

Stebbing Parish Council Comments

S62a/2025/0077 – Land West of High Street, Stebbing

UTT/25/0151/PINS

- 1.1 Stebbing Parish Council (**SPC**) objects to this application which is seen as a direct challenge to the 'made' Stebbing Neighbourhood Plan (**SNP**) and specifically the deliberate attempt to undermine the democratically made decision of Stebbing residents to vote Yes at the Referendum in June 2022.
- 1.2 Should it be deemed necessary that there be a Hearing to decide on the outcome of this application Stebbing Parish Council would wish to represent their residents by speaking.
- 1.3 The application is on two parcels of agricultural land that are part of a much bigger agricultural holding. They are outside the Development Limits but with elements both within and adjacent to Stebbings Conservation Area. The two fields are designated as Local Green Space in the Stebbing Neighbourhood Plan (**SNP**) and should be respected and treated as Green Belt when development is proposed in them. (**NPPF para. 143**) **SPC does not accept that** the applicant has demonstrated very special circumstances as to why development should be allowed. Stebbing Parish Council does not believe or agree that the reasons the applicant states are either accurate or valid for having the application approved.
- 1.4 The Parish Council believes that policies within the **SNP** comply with the up-to-date **NPPF paragraphs 106; 107(a)(b)(c)** as demonstrated at section 2.3.

1.4 Stebbing Parish Council recognises that the SNP (at present) provides for 14 to 20 new dwellings this having been agreed under examination by the Inspector.

https://www.uttlesford.gov.uk/media/11296/Examiner-s-report-on-the-Stebbing-Neighbourhood-Development-Plan-2019-2033/pdf/Examiner_Report_UDC_StebbingNDPA.pdf?m=1683902787263

However, time has moved on, and **SPC** has been proactive in replying positively to the question from Uttlesford District Council to Parish Councils with made Neighbourhood Plans in the Regulation 18 consultation and reiterated in our Regulation 19 (that we would through, updating the SNP agree, to allocate the number of dwellings subsequently to 109). To that end the Steering group has re-established and has already begun the groundwork and planning to review the SNP and the eventual allocation of sites, to include the consideration of an "Exception Site" for residents of the Parish if considered appropriate and necessary. This will include a call for sites. Stebbing Parish Council is realistic, homes are needed and Stebbing must play its part, it does not however accept that this application in any form should be placed on this Local Green Space, and it will certainly not enhance the tranquil and agrarian setting that is much loved and appreciated for itself as well as the setting of the Heritage assets.

2. 1 Neighbourhood Plan Policies

This application is contrary to the following Policies:

STEB1: Respecting Stebbing's Heritage – Design & Character

STEB4: Local Green Space

STEB6: Important Open Gaps

STEB7: Important & Protected Views

STEB9: Design Principles & Location of New Development (part 2)

2.2 STEB1: Respecting Stebbing's Heritage – Design & Character (Page 30 SNP)

This application is not just contrary to the SNP policies but also fails to meet its first 'Core Objective' (page 12 SNP)

"To conserve and enhance the heritage and distinctive historic character of the Parish, its village, surrounding settlements and each of their respective landscape settings."

The application for 28 dwellings does not respect Stebbing's Heritage, it adjoins the Northern edge of the Conservation Area and does not contribute positively to the street scene, is not sympathetic to the neighbouring buildings, especially, creating a continuous line of dwellings, taking away the open feel and agrarian connection that this Local Green Space provides. The visual appearance of the properties would be out of character from those surrounding and is uncomplimentary to them. We do not believe that the heights and design of the proposed dwellings will have a positive impact both on the street scene and the views from the PRoW/ Byways

The inclusion of the car park along with the dwellings in the south site, apart from creating an urban look from the High Street and opposite the school it also impacts on what is an agrarian historical landscape of unimproved pasture which would cause harm to the listed buildings within the Manorial setting, namely Stebbing Park Grade II* & Stebbing Park Barn Grade II. The car park will be viewable by walkers from the PRoW which is situated between the historic Motte and the High Street.

The applicant states that the Listed Monument – Stebbing Motte will not be impacted as cannot be seen, that is not so, especially during the winter months. The design of this application will neither conserve nor enhance any of the heritage assets. The prospects of dwellings being located within the setting of the Motte will destroy forever the understanding of the original landscape over which the motte castle exercised control. Historic England's comments that "..... motte castles generally occupied strategic positions dominating their immediate locality and as a result are the most visually impressive monuments of the early post-Conquest period surviving in the modern landscape.

We note and support Historic England's comments and objection both in the original application UTT/23/2496 /FUL and their continuing objection to this current application.

2.3 STEB4: Local Green Space (Page 43 SNP)

The **Local Green Spaces (LGS) designation** within the neighbourhood plan are in accordance with the NPPF paragraphs 106 & 107. All the LGS were examined and considered by the Inspector of the NP to be consistent with the NPPF current at that time and are still valid.

They stated that the **Field Opposite the School** '.....is valued for its historic importance and is popular with walkers who enjoy the views across the site it is adjacent to the Mill Lane recreation ground and Cricket Field but lies mainly outside the conservation area with only a small element falling within the conservation area. I note that the heritage assessment considers the space to form part of the setting of the Conservation Area and that its Parkland character contributes to its significance indicating it is clearly part of historic Stebbing Park. It is contiguous with the Mill Lane recreation ground and Cricket Field' (Page 21section 5 Independent Examiners Report)

Field Opposite the Downs '..... Is enjoyed for the views by walkers and other recreational users as well as its historic importance I saw at my visit the site affords views.' (Page 21section 6 Independent Examiners Report)

This Local Green Space is compliant with NPPF paragraphs 106 & 107 especially relevant are 107 (a)(b) and (c) in that it is obvious that both fields are in close proximity to the community it serves. Both fields do hold a demonstrably intrinsic value to the residents of Stebbing in terms of their beauty; the historic significance and the tranquillity that emanates from the totality of both fields in this LGS. This is also reflected in their inclusion in policy **STEB7**

Historic England states that Stebbing Neighbourhood Plan has recognised the sensitivity of sites and their importance thus designating them as Local Green Spaces. They carry on by explaining their reasoning. "..... by eroding the open rural feel that forms an important component of its special character The proposed development would destroy the remaining sense of openness and views into the countryside." Historic England's comments show that the policies STEB1; STEB4; and

indeed, STEB7 are more than valid reasons that this application is contrary to the **SNP** and therefore should be refused..

2.4 Important Open Gaps STEB6 *(Page 44 SNP)*

These two fields subject to this application are an important open gap in the core of the village, and should this application be approved it would create an urban feel which SPC believe will form an incongruous looking sprawl of dwellings jutting into the fields and verdant countryside beyond, effectively resulting in 'back land' development on the West side of the High Street in the core of the village. SPC believe this application is contrary to this policy and would effectively coalesce the core of the village from Mill Lane Field with Bran End and the Downs. Stebbing is a linear village, and its open gaps are a reminder which gives connectivity and a sense of place to residents. Even with the primary school on the opposite side of the road (Eastern side of the High Street) is well set back, which provides an open view up to Virom Island and both fields. Therefore, this area of the High Street leading onto the Downs is tranquil, very open and obviously both fields form a Gap between the built-up areas of the High Street and beyond.

2.5 STEB7: Important & Protected Views *(Page 44 SNP)*

Stebbing Parish Council does not believe that the application with all its proposals, is in any way sympathetic or necessary to the local character including landscape settings, that respect the views both looking towards the Downs from the 'Mount' (Motte); views from the Downs towards the 'Mount' and from the Downs towards Stebbing Park. The views are open, agrarian, and valued greatly by residents as stated previously. As part of the preparation of the **SNP** an independent Landscape Sensitivity & Capacity Analysis was carried out to inform preparation of Plan Policies This application adversely affects and will harm these important and protected views much valued by residents.

The application has not considered any of the findings of the Analysis of these two fields and their Capacity for development in the Landscape Sensitivity and Capacity Analysis / assessment The assessment and analysis of Parcel 37 (both fields) was carried out and it considered the following views:

- from The Downs
- from the High Street
- into the High Street and its linear medieval form
- beyond the High Street, as represented by the views of the Parish Church, St Mary's the Virgin and its tower with spire
- from the three PROWs within the **Sites**
- from viewpoints on the western side of Stebbing Brook valley

The Landscape and Capacity Assessment concluded that both fields within Parcel 37 with Low Landscape Capacity. Any development within the parcel would:

"..... have significant adverse effects on the historic integrity of the village and development, the settings of Listed Buildings, and/or the attractive views and vistas that are available from points within the village".

There is a value in the openness and tranquillity of the relationship to the open countryside that is valued by residents. It is care of their mental well-being that is cared for in these important and protected views this is a space that is valued amongst our other designated spaces for its differences because it alters little apart from the seasons. Therefore, as with **STEB4** this supports NPPF paragraph 7(a)(b)(c) and so for this application it shows the importance of these two fields.

The three PRoWs that traverse the two fields are perhaps the most sensitive points from which to assess visual impacts. Given the way each PRoW threads its way through the sites, the impacts of development would be very considerable on these receptors. Mitigation in the form of boundary treatment and other planting within the plots could not alter the extent of such impacts, even after 15 years as can be seen in the applicant's visual impressions.

Both fields in this application are unimproved permanent pasture and grazing land, those very qualities make them the more remarkable and important in both visual and ecological terms for a local area such as Stebbing which is dominated by intensive arable production of combinable crops in very large fields. They are the only examples of farmland use of that type in Stebbing. The significance and rarity of grazing land along the length of the valley form, being traversed by PRoWs, is quite remarkable further for its ease of accessibility from the core of the village.

The village school opposite, which, if permission is given will deprive the pupils of a setting of rural agricultural Uttlesford and instead present an urbanised setting. The proposal states there will be a car park opposite the school with its entrance which appears to be cut through the yellow hatched lines for no parking on both sides of the road. The increased risk this would pose, shows the inconsiderate nature of the application.

The value as Local Green Space is intrinsic therefore this application is contrary to **STEB4** as the enhancements offered for it completely misunderstand the value of these two fields as Local Green Spaces as compared to the Stebbing's other designated other Local Green Spaces.

SPC is greatly concerned that if this application is approved, the negative impact of the cumulative effect of all the dwellings not only as stated above but also exacerbating by

- lighting from the car park, dwellings and development lighting will create unacceptable and damaging light pollution in what is a dark natural open space. The village low level street lighting (supplied by the parish council) is approximately 150m apart being the only lighting there apart from a little from the properties opposite. This development will create damaging light pollution where there have been dark skies.
- Whilst SPC supports sustainable design etc our concern about noise pollution from air source heat pumps, where previously there has been only that of nature. Should this application be successful SPC would request a condition for type of pump and where to be sited on each property.

These two concerns relate to the whole application site causing harm to this very valued Local Green Space its landscape and protected views, damaging irrevocably the historical setting, with dwellings that are incongruous in the setting as they appear in the applicant's Section 62a Views Study dated 27/2/25

2.6 STEB9.2 Development within the Countryside (Page 56 SNP)

This policy allies itself with **S7** amongst others of the Uttlesford Local Plan 2005 (ULP) which is partially compliant when this policy was in SNP and found sound by the inspector to meet requirements of the NPPF, legislation and guidance. This is the same at present. The two fields in the application site are within the countryside and outside of the Development Limits, therefore this application does not comply with this Policy

This is not infilling of a small gap, nor is it in keeping with the character of the area, its surroundings and has much impact on the countryside both looking out of the village and looking into from the three PRoW that cross the application site.

The construction we do not believe is of exceptional quality and for this application site and does not conform with or meet either of the criteria in NPPF 84e. **Please note** the Parish Council is actively

starting the process of fulfilling the ULP requirement for 109 dwellings. We are also supportive of sustainable dwellings but in an appropriate place, and design within the parish.

2.6 Special Circumstances

The applicant must show that they have proven very special circumstances of the need for dwellings in local Green Spaces. Stebbing Parish Council does not accept or agree that this application does fulfil that need or that what they are offering will create 'very special circumstances.' The fact that the applicant wishes to 'activate' the space in this LGS is incongruous to us.

We suggest that the overall planning balance is overwhelmingly against support for the proposals in Section 10.9 of the applicant's planning statement as shown above by the Parish Council. **SPC** rejects this premise and would suggest that NPPF paragraph 11.d) I as described in footnote 7 applies and that this application should be refused.

3.0 Misdirection's and Concerns

SPC has major concerns about the misdirection and perhaps even a slight of hand as we cannot understand or see the evidence of how they will achieve all they maintain they offer in this application.

3.1 Stebbing's Local Green Spaces +

SPC does not agree with the applicants *"..... Quantitative and qualitative improvements to the LGS facilitated by the application proposals would make an entirely positive contribution to the 'special' character of the land and increase its significance from a local perspective, particularly in terms of its resultant recreational value and the exceptional biodiversity gains delivered, whilst acknowledging local heritage assets."* (Paragraph 7.3 pg 10 planning statement)

As stated in paragraph 2.3 our **LGS policy STEB4** is compliant with NPPF paragraphs 106 and 107 and these two fields with their PRowS crossing them are valued for themselves, their beauty, tranquillity, wildlife, flora and fauna as well as the knowledge of the uninterrupted views and heritage setting. However, **not** as being offered and seen by the applicant to appease and obfuscate its way into success. Stebbing has many designated Local green Spaces that fulfil the needs of the community.

3.2 Our Neighbourhood Plan has five more designated LGS, an allotment and SPC owns Stebbing Green which was first identified as a Local Wildlife Site in 1994 by Essex Wildlife Trust, this citation was ratified by Essex County Council in 2021. *(Stebbing Green Management Plan October 2024 attached)*

LGS/ Recreational/sports facilities	Acreage	Usage	Ownership
Mill Lane Field	6.2 acres	Stebbing Cricket Club & Pavillion; children's play area /equipment; general recreation; Kingdom Woodland Walk with dipping pond Village events e.g. Annual Village Fete	Stebbing Parish Council

Alcott Field	3.5 acres	Football Club Children's Play Area/Equipment	SPC
Pulford Field	1.4 acres	Junior football training Children's Play Area Equipment incl. Zipwire	SPC
Allotments	0.6 acres	Available to residents for a nominal annual rent	SPC long term lease
Wildflower Meadow	8.7 acres	Open Access for residents	Stebbing Village Hall Trustees (Rodowski Bequest)
Stebbing Green	12.5 acres	Open Access for Residents	SPC (LoWS Ufd280)
Stebbing Tennis Club		Local Membership	Tennis Club
Bowls Club		Local membership	Bowls Club
LGS/ Recreational/sports facilities	Acreage	Usage	Ownership
Green Open Space bottom of Marshalls Piece		Open Access for Residents	UDC (leased via S106 for 99years)

As can be seen from the table above there is a great deal of outdoor sport and recreation space for residents to access within Stebbing, mostly provided by SPC or the community itself, therefore, the two fields in this application have no need to be enhanced for community benefit but left as the reason for the designation specific to them. Therefore, without justification for the enhancement of the local green space this application is contrary to our neighbourhood plan

It should be noted that there is a wide network of PRow and Byways around the village and Parish giving residents access to the countryside, nature, and all the benefits that abound from this. Residents can walk (should they wish e.g. into Great Dunmow or perhaps to Bardfield and links all around the village. Helping encourage and facilitate 'active travel' SPC has offered a free map with PRow found in the village shop and walks can be found on the parish council website (<https://stebbing-pc.gov.uk/village-life/village-walks>). The village has a P3 group which maintains and repairs the PRow lead by Mr Brian Martin and the rest of his volunteer team. Therefore, residents are encouraged with all that is available to them around our Parish to explore and enjoy the countryside, nature, and their health and mental well-being.

3.3 Viability and Concerns

The applicant makes much of all, that their application will be of benefit to our community, but SPC is greatly concerned about the viability of elements of it. The parish council is obviously very aware of the costs of maintaining recreation fields, playing fields and especially Stebbing Green. Our concerns come from reading the 'Unilateral Undertaking' and what the applicant has proposed. They state that there will be a management company formed to presumably oversee the management of the public space around all the properties; to manage and maintain the car park; ongoing management and maintenance of all the green open space and the very important SUDS. Our concern is for our very valued fields designated as LGS and how they will be treated should this application be successful.

3.3.1 SPC are concerned that the 28 properties (14 of which are affordable) residents will:

- a) be able to adequately fund through a Management Company ongoing successful maintenance of both fields and SUDS for the development

- b) feel resentful that they are paying for the other residents of Stebbing to access and use the two fields.
- c) all twenty-eight properties be responsible for the management and maintenance of the car park, if not who? Would it just be the 14 affordable dwellings? This would seem decidedly unfair to them.

3.3.2 The parish council is also concerned that with the rising costs across the board and especially in building costs and the drop in sales in the housing market that this may affect the viability especially with all that is being either offered by or being asked of the applicant e.g. by Highways, Education etc. It has not been made clear if a Registered House Provider has agreed to take the 14 properties yet. Therefore, we would ask that the viability of providing 14 affordable properties as 50% of the total along with everything else that is on offer in the application is proven to the Inspector if possible. The Parish Council would welcome this if possible.

3.3.3. The parish council also have a concern and an objection to the following if this is something that will be required if this application is successful. In the previous application there was a suggestion that either a 'Pelican or a Zebra Crossing' was required on the High St. This would add an urbanising effect with this type of street furniture on the edge of the Conservation Area. In looking down the High St from the high viewpoint on the corner of Virom Island this would change the gateway view of the conservation area to its detriment. We wish to be consulted on what is considered an intrusive mitigation element of an undesirable application in conflict with the **SNP**

Stebbing Parish Council would like the opportunity without prejudice to participate in any round table discussion of the S106 should this application be approved.

4.0 Conclusion

We are not Nimbys and as already stated we as a parish council are more than prepared to allocate dwellings from the ULP. This was shown in the made SNP of July 2022 (<https://stebbing-pc.gov.uk/parish-council/stebbing-neighbourhood-plan/plans-documents/neighbourhood-plan-referendum-version/viewdocument> pages 73-80)

However time has moved on and although the emerging Local Plan goes to inspection in June this year we understand that this now holds minimum weight. The applicant makes much of the fact that the present **SNP** allocation is too small according to them, it is not, as it is relevant to our made up to date **SNP**. Time does move on and **SPC** as stated previously is being proactive by

1. Accepting and agreeing to the allocation of 109 dwellings within the emerging ULP
2. Supporting the reformation of SNPSG actions and recommendations to include (residents survey, housing needs survey, call for sites etc)

The applicant has shown scant regard for the Stebbing Neighbourhood Plan and the resident's wishes in their democratically voted decision by bringing forward this most unwelcome application. **SPC** having regard of our Neighbourhood Plan, our many residents that have objected to this we respectfully request that this application be refused.

Stebbing Parish Council Comments – Document List
S62a/2025/0077 – Land West of High Street, Stebbing
UTT/25/0151/PINS

Website

<https://stebbing-pc.gov.uk/parish-council/stebbing-neighbourhood-plan/plans-documents>

Neighbourhood Plan

<https://stebbing-pc.gov.uk/parish-council/stebbing-neighbourhood-plan/plans-documents/neighbourhood-plan-referendum-version/viewdocument>

Landscape Appraisal

<https://stebbing-pc.gov.uk/parish-council/stebbing-neighbourhood-plan/plans-documents/landscape-appraisal/viewdocument>

Stebbing Neighbourhood Plan – Examiners Report

https://www.uttlesford.gov.uk/media/11296/Examiner-s-report-on-the-Stebbing-Neighbourhood-Development-Plan-2019-2033/pdf/Examiner_Report_UDC_StebbingNDPA.pdf?m=1683902787263

Stebbing Walks PRoWs

<https://stebbing-pc.gov.uk/village-life/village-walks>

Uttlesford District Council –

<https://www.uttlesford.gov.uk/stebbingnp>