It is widely understood in the District that the provision of 40% affordable housing is regarded as compulsory on a development of this size. Therefore the applicant is only offering what is compulsory! In fact the application itself is for 100% market housing and should be rejected on this basis.

(b) Furthermore, the Planning Inspector’s report on Great Sampford (APP/C1570/W/17/3171477) says that *“Policy H9 of the Local Plan and the Developer Contributions Guidance Document 2016 (DCGD), which has been adopted as a material consideration by the Council, seeks 40% affordable housing provision on sites of 15 or more dwellings.. ..A planning obligation has been submitted by the appellant as part of the appeal process in the form of a unilateral undertaking. This seeks to provide the required contribution of affordable*

housing. However, while the planning obligation has been signed and witnessed by the relevant parties, it has not been dated. This is a requirement in order for the planning obligation to be completed and take effect. In these circumstances, ***I cannot take the submitted planning obligation into account as part of my decision.*** This is because “with an incomplete planning obligation, there would be no provision. Thus, the development would not accord with Policy H9 of the Local Plan or the DCGD which seeks affordable housing provision.” The clearly reluctant willingness of the applicants in the Elmdon case to provide the requisite amount of 40% affordable housing here is reinforced by their suggestion of a **planning obligation** by way of a Section 106 agreement. No such agreement has been drawn up pertaining to this application. It seems to me to follow that the Planning Inspector in this case will also feel unable to take notice of the applicants’ vague offer.

Re PS 4.101:(a) LPP H11 – Affordable Housing on “Exception Sites” states that “Development of affordable housing will be permitted outside settlements on a site where housing would not normally be permitted, if it would meet **all** the following criteria:

- a) 100% of the dwellings are to be affordable and provided through a Registered Social Landlord;
- b) The development will meet a particular local need that cannot be met in any other way;
- c) The development is of a scale appropriate to the size, facilities and character of the settlement; and
- d) The site adjoins the settlement.”

Only d) above is applicable here, so the site fails this test. A Housing Needs Survey was carried out by the Rural Community Council of Essex on behalf of the Parish Council in 2016. It was done preparatory to the production of the Village Design Statement (adopted by UDC in June 2019), but received only a 17% response rate. Of these respondents, only 10 individuals filled in the section relating to affordable housing. Of these 10 individuals, the majority already owned their properties outright, while 60% were over 40, so had not such a great need of an affordable home as those in younger age brackets usually have. In itself, this is hardly suggestive that villagers in Elmdon want or need much by way of affordable housing! Since then, the majority of newcomers to the village have been either childless couples or couples with young children, so the situation cannot have significantly altered: it can therefore be concluded (as was formally done) that there is no measurable demand for affordable housing in Elmdon.

(b)With regard to rural housing in general, the NPPF (point 78) states that: “*planning policies and decisions should be responsive to local circumstances and support housing developments that reflect local needs.*” This housing is not needed or wanted in Elmdon: a Parish Council meeting to discuss the development proposal was held on 2nd March 2023. Inhabitants of the Parish were encouraged to come to the meeting for an open discussion on the proposed development after the Parish Council had discussed it and formed its view. The meeting was held in the church, as a high turnout was anticipated and the village hall could have been (and was) too small to accommodate this unusually large gathering. At the end of the evening, a show of hands was taken, both for and against the development proposal: almost everyone there voted against the proposal. As far as I and others present could tell, only one person voted in favour.

(c) As was expressed at the meeting, very few parishioners present would be opposed to the provision of genuinely affordable housing in Elmdon, **if really needed by the local community**; however, in that event, it should be provided **on an appropriate site**. (I can think of several such.) The site forming the subject of this application is entirely **inappropriate** for ANY development - including affordable housing: it would destroy the landscape character; ruin the character of the village and the setting of Listed Buildings; eat into

protected woodland; threaten protected wildlife species; and consume good agricultural land. Since the war in Ukraine, it is becoming increasingly apparent that the latter should be cherished and reserved in case it is needed for future food production.

(d) The NPPF Point 79 says that *“To promote **sustainable** development in rural areas, housing should be located where it will **enhance or maintain** the vitality of rural communities. Planning policies should identify opportunities for villages to grow and thrive, especially where this will support local services.”* The proposed development would be detrimental to Elmdon. There are no local services for it to support in the village. The proposal is therefore contrary to the NPPF.

Best and most versatile agricultural land

Re PS 4.102:

(a) There is a lot of Grade 3 (Good to Moderate) land in the village, but it is mainly on the S side of the Ickleton Road. The site which forms the subject of this proposal is Grade 2 (Very good). Point 5.9 of the LP says, *“Such land should be avoided for development unless sustainability considerations suggest otherwise.”*

(b) LPP ENV 5 states that *“Development of the best and most versatile agricultural land will only be permitted where opportunities have been assessed for accommodating development on previously developed sites or within existing development limits. Where development of agricultural land is required, developers should seek to use areas of poorer quality except where other sustainability considerations suggest otherwise.”* There are no other sustainability considerations in favour of development on this site. There is a fair amount of less good land around the village.

(c) Point 5.10 of the LPP affirms *“pasture land is important to the character and biodiversity of the district.”* Although easily capable of food production, most of the site is currently used for pony pasture and contributes to the landscape quality as such. It is certainly important for biodiversity, as discussed earlier.

Re PS 4.103: it has been demonstrated that there is no pressing need for development within Elmdon. There are possible sites for development within the village and in close proximity thereto which would be suitable for development without taking any Grade 2 land. These sites have not been proposed for development at this moment in time, but time is not of the essence here, given the current lack of demand for affordable housing in the village, therefore it is not necessary to develop the proposed site.

Re PS 4.104: The applicants argue that, in the context of the overall countryside, this is a small site *“In terms of its economic contribution”*.

(a) That argument could be applied to many sites on such a wide basis, so is meaningless!

(b) It has been proposed from time to time that an economic value should be attributed to the environment. Surely, each site should be valued for its overall contribution to its own particular locality, taking into account environmental factors? Much has already been said by me about the environmental contribution of this site. However, there is another factor: this particular site, as the SUDS report shows, is on chalk. It forms part of the chalk aquifer supplying a large population with water through boreholes and watercourses. The aquifer has been dreadfully depleted and is at an historical low due to ever-increasing demand for water and the effects of climate change in the driest county in the country. Essex receives an average of 263 mm

(10.5in) of precipitation per annum. [Climate & Weather Averages in Essex, England, United Kingdom \(timeanddate.com\)](https://www.timeanddate.com) East Anglia as a whole receives 626mm of rain per year: ca. half the U.K. average. Affinity Water, which manages the water resources in this region, has a draft Water Resources Management Plan 2024.

[52e25a3b0555c5d43114dde844fba378 A summary of our draft Water Resources Management Plan 2024.pdf \(amazonaws.com\)](https://www.amazonaws.com) The site of the proposed development is in the Stort sub-area of Affinity Water. The watercourses on chalk are fragile and rare habitats. Affinity Water says (pg. 4), *“We operate in a supply area which is uniquely home to 10% of all globally rare chalk streams. Although we have sufficient water to serve our customers now, we cannot continue to abstract water from boreholes near these rare habitats in the longer term. We need to reduce abstraction from our chalk groundwater sources.”* Development on the chalk aquifer is damaging to water resources and to wildlife: as less water flows in the chalk rivers and streams, so the wildlife is depleted and at risk of being lost from this rare habitat. The draft says, *“chalk streams....are extremely rare – most of the world’s are here in England. They are ecologically vital, supporting a rich biodiversity: trout, voles, otters, kingfishers. And they are under threat, because their aquifers currently provide drinking water for millions in South East England, and that is unsustainable in the long term.”* There are only 225 chalk streams on the planet (including rivers in this total.) Most (85%) are in the south and south-east of England, making these locally even rarer. We **cannot** keep building on the chalk aquifer, placing more and more pressures upon it, upon the wildlife which depends on it and upon the tourism which enjoys these rare rivers and streams. (The river Cam which runs through Cambridge is a chalk river, fed by chalk streams from this area. [Messing about with the river: water firms accused of draining the Cam dry | Rivers | The Guardian](https://www.theguardian.com)) We have a **global** responsibility to cherish and care for these rare habitats.

(c) The applicants suggest that a swap of this site for another site on Grade 2 greenfield land elsewhere would be immaterial. (b) above shows that that is not necessarily so. The site sits on part of the Cam and Ely Ouse Chalk Water Body. By no means all the District lies on chalk aquifers. [Cam and Ely Ouse Chalk | Catchment Data Explorer | Catchment Data Explorer](https://www.catchmentdataexplorer.com) The map in the link shows that areas in the south of the District are not on a chalk aquifer. Also this site has many distinctive attributes, as said earlier.

(d) The applicants also assert that there is little flexibility in terms of the location of new development without using high grade agricultural land. That is untrue: there is brownfield land elsewhere in the district, and even some just outside the village, at Freewood Farm, although not all brownfield land will be immediately put forward for re-development, of course. Then there are the poorer grades of agricultural land, notably Grade 3 in the District.

Re PS 4.105: I therefore hope to have demonstrated that the proposal is definitely contrary to LPP ENV5 and to the objectives of paragraph 174 of the NPPF.

Community Facilities

Re PS 4.106 & 4.107 The proposed “communal open space” is not required by the village. We have a large open space at the cricket ground, where benches are provided to sit and enjoy the area. Many of the dwellings in the village have gardens large enough to accommodate sizeable play equipment such as swings or trampolines. Most of the children from the village of an age to enjoy a play area with fixed infrastructure such as that suggested by the applicants will go to Chrishall Pre-School or Primary School, where there is already a well-equipped playground. The playground and communal space are simply not needed. My husband built an excellent swing for the children in our Ukrainian refugee family, but the youngest (of primary school age) hardly used it; her elder siblings, even less. The maintenance of such a play area and

communal green space would increase the cost of the proposed management fee for the development. There would also need to be public liability insurance. The pond would be a risk when it contained water and an eyesore in the hotter and drier months, when it would dry out. The provision of any footpath to it and its surrounding green area is not included in the proposals. The footpath to the children's play area is unsafe in the vicinity of the Ickleton Road and Farm Drive. (See my earlier remarks.) No footpath to it from the new housing is proposed. The play area itself is proposed for the highest part of the site, so would be intrusive in the landscape. So these provisions are not a positive in the planning balance, after all.

The Planning Balance

Re PS 4.108: (a) the key issue is whether or not the proposal would constitute "sustainable development". The NPPF states in point 8 that there are 3 strands to this:

- *"an economic objective – to help build a strong, responsive and competitive economy, by ensuring that sufficient land of the right types is available in the right places and at the right time to support growth, innovation and improved productivity; and by identifying and coordinating the provision of infrastructure*
- *a social objective – to support strong, vibrant and healthy communities, by ensuring that a sufficient number and range of homes can be provided to meet the needs of present and future generations; and by fostering well-designed beautiful and safe places, with accessible services and open spaces that reflect current and future needs and support communities' health, social and cultural well-being; and*
- *an environmental objective – to protect and enhance our natural, built and historic environment; including making effective use of land, improving biodiversity, using natural resources prudently, minimising waste and pollution, and mitigating and adapting to climate change, including moving to a low carbon economy."*

These should be considered in a mutually interdependent way "so that opportunities can be taken to secure net gains across each of the different objectives."

(b) In my conclusion, I hope to draw together threads from my comments on the applicants' submission and demonstrate to the Inspectors' satisfaction that this proposal clearly does NOT constitute sustainable development and that it is contrary to the NPPF and LPP's.

Re PS 4.109 – 4.115:

- (a) The latest figures for UDC's 5 year housing supply were given to me by one of my local District Councillors on 2nd March 2023. Uttlesford District has a 4.89 years' supply of housing and expects to attain a 5.5 years' supply by the autumn. Does the current shortfall mean that UDC should therefore grant permission for every housing application made to it? No! It only grants permission to applications for **sustainable** development. The Planning Inspectorate surely does similarly, so that it adheres to the NPPF.
- (b) The upcoming amendments to the NPPF indicate that pressure to build will soon be taken off rural areas and transferred to cities. They were apparently expected to come into force this spring, but it is now supposed to be taking a while longer. It is submitted that planning decisions should be forward-looking and accord with the changes expected to come into force very shortly.
 - (i) One of these changes removes the necessity for Districts to have a 5 year land supply at all times, subject to certain conditions.

- (ii) Another change places more weight on the attitude of the local community to a development proposal. At a Parish Council Meeting in the village on the evening of 02/03/23, which was very well attended, due to the current planning proposal being on the agenda, a total of 76 parishioners (most from Elmdon), plus councillors, attended. At the end, there was an open, well-ordered discussion, followed by a show of hands as to who supported and who opposed this proposed development: there was one supporter. A sea of hands voted in opposition.
- (iii) The Village Design Statement (adopted by UDC in June 2019) [Elmdon-VDS-hires compressed.pdf \(uttlesford.gov.uk\)](#) was compiled after thorough consultation with the whole Parish. On pg. 18, it lists, among its **Guidelines for the Landscape** that they should:

“• *Conserve the rural character of the area.*

• *Conserve the narrow winding lanes*

• *Ensure that any new development **responds to historic settlement pattern**, especially **scale and density**, and ...such development should be **well integrated with the surrounding landscape.**” (My emphasis.) This proposal runs contrary to the first and third and would damage the second.*

The VDS **Guidelines for housing** (p. 24), including the following, “*produced as a summary of the responses to the residents’ questionnaire October 2017*

. • *Maintain the low-density character of the villages and **favour small 2 or 3 bed family homes.***

• *Future **development of more than one dwelling** should prioritise previously developed sites and **not be on new greenfield sites.***

• *Development of redundant rural buildings is supported.*

• *Development should be **sympathetic to the rural nature of the villages.***

• ***New dwellings should not impact on the views of the countryside from the rear or between dwellings***

• *New development should seek to avoid **harm to historic buildings and their setting**”. (My emphasis.)*

The VDS **Guidelines for the environment**, (pg. 28) “*produced as a summary of the responses to the residents’ questionnaire October 2017*” are thus:

• ***Protect the open landscape and landscape views around the villages.***

• ***Conserve the character and appearance of the conservation area in Elmdon and the open spaces in Elmdon and Duddenhoe End.***

- ***The rural nature of the villages should be kept by protecting, retaining and maintaining green spaces, ditches, verges, footpaths, bridleways, mature woodland areas and native hedgerows.*** (My emphasis.)

Much has been said on most of these points. I should add that the new development would be visible between houses on the Ickleton Road from Horseshoe Close. I am sure the Inspector can see how this application would have **no respect whatsoever** for the wishes of the villagers and/or the adopted VDS, nor for the forthcoming changes to the NPPF.

Re PS 4.116: (a) The harm this proposed development would do would be to devastate this beautiful, small, characterful, historic village with its narrow lanes and feeling of being “off the beaten track.” This is precisely why most of us who live here have chosen to do so. As one of the UDC Planning Committee said at their Meeting on 08/03/23, “Elmdon is a pretty special place, a beautiful village.” Once that is lost, it would be lost forever. While this proposal is the only one which the Inspector can consider, I respectfully request that he/she takes into account that once a precedent for development on greenfield land outside the village development limits has been set, the floodgates would open in regard to further such development in Elmdon. Please note that one of the parties behind the current application is a developer who owns hundreds of acres of land in the village, much of it with road frontage/access. I submit that great weight should be attached, both to the harm resulting directly from the proposed development and to the indirect harm, as just indicated.

(b) Never has a development in this village been so huge in relation to the existing village as the one proposed, which is a third larger than anything before; never has a development been proposed for the village which would almost obscure a whole hillside – a hillside which is open countryside, outside development limits. The landscape’s character would be lost. The Elmdon Chalk Uplands is only a small area, extending from the village of Chrishall in the west south and east to the nearest edge of Littlebury village, incorporating the hamlets of Pond Street and Bridge Green, but stopping short of Duddenhoe End. It is unique, beautiful and precious. That loss of landscape character, with its currently tranquil and open feel, would be evident from public footpaths and bridleways around the village, most notably from the Icknield Way. From the Scheduled Ancient Monument of the Mill Mound on the Icknield way, the proposed development would also affect the views of the Grade II* Listed village church and the Grade II listed Elmdonbury barns and former stables complex, rivalling both of these for attention in one’s view. (See photo by my comment on PS 4.19 (a)). What can be seen of the Conservation Area would also pale into insignificance besides the large modern intrusion into the landscape. Many walk this way, not only villagers, but also those who bring their dogs and or horses here to enjoy the countryside, plus those walking the Icknield Way.

(c) Many further harms would result from this development, as already discussed and summarised in “My Conclusion”, later.

(d) This amounts to a great deal of significant damage. It is surely enough to count greatly – all the more so when set against the gain of 18 dwelling units (many of unwanted size) in a village far from the major settlements and with no public transport, shop, pub, school or other services? Moreover, there has been quite a lot of development in the village since the VDS was produced: piecemeal development consisting of the conversion of redundant agricultural buildings and occasional infill. Elmdon is not a static, dying community, but a vibrant, changing one. We just want the changes to be in keeping with what we treasure and what we need.

(d) As previously noted, Uttlesford is now in a much better position with regard to its 5 year land supply. As of April 2022, it stands at 4.89 years, but is expected to reach, or even to exceed its 5 year land supply this coming April (2023).

Re PS 4.117 – 4.125: (a) Henham:

- Is a **much larger village** than Elmdon. In 2011, the population of Henham was 1,233. Elmdon's was ca. 350 (even the whole parish, including Duddenhoe End and the tiny hamlets of Upper and Lower Pond Street and Bridge Green) was only 611.
- Has **many local services**, including a shop with post office, other shops (bedding, jewellery, tyres and farm shop), an industrial estate, a beauty salon, a pub, a primary school (only 10 minutes' walk from the site in question), a church, several community halls (one with a library), a tennis club, a fitness studio, a plant hire firm, a solicitor, a travel agent, a counselling and hypnotherapy service, and a leather works. (Source: Google maps and the Henham village website.) Consequently, **there are a number of employment opportunities within Henham**. Elmdon has only a church, a small village hall and a cricket field.
- Has a **regular bus service** stopping almost outside the site (as well as other locations within Henham), taking residents to the nearby large village of Elsenham (which has a railway station on the main line to London and Cambridge), Stansted Mountfitchet (also having a railway station on the same line), Bishop's Stortford (an excellent mainline train service) and Stansted airport (also with a frequent train service into London.) Elmdon only has a school bus.
- Henham is 1.7 miles from Elsenham, which also has a primary school, a doctors' surgery and a further shop (furniture) and services (taxi, chauffeur) and a good range of sporting facilities. Between Henham and Elsenham lies a golf course. The nearest primary school to Elmdon is over 2 miles from the application site. The nearest doctors' surgery is in Great Chesterford, over 4 miles away.
- Stansted Mountfitchet is a small town 3.6 miles from the site at Henham. It has numerous shopping facilities (including a Tesco supermarket), pubs, a restaurant and a leisure centre. Elmdon is much further from a town. (Saffron Walden is ca. 6 miles away from Elmdon.)
- Bishop's Stortford is a much larger town, ca 1 mile further from the site at Henham than Saffron Walden is from the site at Elmdon. The most notable difference in this context is that it is reachable from Henham by a regular bus service and from nearby Elsenham by a regular train service; Elmdon has no regular bus service to Saffron Walden and has no train service thereto, being ca. 5 miles from a railway station. (Indeed, Saffron Walden itself is nearly 3 miles from a railway station.)
- There is an (airport-related) hotel less than 2.5 miles from the site at Henham, providing employment opportunities for those from that village.
- Henham lies on the Broxted Farmland Plateau; Elmdon on the Elmdon Chalk Uplands. A glance at any Ordnance Survey map of the two areas clearly shows that the countryside round Elmdon is considerably more undulating and better wooded than near the Henham site: I therefore think the Elmdon countryside is rather more attractive than that round Henham, and thus more worthy of preservation for its own sake. (LPP S7)

- The Henham site involved no woodland loss.
- Protected lanes are much further from the Henham site and not in what would be the predominant direction of travel there from.
- The Henham site looks as if it is on Grade 3 land; Elmdon's is on the better Grade 2.
- The Henham site is further from that village's Conservation Area than the Elmdon site from Elmdon's. At Henham, there are a considerable number of intervening buildings. No Listed Buildings are adjacent or particularly close to the site.
- There appear to be no access dangers at the Henham site; the Elmdon site has a very dangerous access proposed.
- Looking at the site in relation to Stansted Airport would suggest that much aircraft noise is experienced by those living in Henham. Elmdon is relatively quiet with regard to this. Any additional traffic noise from the proposed development would therefore be much more significant in the context of Elmdon. The BKY flight path goes close to Henham, which is much closer to the airport than Elmdon and Elmdon is not on a flight path for Stansted. [ERCD Report 2003 - Noise Exposure Contours for Stansted Airport 2019 \(live-webadmin-media.s3.amazonaws.com\)](https://www.amazonaws.com/live-webadmin-media.s3.amazonaws.com/ERCD-Report-2003-Noise-Exposure-Contours-for-Stansted-Airport-2019) (Appendix B, Fig. B3, B7, B8.) B11 also shows the cluster of population in Henham and its proximity to nearby population centres (Elsenham, Stansted Mountfitchet, Bishop's Stortford, while B12, B14, B15 & B17 show Henham site's closeness to the B54 LEQ noise contour by day and B13 & B16 its night time proximity to the 48 LEQ contour. B19, B20, B21 & B22 show the site's nearness to the 50 and 20LEQ contour by day.)

In conclusion, the proximity of the Elmdon site to historical features and to the Icknield Way makes this site more sensitive to development than the Henham one, even though that was also visible from a number of public footpaths. The Landscape Character Area within which Henham lies is larger than the H1 of Elmdon; moreover, Elmdon exemplifies the Character Area. No destruction of woodland – much less protected woodland – needed to occur at the Henham site and possibly no loss of Grade 2 agricultural land. The tilted balance would presumably be very different for a site with so many more facilities and employment opportunities close by – both in the village itself and in settlements in close proximity, to which cycling is an option. The bus service and proximity to mainline train services means that Henham is much less remote than Elmdon, as does Henham's closeness to Stansted Mountfitchet. Even if people decide to travel by car, they can reach a large range of services and employment within a much shorter distance than if travelling by car from Elmdon. There are road safety dangers at the proposed Elmdon site, which are absent at the site in Henham. The Elmdon site is much more sensitive to increased noise due to traffic from the proposed development than is the Henham one. I submit that Henham is therefore a much more sustainable village than Elmdon and the site less sensitive to development than Elmdon's.

Re PS 4.119, specifically: this refers to the 5 year land supply deficit in Uttlesford. This is now less marked than when the Henham case was decided: it was 3.11 in November 2021; it is 4.89 now and expected to reach or exceed 5 years next month. Moreover, the forthcoming changes to the NPPF mean that there will be greater emphasis on the protection of farmland.

Re PS 4.121, specifically: The Planning Statement makes passing reference to Great Sampford, but provides no Application or Appeal reference: perhaps it means the **dismissed** Appeal (2017), also for 18 houses. (APP/C1570/W/17/3171477, ref: 17/00029/REF) Great Sampford has a primary school, a pub, two churches and a village hall (much larger than Elmdon's). It also has a cricket ground, a tennis club and a couple of taxi businesses. (Google maps and the Village website.) It had no regular bus service, save a school bus (term-time only), just as Elmdon . The Inspector remarked in his decision statement that, *"As a consequence, occupiers of the proposed development would need to travel beyond the village to access most other services and facilities. Nearby settlements that offer a greater range of services and facilities are beyond a reasonable walking or cycling distance along roads that contain national speed limits and lack pavements or lighting."* (pt. 13 of the Decision Notice) Again, this is just as Elmdon, and that, *"14. As such, there is likely to be a reliance on the private motor car for occupiers of the development. The NPPF highlights that transport solutions will vary from urban to rural areas. **However, a development of 18 dwellings is likely to generate a significant amount of transport movements per day and a large number of these movements are likely to be by private car.** Thus, there would be significant negative effects in terms of the use of natural resources and the lack of accessible local services. It would also conflict with the aim of the NPPF to promote sustainable transport modes."* (My emphasis). The Inspector further remarked (point 28.) that, *"the negative environmental effect of the development on the character and appearance of the area would be significant due to the level of encroachment and intrusion of built development into the countryside. The lack of accessible services and facilities and the subsequent reliance on the private motor car would have significant negative environmental and social effects. The noise and disturbance caused by a number of vehicle movements per day along the...road is important. All these factors are as per Elmdon. "The Inspector continues, "16. Concluding on this main issue, the proposed development would not be a suitable location for housing having regard to the accessibility of services and facilities. Therefore, it would not accord with Policy GEN1 of the Local Plan."*

The Inspector for Great Sampford noted (Point 26 of his decision notice) that *"Being out of date does not mean that a policy carries no weight. Policy S7 takes a more restrictive approach to development in the countryside compared to the NPPFHowever, it is broadly consistent with the NPPF in terms of seeking to protect the character and appearance of the countryside and so still carries reasonable weight. Policies GEN1, GEN4 and H9 are consistent with the NPPF and so carry substantial weight."*

The Inspector for the Great Sampford Appeal considered that *"the effect of the development on the living conditions of occupiers of neighbouring properties with particular regard to noise and disturbance"* was one of the main issues for this Appeal. The impact of the extra vehicle moments which would have resulted from the Great Sampford development upon its neighbours would have been similar to that which would result from the current application for Elmdon, especially upon those living along the Ickleton Road. This would be even more intrusive at Elmdon, as Great Sampford lies on a B road, which is likely already to carry far more traffic than the unclassified roads through Elmdon. Furthermore, the noise and dust from construction traffic, plus the consequent congestion and conflict with large farm vehicles, etc., do not bear thinking about!

The **dismissal** by the Planning Inspectorate of the Great Sampford Appeal was in August 2017, when UDC's 5-year housing supply was in a worse state than it is today. (4.5 years then – point 25 of the Inspector's Decision Notice.) As of April 2022, it is 4.89 years. According to one of our local Councillors, the situation is expected to have further improved by April 2023, when it is quite possible that UDC will have completely

fulfilled its 5-year housing supply. I humbly suggest that this is all the more reason why the Elmdon application should be likewise refused now.

Re PS 4.123: this refers to net gains in biodiversity at the Henham and Great Sampford sites. No net gain in biodiversity is claimed for the Elmdon site. I infer that this is because there would be a net **loss** of biodiversity if the Elmdon site were developed, due to the loss of woodland, hedgerow and pasture.

Re PS 4.125 - 4.128: It is conceded by the applicants that each case is to be judged on its merits (PS 4.127). I submit that is clear from what has been said above that the proposed development at Elmdon has only the merit of bringing forward housing and that the applicant is seeking 100% market housing. Even if the 40% affordable housing were to be accepted for this site, I submit that the significant and wide-ranging harms outlined in my former comments demonstrate that the “tilted balance” is strongly AGAINST granting permission for a housing development on this site in Elmdon.

Re: the **Applicants’ Conclusion** (PS5.1 – 5.3) I hope I have demonstrated to the satisfaction of the Planning Inspector that the proposed development for this site in Elmdon is anything BUT sustainable, and that permission for development on this site should therefore be REFUSED.

6. Comments re: the Transport Statement (TS)

Re TS 2.5 Section 9 of the NPPF on Promoting Sustainable Transport states in paragraphs 104 and 105:

- (i) *“Transport issues should be considered from the earliest stages of plan-making and development proposals, so that: c) opportunities to promote walking, cycling and public transport use are identified and pursued; d) the environmental impacts of traffic and transport infrastructure can be identified, assessed and taken into account”*– they have not been here. (See my comments in my section 2 on 002, the Proposed Site Plan.) There is no provision of a separate footpath or cycleway to the dwellings. The footpath proposed to serve the children’s play area has an unsafe access.
- (ii) *“Significant development should be focused on locations which are or can be made sustainable, through limiting the need to travel.”* Elmdon is not and cannot be made sustainable. It is too far from regularly-needed facilities.

Re TS 2.8: (a) Paragraphs 110 and 111 of the NPPF state: *“In assessing sites that may be allocated for development in plans, or specific applications for development, it should be ensured that:*

a) Appropriate opportunities to promote sustainable transport modes can be – or have been – taken up, given the type of development and its location;” (There are none here.)

b) Safe and suitable access to the site can be achieved for all users; (The site accesses are dangerous for all users.)

c) The design of streets.... reflects current national guidance, including the National Design Guide and the National Model Design Code; (They are not in accord with the Essex Design Guide, which presumably is in harmony with national guidance.)

d) Any significant impacts from the development on the transport network (in terms of capacity and congestion), or on highway safety, can be cost effectively mitigated to an acceptable degree. There would be significant impacts on the village road network. (These could not be mitigated without great expense and damage to the environment: ripping out a long-established hedge and altering earth levels immediately adjacent to the site; plus demolishing dwellings in the Conservation Area, nearer to the heart of the village.)

(b) Re The NPPF 111: *“Development should only be prevented or refused on highways grounds if there would be an unacceptable impact on highway safety, or the residual cumulative impacts on the road network would be severe.”* There **would** be an unacceptable impact on highway safety, in my humble opinion:

(i) As already indicated, I was at an Uttlesford District Council Planning Committee Meeting on 08/03/23 to listen to the presentation of this case and the debate as to how UDC wished to respond to PINS as a consultee: the Councillors did not seem to have spotted a hidden danger in the applicants’ submission. (As a member of the public, I was unable to speak at the meeting because the application has been made direct to PINS.) Fortunately, it was decided that UDC will anyway be objecting to the proposed development in their submission to PINS.

(ii)The applicants have submitted an existing site plan (document 001), but left a key feature off the **proposed** site plan, namely the private driveway to Alfreds Shott, the property visible in the small scale inset to document 001. Notably, this driveway has been left off all the other documentation, save for the Open Spaces Tree Protection Plan (optimistically named, since the proposal involves the felling of trees!) where it is not noticeable due to the tree information. The existing dwelling is also left off this Tree Protection Plan.

(iii) To me, the situation seems intuitively dangerous, but studying the Essex Design Guide confirmed to me that it would be, should the proposed development be permitted. The Ickleton Road is classed as a Local Distributor in the EDG 2018 Edition V.1 (Class A in the EDG junction spacing table, Pg. 155). The proposed site access, would be a Minor Access Road (F), as would the existing road almost opposite it, Hollow Road. The drive to Alfreds Shott is classed as a Private Drive (H) in that table. While the situation shown in the EDG diagram is not exactly replicated on the ground, it is the nearest I can find. Underneath the junction diagram on that page, it says, *“Side roads joining type A or B roads should have no side junctions to other roads within 20m of the junction with the major road.”* (See photo below and Appendix C.)



(iv) What it is **almost impossible** to appreciate from the plans is that the Alfreds Shott driveway joins the proposed access road only ca. 9.66m from the junction of the latter with the Ickleton Road (excluding vision splay, so less if that is taken into account!) This is clearly far less than the above mentioned 20m! Also, the relative layout of the roads in this situation seems to me to make matters even more hazardous! (See photo below and Appendix C. The white junction lines on egress from Hollow Road are just visible in the bottom of the photo.)



(v) The distance recommended in the EDG between junctions on the opposite side of a road (here, the proposed site entrance and Hollow Road) is 50m. The actual distance on the ground is currently ca. 7.35m, excluding vision splays and the proposed site road widening, which would then make Hollow Road slightly overlap with the proposed site road. Also, the (private) school bus picks up pupils for Chrishall Primary School from just opposite the proposed site access.

(vi) Ickleton Road is only fractionally over 5m wide at the junction with the proposed access (5.02m). Parked cars frequently line this road, so that drivers heading west usually have to travel on the wrong side of the road. Large farm vehicles often use the road. Indeed, a combine harvester scraped a car parked on the road and took the wing mirror of another parked in a parking bay opposite the first car a couple of summers ago! Even cars are getting bigger nowadays. It is narrower than 6m in a number of places.

(vii) The edge of the Ickleton Road on one side has no kerb, and is prone to potholes forming and eroding the carriageway width even further. (We have one such right now.) How would the village roads cope with an estimated 36+ more vehicles being used by residents of the proposed development, plus all the extra delivery and service vehicles? The notion of how large construction vehicles could reasonably develop this site without causing major problems within the village defies the imagination!

(viii) Alfreds Shott is the first property on the right after one enters the village on the Quickset Road/Ickleton Road. The latter is an extension of Quickset Road, which is 60mph National speed limit until the 30mph "gateway" to Elmdon. The first homes on the left are those on Hollow Road. A lot of vehicles are still speeding as they enter the village on this route. (See TS 4.4)

(ix) Alfreds Shott is just round a bend in the road from both directions. Visibility on exiting Alfreds Shott onto the Ickleton Road on what would become the site access, is therefore somewhat limited. The applicants' Transport Statement concedes **that there have been a number of near misses**, both from the egress of that one property and from Hollow Road. (Section 4.4) An accident there, should the site be developed, looks just a matter of time. (In the first photo below, the entrance to Alfred's Shott is just round the bend, beyond the traffic cone. The houses beyond the parked cars are in Hollow Road. In the second photo below, the bend in the Ickleton Road is shown from near the entrance to Alfred's Shott, with the junction shown being that of Ickleton Road with Hollow Road.)





(x) Furthermore, the proposed access road would be just opposite where the private minibus service to Chrishall Primary School stops. (This privately run bus to Chrishall Primary school exists partly because of the distance between the two villages and partly because there is no footpath or cycleway along the Heydon and Hertford Lanes (The former becomes the latter.)

(xi) The additional traffic would add ca. 19%+ to the volume daily going through the village on narrow roads, where many residents and visitors have to park. Apart from the added disturbance to residents, it would further add to the dangers at the Quickset Road/Royston Lane hazard.

(xii) Traffic already has to weave and dodge between parked vehicles on the narrow Ickleton Road. Large vehicles which have to stop for a while (dustcart, oil tankers, delivery lorries) sometimes block the carriageway here due to parked cars. Queues often build up behind these temporarily stopped vehicles. This problem would be exacerbated by any sizeable development in or near the village, such as the proposed 18 houses.



(xiii) This extra traffic would make the narrow Heydon Lane even more dangerous for pedestrians and cyclists. There is no footpath, so walkers have to use the vehicle carriageway to access footpaths in the vicinity of Park Wood from Heydon Lane.

(xiv) The extra traffic would also make Essex Hill more dangerous, as it lacks a pavement towards the turn off to Freewood Farm. These two roads, together with the bridleway/footpath through Freewood Farm form part of the Icknield Way. This is regularly used, not only by parishioners, but also by walking parties and individuals from outside the village who come here either to walk in the beautiful countryside surrounding Elmdon and/or to walk the long distance historic footpath of the Icknield Way. It would also make the Ickleton Road more dangerous, as the pavement is very narrow in places and is at one point almost blocked by a telegraph pole, so any parent with a pram has to walk in the road at that point.

(xv) According to the TS 4.2, the proposed access road would be 6m wide at the junction with the Ickleton Road, making it considerably wider than the latter Local Distributor at that point (5.02m). Could this potentially lead to confusion for motorists unfamiliar with the area?

(xvi) The applicants have made it look as if a wide footpath exists already, almost to the proposed dwelling site. It does not and has not during the time I have known the village i.e. since 1987 (See maps 001 and 002 of the application). There is no proposal to construct such a footpath. This area is blocked from the road by a hawthorn hedge. The ground in the woodland is rough. Pedestrians and cyclists would have to use the carriageway of the proposed access road to get to the dwellings and/or the green space near the drainage pond, which the applicants plan to make public space. No separate provision has been made for either pedestrians or cyclists. Given the junction dangers, this would seem particularly hazardous.

Safety for all users has clearly NOT been addressed by the applicants. This is counter to LPP GEN 1.

Re TS 2.19: Essex Transport Strategy (ETS): Policy 2 states that, “ *Integrated Planning Transport and land-use planning will be used together to **secure new development at the most appropriate and sustainable locations** by: working closely with district planning authorities to enable a better balance of new homes, jobs and services; **locating new developments in areas which are accessible to key services by sustainable forms of transport; ensuring new developments provide for sustainable transport and effective travel planning;**” (My emphasis.) This is in line with the Essex Local Transport Plan 2011 (ELTP). This proposed development is counter to Policy 2 of the ETS and of the ELTP since no bus (save school transport) or train service exists in the village and it is remote from key services. The site is not sustainable.*

Re TS 2.2: Policy 9 of the Essex Local Transport Plan 2011 (ELTP) states that “*the Council will support and promote sustainable travel, require **travel planning for proposed developments** and promote access by sustainable means to railway stations and airports.*” No travel plan has been forthcoming.

Re TS 2.22: Please note ELTP Policy 10 on the safety of road users and pedestrians, I trust I have fully drawn the Inspector’s attention to the dangers of this site.

Re TS 2.23: I have addressed above the defects of this application with regard to pedestrians and cyclists.

Re TS 2.27: Development Management Policies (2011) DM1 is quoted. Regarding “vi. *all proposals <must> have safe and convenient access for sustainable transport modes commensurate to its location;* and “vii. *proposals will not create a significant potential risk or be detrimental to the safety of the highway network*”. This site does not measure up to either requirement

Indeed, Regulation 19 of the Local Plan 2011 [Regulation 19 Local Plan \(uttlesford.gov.uk\)](http://uttlesford.gov.uk) Refers to Essex County Council Highways Development Management Policies. Policy TA1 on Accessible Development states that “*Development proposals will be located in close proximity to services and make use of sustainable forms of travel (walking, cycling and public transport) to fulfil day to day travel needs **as a first requirement.***” (My emphasis.) Policy TA2 here says, “*Sustainable modes of transport should be facilitated through new developments to promote accessibility and integration into the wider community and existing networks. Priority should be given to cycle and pedestrian movements and access to public transport.*” No such in this application.

Re TS 2.28: The access is dangerous, as noted.

Re T.S. 2.30.2.31: Nothing sustainable in this application.

Re TS3.3: Great Chesterford is just under 7Km away from the site. The applicant has not applied correct rounding. There is no pub or childminder and no signed bus stops (because there is only a school bus service.)

Re the TS on Buses

Re TS 3.4:

- (a) The only bus which can realistically be accessed by Elmdon residents is the 444 Term-time only bus to the local secondary schools. It leaves and drops off from the bottom of King's Lane, over 0.5 miles from the site, **not** from Ickleton Road. The hours are tailored to the pupils' school day. It is questionable whether a member of the public other than school children would get a seat on this bus. Saffron Walden County High School is a mile from the centre of this town, so why would they want to? Teachers need to be at the schools earlier and often leave later. Newport is a village, albeit a large one. No- one is going to take a school bus there for any other reason than the school, as there are vastly better facilities in Saffron Walden, which is slightly closer to Elmdon.
- (b) Why would one go to Chrishall for the 444, when it runs through Elmdon? Chrishall is a 48 minute walk by road from Elmdon, or 14 minutes by bicycle. It is 2.2 miles away. There is nowhere to leave a bicycle. There is no footpath along the Heydon /Hertford Lane. A private school bus takes some of the children from Elmdon to Chrishall Primary school because it is not safe to walk along the road and the footpaths are often too muddy. They would also be unsafe in the dark. They are not an option for schoolchildren or commuters.
- (c) Coploe Road is in Ickleton, not Elmdon. It is 2.8 miles away by the shortest route on Google maps: 14 minutes by bike, but the bus stop there has no bicycle storage; 54 minutes on foot (again, no footpaths on these lanes.) The steep hill between Elmdon and Ickleton is untreated in the winter, as is the Quickset Road. The hill is impassable after any meaningful snowfall and hazardous in icy conditions, even for a car. The route crosses a county boundary, so this lack of gritting on these unclassified roads is unlikely to change.

Re TS 3.5: the 444 school bus does NOT provide any useful access to Barley, Heydon or Chrishall: from Elmdon, it only goes to these villages on the late afternoon return journey, so one would be stuck there overnight! It is a term-time only bus. [SESX 444.pdf \(essexbus.info\)](#)

Re T.S 3.6 The 31 bus to Cambridge is once a day from/to Chrishall. See my point (b) re TS 3.4 above, except there is limited cycle storage; however, it belongs to the primary school and is not for public use, so there essentially isn't any. The bus is run by A2B and leaves at 07:08, returning 17:51 Monday – Saturday. (Although I don't know what the R means on the timetable, which could imply further restrictions). It takes ca. 1 hour 20 minutes to Cambridge (cf. 30 minutes by car). If one were to catch it to Great Chishill or Barley – even if it does go there - one would be stuck there overnight!
[Service%2031%2C%20October%202022%20revision.pdf \(website-editor.net\)](#)

Re TS 3.7 Route 7 is a regular service, but the nearest stop is Coploe Road, Ickleton, so my remarks (c) on TS3.4 above apply.

Re TS 3.8, What use is a bus that is not for public use? Anyway, it doesn't come anywhere near Elmdon. Again, the nearest place would be Ickleton.

Re TS 3.9. The [132 \(Saffron Walden – Cambridge\) – C G Myall & Son](#) bus is a Sunday bus. It would not help the commuter and, again the nearest stop is in Ickleton.

Rail

Re TS 3.10- 3.12:

- (a) Great Chesterford is the nearest railway station to Elmdon, but it has no parking facilities and is 25 minutes by bike, being 4.2 miles away from Elmdon. Walking would take 1hr 22 minutes by the shortest route (Google maps.)
- (b) This again would involve the Ickleton hill, with its winter constraints.
- (c) Great Chesterford is a large village and it is likely that all 16 of the bicycle stands would be in regular use by residents of that village.
- (d) The train service is not as good as that from Audley End station 5.2 miles away (29 minutes by bicycle, again over hilly terrain): the fast trains between London and Cambridge stop at Audley End, but not at Great Chesterford.
- (e) Most people from Elmdon drive to Audley End station if they wish to use the train to get to London Liverpool Street or Cambridge, although some drive to Royston ca. 9-11 miles away if they need the Kings Cross line.
- (f) Audley End station offers extensive - and expensive – parking, so some people now get their spouse, parent or friend to drop them off at the station and pick them up again at the end of the day, as it is cheaper. This would realistically be the option if using Great Chesterford station, too, because of the lack of parking there.
- (g) The Great Chesterford peak hour services to and from Ely are interesting: one leaves Great Chesterford at 07:07, the other at 17:05, Monday–Friday; however, the return trains to Great Chesterford are only at 08:04 and 08:35, thus rendering the Ely option redundant, as one would have to return almost as soon as one arrived or spend the night in Ely!
- (h) Given the lack of public transport to and from Elmdon and the distances involved in catching it, Elmdon cannot be deemed to be a sustainable village, either from a transport or facilities perspective. Indeed, we had difficulty finding a Ukrainian family fleeing war to house under the Homes for Ukraine scheme, because they were put off as soon as they asked about public transport. The family we eventually hosted drove all the way from Ukraine in their own car!

The Local Road Network

Re TS 3.13:

- (a) The Quickset/Ickleton Road have **NO road markings** separating lanes of traffic.

- (b) The road is an unclassified Local Distributor road. It may perhaps be 6m for most of its length, but it is only 5.2m wide opposite the proposed site entrance and is certainly less than 6m wide in other places. The useable carriageway is often only half this, due to parked cars along its length. (Not all the houses have garages or parking spaces.)



- (c) The proposed access to the site belongs to Alfreds Shott, the first property on the right beyond the 30mph “gateway” to the village, as one heads west. The property is barely visible from the road, when driving. Hollow Road hosts the first dwellings on the left. The Quickset Lane has the national speed limit of 60mph before one enters the village. Traffic often approaches the proposed site entrance faster than it should. There is a bend in the road before the proposed entrance, limiting visibility somewhat on egress.

Local Walking Environment

Re TS 3.22: There aren’t many destinations! There is a pub at Chrishall, but one can only safely walk to/from it in daylight. Some of the reasons for the children not walking to the pre-and primary school at Chrishall have been given, but time (and distance for the younger ones) would be another one. There are no destinations at Strethall, Catmere End or Littlebury Green, unless one counts churches or the playground at the latter (which I have never seen anyone use); however, one is hardly likely to be walking a muddy footpath before attending a church service! Duddenhoe End offers a village hall, but Elmdon has its own.

Local Cycling Environment

Re TS 3.25 Crash Map: it is notable that only very close proximity to the site was used for this. Just over a kilometre away (0.7 mi) is the Royston Lane cross roads. This is a locally notorious crash site. (See my earlier remarks on the applicants' Planning Statement.) A number of other accidents have occurred within a few miles of the site over the last few years: indeed, I understand there was one on 09/03/22 on the Heydon Lane, just outside of the village. (Why is this hidden away in the cycling section, anyway? Surely it would be better in the main body of the TS?)

Re TS 4.6: Surely moving the gateway closer to the site entrance would mean traffic was going faster than it currently is, despite the speed warning signs? All such signs urbanise the area to some extent. Remember, this is an historic village and a Protected Lane.

Re TS 4.7 I didn't like it when the existing gateways appeared, for this reason. Paint and anti-skid surfaces would further urbanise this entrance to the village. Not what I would call "*off site improvements*"! (TS 4.9)

Trip Generation

This whole section is complete and utter nonsense! The model is **entirely** inapplicable to a small rural village of ca. 350 inhabitants like Elmdon!

Re TS 5.1 -5.4: (a) "*Suburban or Edge of Town locations*" were used for large towns and cities like Bury St. Edmunds, Bournemouth, Poole, Peterborough, Thetford. etc. to put into the TRICS model. There would be regular bus services from such locations and a large number of facilities within walking distance. There is **NO** bus from Elmdon except the school bus (M-F, term-time only.) There are **NO** daily facilities in Elmdon. The model is **TOTALLY INAPPROPRIATE** for Elmdon!

(b) Using the K&M traffic data for Elmdon submitted as part of the TS and just looking at the hours from 6am -8pm, which is when most of the traffic occurs, it can be seen that there is no perceptible rush hour for Elmdon: traffic flows are pretty constant through the day, usually tailing off a little at both ends of this time period. (See my Appendix 1.) The average number of vehicle movements through the village along the Ickleton Road per day (6am – 8pm only, both directions aggregated) was 513. While some of that traffic might have been through traffic heading for the small villages of Chrishall or Heydon, it is also true to say that traffic volumes are still down on normal, post Covid. Many civil servants have not returned to the office at all; some have returned part time. In the private sector, some are still working from home 2 days a week. So if one were reasonably to estimate that the present traffic flow to and from Elmdon alone is 90% of that 513 (since there are other routes to Chrishall and Heydon) and that the 10% difference would be wiped away on return to normal (non-Covid) volumes, it would be possible to say that all 513 vehicle movements a day would be accounted for by the ca. 150 households in Elmdon. This would give 3.42 vm's per household per day, which seems a low figure to assume for the proposed development, given that almost all the houses on it would be likely to have at least 2 cars. On the above basis, for 18 houses, that would be 62 additional vm's/day between the hours of 6am-8pm.

(c) Looking at this another way, using the 2021 census data given at [2021 CENSUS FOR ELMONDON PARISH](#), it can be seen that in the Parish (which includes not only Elmdon, but also the sizeable hamlet of Duddenhoe End (ca. 2/3 the size of Elmdon itself) and the much smaller one of Wenden Lofts, to give a total for the

whole Parish of 611 residents), 27.1% have one car or van; 45.9% of households have 2; and 22% have 3 or more. Using this data on the estate proposed and apportioning the 18 houses according to these percentages, 1 dwelling would have no car or van; 5 would have 1; 8 would have 2 and 4 would have 3 or more. However, given the likely market prices on the finished estate, it is probable that all dwellings would have at least 2 cars or vans and be households of at least 2 people. That would give rise to at least 36 more vehicles in the village. If each went out and returned at least once a day between 6 am and 8pm, (some would come and go many times a day; others may not go out every day) this would give rise to at least 72 more vehicle movements (vm's) a day. That would represent an increase of 14% in the amount of traffic movements in the village from 6am- 8pm cf. the 513 average measured. This in itself is a significant increase, totally in line with the percentage increase in the number of dwellings in the village resulting from the proposed development.

(d) However, this being "in line" suggests a shortfall in the estimation of daily vm's from the proposed new estate. 5% of parishioners have no car and so the existing 513 vm's are accounted for by 95%, not 100% of the population. Given that 27.1% of residents have only one car or van, a higher proportion of these vm's is therefore likely to be attributable to households with 2 or more cars. The Daily Telegraph ran an article on 04/03/23 about a family of 5 who moved from London to the countryside. The mother, Jo, said. "The kids are at two different schools and some days there are three different pick-up times, so I spend a lot of time in the car." She said she also has to travel for after-school activities like football matches and swimming lessons. This is not uncommon here, too: not all children use the school bus. So for 18 houses, if we assume 6 vm's per day each on average, that would reasonably give 108 vm's/day attributable to the householder vehicles at the new dwellings.

(e) Even if that were a little too high, the above takes no account of all the service vehicles, delivery vehicles, etc., which would be associated with the new estate. Here at Great Harvesters, we often have at least 2 **delivery** vehicles per day coming up our drive **in error** which are NOT for us, but for the 5 other dwellings reachable from Farm Drive. (A 6th, the Great Barn at Elmdonbury is currently unoccupied.) However, given that delivery drivers probably deliver to other addresses in the village at the same time, it seems reasonable to assume that the extra volume of traffic from delivery drivers, service vehicles, etc. to the proposed 18 houses (as opposed to the 5 mentioned at Elmdonbury) could account for another, say, 10 vehicle movements a day through the village .

(f) Therefore, the estate of 18 new dwellings could reasonably be expected to add at least a total of ca. 100 - 120 extra vehicle movements a day through the village (household plus delivery and service vehicles.) This would be in line with the more affluent who would buy the market housing on this estate and tend to bring in more service and delivery vehicles. (A semi-detached 4 bedroom home on the Bricketts development at Newport is on the market for £820,000.) On that basis, the increase in traffic through the village between 6am and 8pm resulting from the proposed 18 house development would be of the order of 19% - 23%. Hardly the "*imperceptible*" increase claimed in the TS's point 5.4!!!

(g) One could argue that, given Elmdon has no rush hour and using the TRICS data of 11vm's per hour in the morning peak and 9 in the evening peak, averaging 10/hr throughout the day (6am – 8pm), that 140 vm's would be generated by the proposed development; however, intuitively modifying for some attenuation in the tails of the distribution, and a **slight** lunchtime and weekend lull effect, this could be seen to come out not much different from the extra ca. 100+ vm's per day (6am – 8pm) suggested in paragraph (d), where 108

was estimated. Whichever way you look at it, the extra traffic through the village resulting from the proposed development would be a **very significant increase** on today's levels.

TS Conclusions

Re TS 6.9- 11 This is clearly incorrect: to the best of my understanding, the EDS has not been complied with in terms of the junctions involved, the area is less safe than the applicants have implied (re crash data and near misses they acknowledged) and I hope I have demonstrated to the Inspector's satisfaction above that a very significant impact upon traffic flows through the village and on unclassified roads leading thereto/from would result from the proposed development.

7. Comments re: the Biodiversity Checklist (BC)

Re BC Table 2.2: NO was ticked as the answer to *"Is there a 'reasonable likelihood' that the development will affect (either directly or indirectly) a site or habitat in column 1 prior to applying mitigation?"* regarding **Priority Habitats**. This seems incorrect to me: the site includes a Woodland Priority Habitat Network (England) site of High Spatial Priority. The proposed access road would go through it, involving the felling of many trees.

Re BC Step 3: *"Does the application site contain or is it adjacent to: a lake; river; canal; stream; ditch; marsh; or reedbed?"* NO has been ticked; however, the application site is a ca. 2m in vertical distance from the ditch at the base of the hedged bank along Ickleton Road which forms the S boundary of the site. It **IS** adjacent to a ditch.

"Does the application involve new lighting of a building/ structure with features suitable for bats or barn owl (e.g. described in row 1 above); or lighting of green space within 50m of woodland, water, hedgerows or tree lines?" Again, "NO" has been ticked, yet the application site includes the hedgerow along Ickleton Road. Street lighting is proposed for the development, albeit low intensity. It is unclear if lighting would be applied along the access road, which goes **through the woodland**, or round the proposed green space with the pond, but some of the dwellings would be within 50m of the woodland anyway. These would presumably have outside lights and possible security lights. Some of them might have garden lighting schemes.

"Does the application site contain trees that are older than 100 years; trees with obvious holes, cracks, cavities, rot, loose bark, woodpecker holes; or trees with a girth greater than 1m at chest height?" Again, NO has been ticked, yet there are trees in the woodland with holes, cavities, peeling bark, rot, etc.

"Does the application site involve disturbance, modification, demolition or construction on/in: gravel pits; quarries; natural cliff faces; or rock outcrops?" NO has been ticked. I should perhaps point out that the village chalk pit is in very close proximity to the site (est.90-95m), just up the unmade track from the entrance to the proposed site.

"Does the application involve the modification, disturbance or removal of: mature or over-grown gardens; rough grassland; scrubland or allotments?" NO has been ticked. The woodland floor and embankment leading up to the paddock have rough grassland. The access road would destroy some of this.

Re BC Table 3.2: it is asked, *"Is there a 'reasonable likelihood' that the development will affect a species in column 1 prior to applying mitigation?"* The first category in column 1 is *"European Protected Species"*, the

second category is “*Nationally Protected Species*” and the third category is “*Priority Species*”. To all of these, the applicants have answered NO. However:

- I know for sure that badgers have been reported with their young on or within a few metres of the site. I believe that there is at least one active badger sett proximate to where the proposed access road would run.
- Trimming or cutting trees or rough vegetation can disturb birds, as can noise, lighting and vibration. [Wild birds: protection and licences - GOV.UK \(www.gov.uk\)](http://www.gov.uk) At least one Barn Owl frequents there to hunt. I saw it myself only the other day and many residents along the Ickleton Road have seen it over the paddock.
- I also know that there are many bats in this area. It is certain that bats will fly over the site. I cannot say if they roost in the woodland.
- There is also a small possibility that Great Crested Newts are present. A GCN typically ranges ca. 500m from its breeding pond, inhabiting woodland hedgerows and tussocky grassland in the vicinity. There are a number of ponds on the Elmdonbury estate, some within 500m of the site, some just over this distance. They were surveyed in November 2009 in relation to a planning application being made by one of the same applicants (UTT/1007/10/OP) Two were found to be average for GCN’s and one, good. However, fish were present and they were heavily shaded, both of which GCN’s don’t like. Since, much clearance of vegetation has occurred round the nearest pond to the current application site, it is more likely to harbour GCN’s than it was. The survey was done in October, but the GCN’s only use the ponds for breeding in the spring. There are many hedgerows and woodland between the nearest pond and the site, plus a usually damp ditch at Great Harvesters, so there are possible corridors for GCNs to use if they are present at Elmdonbury.

8. Comments re: Statement of Community Engagement (CE)

Re CE1.8: I would challenge that the applicants have worked “enthusiastically” to engage with the local community before submitting the application to PINS. Only 2 days’ notice was given for a brief exhibition in the village hall on a Friday evening. My husband and I attended, having seen the notices, but were unaware that a presentation was being made at the start of the session, so we missed that, if it took place at all. Did it? Many others would also have been unaware of this and missed it. There were no concrete proposals, just a couple of pictures of what one of the applicants said they “might” do. It was most unsatisfactory. I saw no facility to leave written comments or to record how many villagers attended. There were no further meetings or presentations or further discussions with any villagers, to my knowledge.

Re CE1.9 The applicants definitely had a choice **not** to bring forward this site! They knew full well that it had been rejected after UDC’s Call for Sites in 2015. Far from making a “lasting positive contribution to the village”, this urban proposal seeks to destroy its character, damage the setting of some of its listed Buildings and the Conservation Area and form a highly intrusive blot on this sensitive landscape in this beautiful countryside. It would not support the services in the village: there aren’t any! Instead, it would put a strain on the schools in the area, particularly Chrishall Primary School. Local residents have demonstrated that there is no need for affordable housing in Elmdon, but even had they shown the opposite, this application is for 100% market housing. Even if some affordable housing were forthcoming from the proposed

development, how would the residents of such then afford the service charge on the development? If a need were to develop for affordable housing, there are far better places in the village to put it than on this prominent site which would increase the flood risk for current dwellings along the Ickleton Road and Elm Court. The children's play area and green space offered by the applicant are neither needed nor wanted: there are other places to play (play equipment in sizeable village gardens and the playground at Chrishall School.) There is a playground at Littlebury Green, but I have never seen it being used. The village already has plenty of open green space in the form of the cricket ground. The play area would be at the highest part of the site – hardly tucked away – and would be accessed by a footpath, the entry to which would be dangerous.

Re CE 1.10 the site has no planning history, except for the rejection by the LPA in the 2015 Call for Sites. The layout is utterly alien to the village. It is nothing at all like Elm Court or Horseshoe Close, as the applicants have claimed in their Application Statement. At the discussion of the site at the UDC Planning Committee Meeting on 08/03/23 to form the LPA's position on the application to PINS, it was remarked that there is nothing like it in the whole of the Uttlesford District and that it resembled a suburban housing estate.

Re CE 3.3 A safe access to the site is not achievable. I trust the Inspector is cognisant of the dangers, having read my earlier remarks on this.

Re CE 3.4: I bet they are "*willing to make a contribution to support existing local facilities*"! Zero cost to them, then! What existing local facilities?!!!

Re CE4.1: The applicants' so called "community engagement" on a village scale was very low grade. There is only their word for it regarding their summary of villagers' comments. Given the inaccuracies which riddle this application to PINS, how much is that worth? The only thing I know for sure is that there is extremely strong opposition to developing this site. I see no evidence that this scheme has been discussed with the LPA before applying to PINS, either: indeed, the application form indicates the contrary in its section 5.

9. My Other remarks

A. National Planning Policy Framework (NPPF) changes

The Government intends to bring into effect speedily changes to the NPPF. The Levelling Up and Regeneration Bill has already passed the House of Commons and gone to the House of Lords. These changes have bearing upon the current application insofar as they:

- (a) Give greater weight to communities to say how they wish development in their immediate area to proceed. (Elmdon has a VDS, adopted by UDC in June 2019.)
- (b) Give greater emphasis on securing our food supply. Presumably, this will afford more protection to BMV (Best and Most Versatile) Land. (The site land is Grade 2.)
- (c) Support the natural environment and respond to climate change. Habitat and species protection are relevant here, together with protection against flooding and minimising emissions by siting development where there are other realistic options to using the motor car. Even if electric vehicles become rapidly more widespread which looks unlikely at present, they can pollute the environment more remotely, where the electricity is generated, and locally through the emissions from tyres and

brakes. Building on the greatly depleted and ecologically vital chalk aquifer which feeds the globally rare and important chalk streams seems inadvisable. The now ended consultation [Levelling-up and Regeneration Bill: reforms to national planning policy - GOV.UK \(www.gov.uk\)](https://www.gov.uk/government/consultations/levelling-up-and-regeneration-bill-reforms-to-national-planning-policy) of December 2022 says, “We also propose to do more to support environmental enhancement, nature recovery and climate change adaptation; to mitigate the effects of pollution; and to embed the important reforms introduced by the Environment Act.” The Environment Act 2021 [Get in on the Act: The Environment Act 2021 | Local Government Association](https://www.local.gov.uk/news/2021/12/16/get-in-on-the-act-the-environment-act-2021) now mandates “a net gain biodiversity through the planning system”. This proposal would deliver a net loss in biodiversity.

- (d) The NPPF Consultation point 7 says, “**planning for housing is not just about numbers; 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.**” The proposed site is the wrong place in the wrong village. Elmdon neither needs nor wants this large housing development. The extra traffic would place strain on the local road network. The extra population would overload the village hall (which is just about adequate now in most instances) and Chrishall Primary School, which is full. It would create a noisier village because of the extra traffic. It would adversely affect the amenity of those living on the Ickleton Road, particularly, especially those opposite the site from this and from the overbearing new dwellings on elevated ground affecting their bedroom privacy. It would severely damage the landscape character and be deleterious to the village’s character, its Conservation Area and some of its Listed Buildings, including the Church. It would urbanise the entrance to the village along the Protected Lane of Quickset Road and increase the volume of traffic on other Protected Lanes in the vicinity, notably Hertford Lane. It would destroy part of a designated woodland and valuable meadowland, as well as some hedgerow. It would increase the flood risk for part of the Ickleton Road and Elm Court. It would increase the likelihood of vehicle crashes in the village and at the Royston Lane crossroads. It would pose a risk to pedestrians and cyclists through inadequate and/or inappropriate provision for them. In short, this development would be in the WRONG place. The application does NOT constitute sustainable development. The Consultation point 9 under, “Introducing new flexibilities to meet housing needs” “recognises the importance of being able to plan for growth in a **way which recognises places’ distinctive characters and delivers attractive environments which have local support**”. This proposal drives a coach and horses through that sentiment.
- (e) The Consultation point 14 under the same heading stresses that the emphasis will be on development on brownfield land in urban locations to reduce the need to travel, thus supporting sustainability. The government wants to “*further strengthen the links between planning and transport in pursuing sustainable patterns of development.*”
- (f) In the Consultation Ch5.20, the government declares, “*We are keen to explore whether past irresponsible planning behaviour should be taken into account when applying for planning permission.*” The previous point indicates that “*instances of irresponsible individuals and companies persistently breaching planning controls or failing to deliver their legal commitments to the community are not uncommon. It is particularly frustrating when local communities see these individuals and companies securing planning permission again despite their blatant disregard for the rules.*” Let me just leave it for now at saying that I think this change would be a very good idea. Should the Inspector wish to discuss any specifics, please contact me. I have evidence.

B. Human Rights Act

I believe that the Human Rights of me and my husband are being breached by the continual stream of development with which we have had to contend from the applicant Mr. Robert Smith, since he purchased Elmdonbury in 2004. We moved to Great Harvesters in late 2000. We have suffered months of stress and many sleepless or sleep deprived nights as a result of his development-related scheming, plus literally years of disturbance from his developments and additions thereto. This application is the last straw. If planning consent were to be given for this application, we would face another 1- 3 years of noise and disturbance. We

have had enough! We have a right to a peaceful life. If this counts as part of our amenity, it is a planning consideration, but, since planning should be conducted in accordance with the law, I think it is relevant to add this here, anyway.

10. My Conclusion

I respectfully submit that this application should be refused on the grounds of sustainability, as it is counter to the NPPF in a large number of ways:

- There is essentially no public transport provision in or close to Elmdon;
- Elmdon is a considerable distance from secondary schools, doctors, dentists, shops and most sporting and leisure facilities. The next village, Chrishall, has a pub and a school, but the latter is over-subscribed. The car is the only viable mode of transport, apart from school buses. There is no footpath along the Heydon/Hertford Lane to Chrishall. Cross-country footpaths are often muddy and are unsuitable after dark.
- Elmdon's small village hall is adequate for most purposes but cannot accommodate further significant capacity, such as would be added by the proposed development.
- The proposed development would add ca. 19% plus throughout the day to the volume of traffic going through the village between 6am and 8pm. This would lead to increased dangers, intermittent congestion and a considerable increase in noise, particularly along the Ickleton Road. The increased noise would damage the amenity of residents.
- The proposed access is already unsafe and would create further significant dangers to motorists, pedestrians and cyclists.
- No footpaths or cycleways are proposed to/from the new dwellings. The proposed footpath to the suggested children's play area and green space could not be safely accessed from Farm Drive or Ickleton Road. There is no path to it from the proposed new housing estate.
- The NPPF states that good design is a key aspect of sustainable development. (Point 126.) The site layout is alien to the village and to Uttlesford District. It is suburban in style.
- The site is elevated and sloping. It would pose a flood risk to numerous properties in the village, despite the proposed SuDS design, which requires regular maintenance by individual householders, as well as by a management company. The attenuation pond presents a risk to children and would become an eyesore in summer. It is an unnecessary choice and is located in a sub-optimal position within the site layout.
- If the sewers along the Ickleton Road and Elm Court (the nearest sewer) could not cope with the extra demand, foul water flooding would result in these areas.
- Development of this elevated site would result in the new dwellings being overbearing in relation to the existing homes along the Ickleton Road. These latter homes would also suffer from overlooking of their bedrooms by both some of the reception rooms and bedrooms of

the new dwellings. These factors would be damaging to the privacy and amenity of existing residents.

- Development of this site would involve the destruction of BMV Grade 2 greenfield land outside village development limits.
- It would destroy part of a Priority Woodland Habitat Area of High value, including tussocky grassland and mature trees with microhabitats. This would have a deleterious effect upon the whole ecosystem of that wood. It would also destroy a small amount of hedgerow.
- It would disturb and adversely affect a number of protected species: bats, badger and barn owls (possibly to destruction in the latter case, by reduction of its hunting ground). It is possible that Great Crested Newts could also be affected. A badger sett thought to be active could be damaged or destroyed.
- It would place more demand on the severely depleted chalk aquifer in the driest county in the country. This, in turn, would further damage the watercourses on the chalk and their distinctive ecosystems, which are rare and precious on a worldwide scale.
- It would damage the Dark Skies area in which the village is set, irrespective of which type of street lighting was used: light would spill out from these due to the elevated location. There would be no control over lights in and on houses and gardens.
- The proposed “gateway” alterations would urbanise the entrance to the village along the Protected Lane of Quickset Road, which currently gets one of the higher ratings in the locality (20.) On entering the village, its character would be detrimentally affected by a large new housing estate on elevated land, made more visible by the felling of a considerable number of trees.
- The development would damage the setting of two Grade II Listed dwellings: The Hoops and Mulberry Cottage, plus the Listed red Telephone Call Box (TCB).
- It would vie with the Grade II* Listed village church for attention in the view of the village and wider landscape from the historic Icknield Way (both a public bridleway and footpath). Similarly, it would compete with the Grade II Listed thatched barns and complex at Elmdonbury and would detract from the views into the village Conservation Area, of which the latter are a part.
- It would damage the character of the village, both as seen from the public rights of way on the opposite hillside (including from the scheduled Ancient Monument of the Mill Mound on the Icknield Way), and from within the village, along the Ickleton Road and Farm Drive. It would also be clearly visible from Hollow Road and between buildings from Horseshoe Close.
- It would be extremely destructive of the Elmdon Chalk Upland Landscape Character area. This is highly sensitive to development. It would remove the characteristically open feel of the landscape by bringing urbanisation down into the village where there are now open fields and by blocking from view most of the hillside on which it would be situated by dint of the low and descending chalk ridge on that side of the valley.

Thus, the proposed development would **fail** the sustainability criteria of the NPPF:

- **an economic objective** – this is NOT land of the right type; it is NOT in the right place and it is being brought forward for consideration at a time when the country is starting to realise its scarcity of resources: BMV land, clean water, dark skies, rapidly disappearing wildlife species, etc. There is inadequate infrastructure in and around Elmdon to support such a large development.
- **a social objective** – there is NO identifiable demand for affordable housing in Elmdon. Even if there were, this is the wrong site for it. The actual application (despite the distractive waffle given by the applicants) is for 100% market housing. Affordable housing would anyway be out of the question, given the proposed maintenance charge. The design of the proposal's layout is anathema to many, reflecting none of the local character and creating a number of dangers. A development of this size in the village would place huge strain on the local infrastructure, such as it is. It would cause psychological harm to those of us who love to walk in the beautiful, special countryside surrounding Elmdon, as we would no longer be able to do so without our senses being assaulted by the alien intrusion that this development represents.
- **an environmental objective** – this development would be land hungry. It would cause immense damage to the landscape, to the historic features of Elmdon, to its character and to its wildlife. It would be detrimental to biodiversity: note that no net gain has been claimed here, yet a 10% gain is now a legal requirement. It would generate noise and pollution from the initial construction and from the long term traffic uplift (estimated at ca. 19%+ over current levels),

I request that the Inspector makes a site visit. Please refuse this application for unsustainable development. Should a Hearing be held on this application, I respectfully request that I might speak at the Hearing.

Yours faithfully,

Evelyn Pick

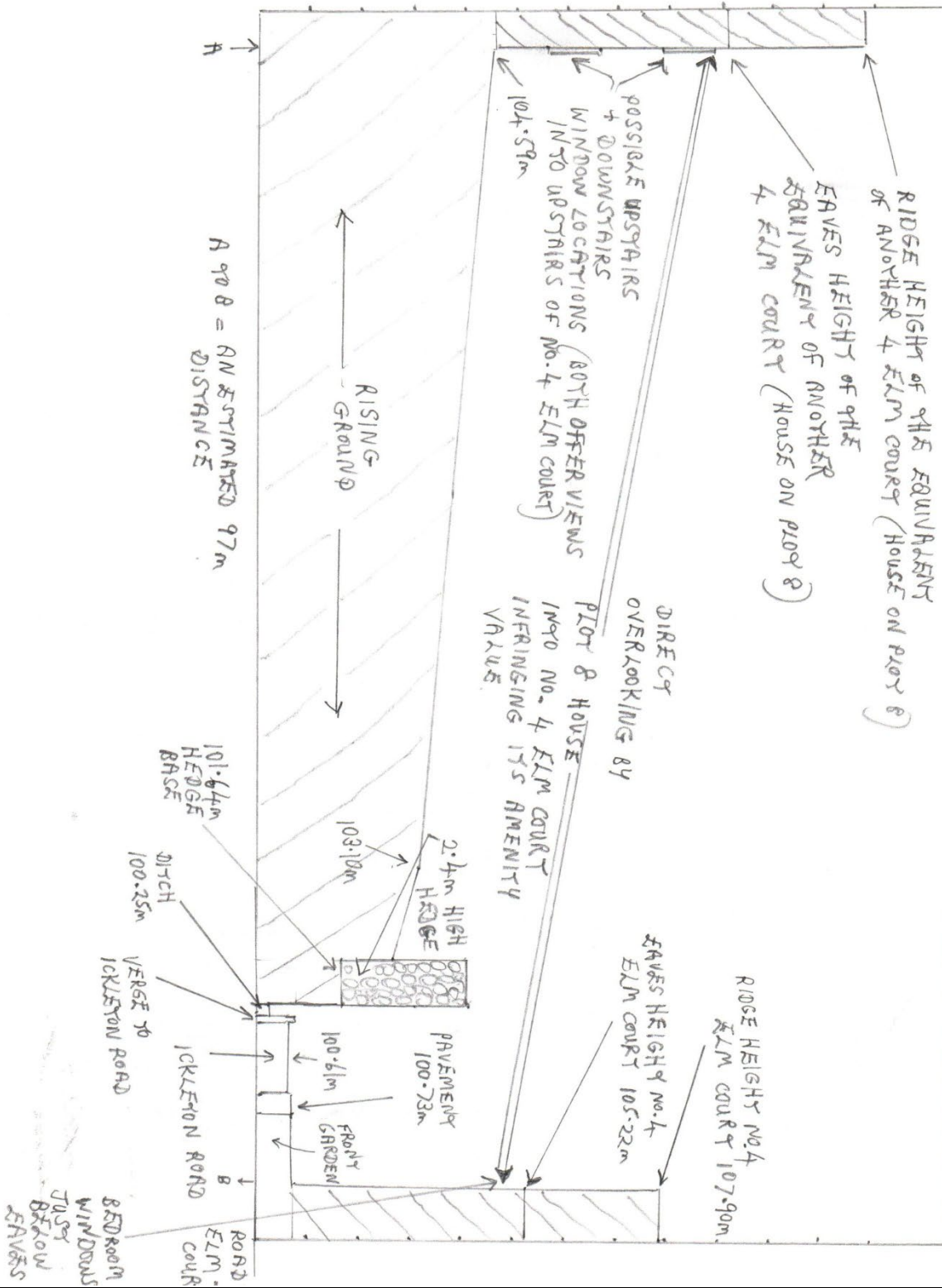
APPENDIX (A)

TRAFFIC PER HOUR AND DAY, 6AM-8PM (from K & M survey data, Ickleton Rd.)

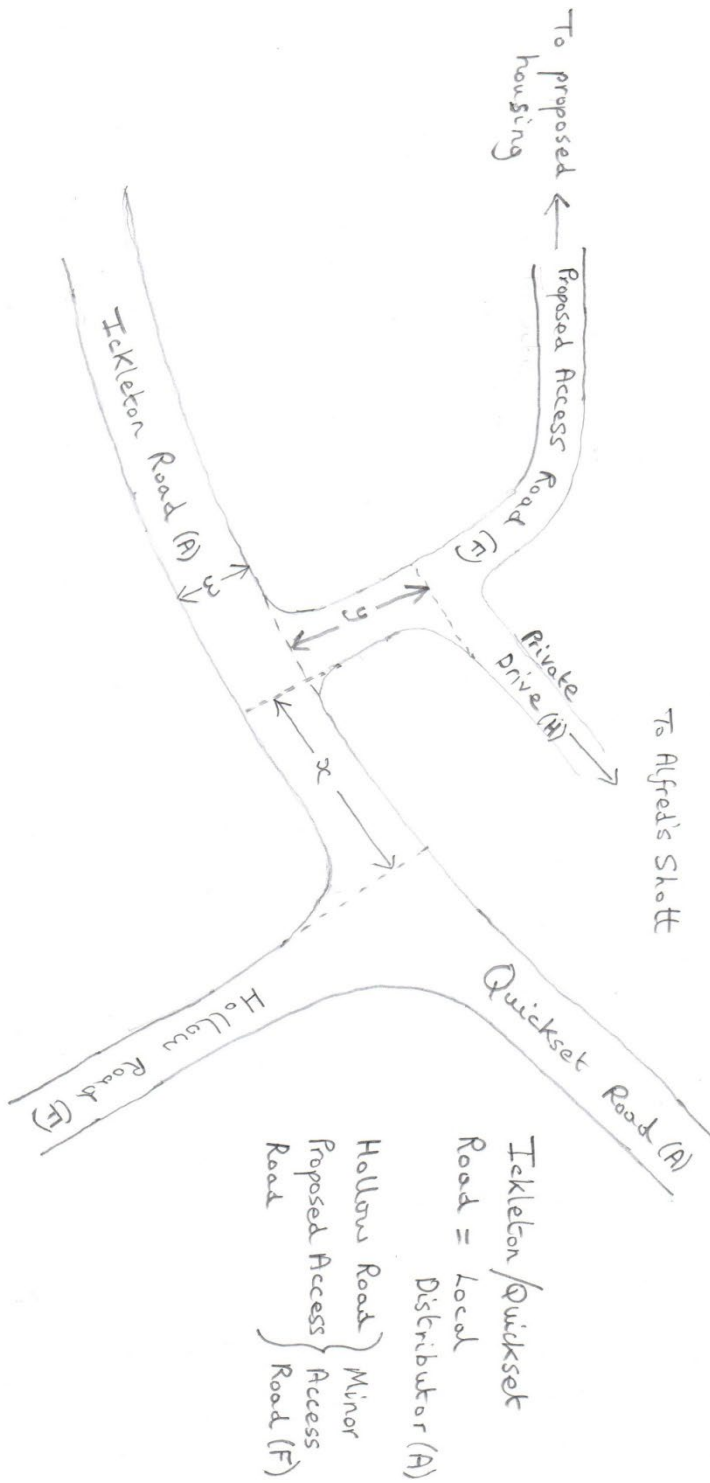
	8/7/22	9/7/22	10/7/22	11/7/22	12/7/22	13/7/22	14/7/22	7 day total
WESTBOUND:								
6-7am	10	5	3	11	12	8	9	58
7-8am	12	8	6	21	23	19	12	101
8-9am	22	15	19	18	21	18	25	138
9-10am	25	25	20	14	16	19	21	148
10-11am	20	27	17	22	13	14	18	131
11-12 noon	16	23	23	15	19	13	33	142
12-1pm	12	18	15	18	12	14	18	107
1-2pm	14	17	21	21	12	14	14	113
2-3pm	20	23	20	10	15	22	16	126
3-4pm	25	30	15	27	20	14	24	155
4-5pm	24	18	17	29	28	29	30	175
5-6pm	24	15	12	11	26	22	24	134
6-7pm	16	5	10	16	12	28	21	108
7-8pm	18	6	10	21	13	17	14	99
Overall 6am-8pm	258	235	216	254	232	251	279	1,735
EASTBOUND:								
6-7am	25	11	7	19	21	31	22	136
7-8am	34	15	15	39	28	33	34	198
8-9am	23	21	24	25	20	25	26	164
9-10am	23	31	43	22	30	25	24	198
10-11am	34	27	32	21	26	23	23	186
11-12 noon	16	19	15	16	15	19	21	121
12-1pm	24	19	14	23	17	22	19	138

1-2pm	20	8	14	18	17	16	15	108
2-3pm	22	11	15	21	17	16	19	121
3-4pm	27	14	17	17	17	23	21	136
4-5pm	19	18	8	20	19	27	18	129
5-6pm	21	9	14	18	16	12	20	110
6-7pm	6	10	11	6	11	14	12	70
7-8pm	2	10	5	7	7	8	4	43
Overall 6am-8pm	296	223	234	272	261	295	278	1,858
WEST + EAST 6am-8pm	554	458	450	526	493	546	557	3,593

APPENDIX B : CROSS-SECTION PLOT 8 TO 4 ELM COURT



Appendix C



Sketch showing junction distances

(Not to scale)

$x \approx 7.35m$ (before widening of access)
 $y \approx 9.66m$
 $w = 5.02m$

Appendix D

I printed out a photo from the VDS (pg.5), cut out a couple of houses from it, and superimposed them on the photo of the site. I then took a photo of the result, below. This gives just a glimpse of how intrusive the proposed development would be. (The green area below the superimposed houses would, of course, be filled in with housing on the lower part of the site, rendering the area round the proposed pond invisible and the whole area looking built up. Of course, there would be many more houses on the site than those I superimposed, should the development be allowed to proceed.) Note how the new houses would obscure the hilltop ridge behind, which is less wooded behind the E of the site. Indeed, a considerable number of the trees shown here behind the superimposed houses have been felled since one of the applicants converted the grain dryer to his home, affording him wide-ranging views across the surrounding landscape.



*Elmdon – showing open spaces
and farmland*

Elmdon

The photograph on the next page shows the proposed development site from the air, indicating how extensive it is. (Please excuse the green table top below the photo.) Even then, not all the site has been outlined here: some of the woodland to the E., through which the proposed access would go, has not been outlined in red. This site photo is courtesy of Mr. P. Kay and Mr. and Mrs. B. Carter. The earlier wide angle one of the church, the Elmdonbury barns and the site (coloured red) on Pg. 10 is courtesy of Mr. P. Kay, as is the above one (before my amendment) from the VDS.



Below is a view of some of the site in the landscape, taken from a public footpath.

