

Duncan Sturrock

[REDACTED]

3rd May 2023

Dear Sir/Madam

**Uttlesford Planning Department
S62A/2023/0018 (UTT/23/0966/PINS) – Outline planning application with all matters reserved except access for up to 31 dwellings (Land East of Pines Hill Stansted)**

I write in connection with the above planning application. I have examined the plans and the site proposed. I wish to strongly object to the development in this location for the following reasons:

1. The land is designated as Metropolitan Green Belt

This site is within the Metropolitan Green Belt and should not be a priority for development within Uttlesford.

The most recent Uttlesford Green belt review (ARUP - 2016) recommended that none of the green belt sites are to be released or re-designated. It is clear from the 2016 report that an important part of the rationale behind this is to prevent the sprawl of Stansted Mountfitchet towards Bishops Stortford. The report details that alterations to the green belt designation should only take place in "Exceptional circumstances". As it stands there are plenty of brownfield sites proposed for development in the call for proposed sites in the new local plan. With this in mind there can surely be no justification for releasing designated green belt land for property development. The housing needs and requirements placed on Uttlesford should be established through the new local plan and in the interests of the communities within it must be able to be met without building on designated green belt land.

It is of note that the developer (Luxus homes) during their previous application (UTT/21/2730/OP) advised that they will increase the provision of social housing within the proposed development from the required 40% to 48%. The developer has also made reference to the "First homes scheme". In both cases this is quite clearly an attempt to gain "very special circumstances" (VSC) and as such get the permission to build on designated green belt land. In a development of 31 properties the developer would be giving over somewhere in the region of 3 more properties in an attempt to qualify for "very special circumstances". Is 3 more properties really enough to mean that designated green belt land can be lost forever? The developer (Luxus homes) makes reference to what they believe is a comparable development in Colney Heath. This scheme however was for 100 units where an increase from 40% to 48% obviously provided 8 more units for social or affordable

housing. This is not and should not ever be enough incentive to lose designated green belt land when there are brownfield sites or similar that could satisfy the quota.

I would expect the Secretary of State to take stock of the superficial approach that the developer has taken when trying to gain your permission to build on designated green belt land. Surely the very small number of social houses provided by this development cannot justify building on designated green belt land? Building on such land can only be for profit and have nothing to do with a sensitivity towards the local area or its inhabitants.

Planning applications should be based on an approved local plan and where the most suitable and sustainable sites are utilised first. It should never be the case that in the absence of a local plan that developers can deploy opportunistic tactics to gain approval to build on designated green belt land.

2. Local Plan and Questionable Deliverability?

It is questionable whether the developer can deliver their proposed plan inside of the timeframe set out. There are clearly a large number of ecological and highways works that would need to be completed in the unbelievable event that the Secretary of State approved this plan. The above issues are not addressed in any level of detail within the developers planning application.

Uttlesford District Council at present does not have an up to date local plan and will likely not have one until 2024. This site despite being designated green belt has been put forward in the latest call for sites. It is obvious that the developer is aiming to take full advantage of this situation with no regard whatsoever for the local community. It would be an extraordinary oversight on the part of the Secretary of State to grant permission of this site until all sites are considered that have been put forward as part of the councils call for sites. These sites undoubtedly will be made up predominantly of brownfield sites and as such are a far more suitable and sustainable way of providing the numbers of housing Uttlesford District Council is expected to provide in the years to come.

The reasons it would be extraordinary are:

- The site has already previously been refused planning consent for housing on 2 separate occasions for reasons that still exist.
- It is in a designated Metropolitan Green Belt
- It will have known ecological impacts (such as protected doormice, slow worms, great crested newts, bats, owls, deers, badgers and the like). The biodiversity “checklist” provided with the application is woefully inadequate for a site that contains so many species of ecological interest.
- The area contains important woodland, which is defined in the Local Plan, particularly where proposed access to the site is mapped.

- According to the Stansted Mountfitchet Neighbourhood plan to 2033, the land in question contains multiple Tree Preservation Orders and Statutory Designations (<http://www.hwa.uk.com/site/wp-content/uploads/2020/10/SSE112-Stansted-Mountfitchet-Reg-14-Neighbourhood-Plan.pdf>)
- The known highways issues around the site which include a road known for regular accidents, pathways and verges which are dangerous for pedestrians. Pines Hill is specifically cited in many local planning applications as unsustainable for transport to the local area, in the volume it is used. Building on it and providing access via it, especially when other larger scale developments and projects actually require it, would be detrimental.

It is clear that there are a number of issues with this site that the developer needs to consider. I would expect The Secretary of State to reject the developers application on the basis that this site should only be considered (if it all bearing in mind it's green belt status) alongside a full range of options for the local area as part of the councils new local plan (when complete). I am not opposed to development, but surely development of green belt land should not be an option when there are other sites that could provide more homes for people without the sacrifice of areas designated as Green belt and where road safety is already an issue.

3. Previous Planning Rejection

The proposed development is in the same location as previous planning applications which were rejected by the District Council. The first rejection was in 2014 (UTT/14/0151/OP – 2014). Luxus Homes first application was rejected in 2021 under UTT/21/2730/OP. The reasons for both of these rejections still stand and hence it is nonsensical for this application to be considered once again. The previous decisions were presumably not appealed because of the clear and obvious reasons for rejection. The reasons for rejection were:

1. The site lies within the Green Belt – inappropriate development
2. There are protected specie such as badgers, reptiles and bats
3. The increased pressure on local education and health facilities

Points 1 and 2 very clearly still stand.

Whilst the applicant now proposes a smaller scheme, a development of 31 new homes would still give rise to increasing pressures on local highways, education and healthcare. The applicant has failed to provide sufficient information (or in fact any community benefit) on how they will seek to address these impacts on local services. There is NO benefit to the community or residents of Stansted Mountfitchet of this development.

4. Highways and Traffic

The development is proposed on one of the most dangerous stretches of road in Stansted. Worse still, the developer is proposing access from a road which is already highlighted in many local planning applications as unsustainable, dangerous and an accident hotspot. Whilst I am sure the developer will have considered a wider than normal entrance/exit at the junction with Pines Hill, this may be considered as safer but under NO circumstances should it be considered SAFE due to its close proximity to a blind summit. There are already issues with people walking on the limited pathway on that stretch of road so it would be negligent to even consider that narrow and busy stretch of road as suitable for increased pedestrian usage. The footpath is totally inadequate and dangerous.

As residents we all drive around Old Bell Close to avoid turning out directly on the brow of the hill onto the B1383 where there is poor visibility and regular accidents, including one very serious collision (26th August 2020 – 0138). It is notorious for high volume traffic, speeding vehicles and high numbers of HGV and construction vehicles, supporting development to the north of Stansted.

The roads in and around Stansted struggle to cope at the best of times with all of the demands placed upon them. These demands are made not only by local residents but those from elsewhere who need to drive through the village to access the M11 or Bishops Stortford for example. This is without even taking into account the large number of HGV's that drive along Pines Hill to service all of the recent building that has been taking place in and around the village.

I believe the site also needs to address BAA Safeguarding measures, which is not addressed at all in the application.

5. Extensive Development in the local area

Since 2001, extensive development has taken place in Stansted Mountfitchet and the population has increased by over 60%. My concern that if development continues in this fashion is that this lovely village will cease to be a village and become a small town. Whilst I understand the government policy to build new homes I feel I that such development(s) should take place in the right places and in a manner sensitive to that area. The proposed development fails in respect of the above two points. This is NOT sensitive. This is NOT in the right place.

It is also of note that there are severe drainage/water issues in Old Bell Close. This has led on a number of occasions to Sewerage and flood waters affecting people's properties. The developers plan relies on utilising this already overstretched drainage system. This is unacceptable and would without doubt cause more issues in Old Bell Close. Issues that have already seen people having human excrement on their properties and flood waters in their homes.

6. Proper Public Consultation

As it stands at the time of writing this representation I have not received any correspondence from Luxus Homes with regards to their plans for the proposed site. I would of thought that this may be something that a company may do as part of a courteous, professional and community minded approach.

I would expect the Secretary of State to see that this is not a sustainable development that benefits the local community on any level. It is a blatant attempt to gain planning consent by exploiting the delay to the new Local Plan, however the site remains in the Green Belt, and the NPPF makes it clear that development in the Green Belt is inappropriate development which should not be approved except in very special circumstances. It is insulting to suggest that any very special circumstances have been provided for the development of this Green Belt site. The developer is showing no regard for the due planning process, and is simply seeking to exploit our community.

Yours Sincerely

Duncan Sturrock