S62A/2025/0077 – Land West of High Street, Stebbing

Further to my representation objecting to the above application (email dated 10-Mar-2025), I wish to make additional points of objection particularly given some recent documents submitted by the Applicant,

- 1. <u>Montare justifies approval of the Application suggesting benefits due the proposed 'activation'</u> <u>of the Local Green Space (LGS) and increased community access to the LGS. These</u> <u>justifications are misleading and greatly overstate the community benefits, consequently they</u> <u>should be given a much lower priority in decision making.</u>
 - The Stebbing Neighbourhood Plan (SNP) designates the 2 parcels of land as LGS because of their importance to the Stebbing community who greatly value the LGS in its current form because it:-

i) has inherent beauty and tranquillity,

ii) has a richness and diversity in wild life,

iii) is historic in nature (ancient pastureland, former deer park of the Stebbing Park Estate and key to the setting of an ancient castle motte and the Grade II* Stebbing Park),

iv) is open space that is highly characteristic of our historic villages evolution and location along the Stebbing Brook valley,

v) provides an important village amenity via Public Rights of Way (PRoW) that connects the village along its length from Church End to Bran End and links to the wider countryside beyond via the PRoW network,

vi) serves the community well, being in close proximity to the village and is not extensive in size.

 The term 'activation of the LGS' is nonsense - the proposal offers little additional benefit to residents who currently enjoy the LGS in <u>its current form</u>. The 'activation' proposed by is mainly aimed at i) attempting to tilt planning review in favour of approval and ii) making the development more attractive to potential buyers to secure a higher selling price.

<u>The proposed development will have a marked detrimental effect on the LGS</u>, urbanise it and make it more akin to a mini holiday park – additional footways, an events area, green gym, play area, forest school, wet woodland, composting facility, heritage orchard and information signs are proposed. Much of <u>this 'urban parkland' is not in keeping with our rural and historic village and our SNP designated LGS</u>.

- The North Field is in a flood risk zone and both fields have natural springs running through them so the land very wet; anyone who uses any of the PRoWs regularly knows this well. The proposed pathways will be mown grassland, which during prolonged wet (but not excessive) weather will become very muddy, slippy and uneven; <u>the wet woodland and forest school pathways due to their location in the high risk zone will either flood or become so wet and muddy they will be unusable.</u> Montare's proposed mitigation strategy will unlikely prevent this, as it is inherent to the geology of the area. Consequently access to these parts of the 'activated' LGS will be substantially reduced, sometimes for a prolonged period during poor weather (except to the more hardened user), such that the <u>implied greater access and community benefit will be lost and be very similar to that currently provided by the existing PRoWs</u>.
- The pathways particularly from the housing plots/car park may become routes for teenage cyclists racing downhill and posing a potential hazard to pedestrians. Note: the 3 <u>PRoWs</u> <u>are designated footpaths and should only be used for walking</u> and not cycling, how will this be ensured given that all the new footways link to them?
- **The suggested** <u>community events area is not required</u> as the Mill Lane ground a short distance away is eminently more suitable (see original objections).
- The <u>playground is small and offers limited additional benefits</u>; the Mill Lane ground is within close walking distance via PRoW#10 and has a much larger playground with flat land for running/playing ball games (see original objections).
- The <u>forest school and wet woodland are not additional benefits</u> to the community; Stebbing Primary School already has a forest school ethos and access to private meadows for educational needs. There is already a woodland walk (away from the flood risk zone) on the edge of the Mill Lane ground (see original objections).

- The <u>composting facility is not an additional benefit</u> to the community. Located in the southwest corner of the North Field adjacent to PRoW#12, it will very likely become an <u>eyesore</u>, <u>smelly and attract vermin</u> if not well maintained, as well as a dumping ground for unsuitable garden waste (e.g. large tree branches). How will this be policed and composting managed? Due to its location the facility is only accessed indirectly via PRoW#10 from Plots C and D, so is very <u>unlikely to be used by the majority of houses</u>.

<u>The village already has green waste collection</u> provided by the Parish Council so a composting facility is not needed by the community. This is provided free of charge, every Sunday from March to November and resides at the entrance to Mount Fields a short distance away.

- Who will manage and pay for the maintenance of the 'activated' LGS? Currently the LGS costs the community very little to maintain as a small number of volunteers maintain the PRoWs on behalf of the Parish Council through the Parish Paths Partnership with support from Essex Highways. If the new house owners have to pay for the 'activated' LGS upkeep and maintenance (landscape plan suggests this could be a significant cost), will they object to villagers using the facilities? How will the cost be distributed given the high proportion of affordable/low cost houses (56%) whose income may be limited?
- Montare estimates the LGS access will increase to 84.7%. <u>This is a simplified overestimate</u> <u>and is misleading as it does not account for inaccessible land</u> such as scrubland, swales, waterlogged land (eg wet woodland, forest school), ponds, streams and land set aside for nature.
 - The estimate provided by Montare is based on the full land area minus the area allocated for plots A-D including car park. This simplistic approach assumes full accessibility to ALL of the LGS which will not be the case, particularly during wet weather particularly when it is prolonged. For example the wet woodland and forest school will be accessible ONLY by footways running through them and only when not waterlogged; the area of scrubland will not be accessible. Thus the accessibility is overestimated and biased when compared to the current LGS access based on the PRoWs only. If for example scrubland is included by because of 'visual access' then to avoid bias, the same approach should be undertaken for current access to the LGS.
 - One only needs to visit the LGS to realise that the public currently walks off the PRoW (rightly or wrongly); several footpaths around the LGS are evident and can been seen in aerial shots and other photos provided by ______. As the land is not used in any way by the current landowner, locals make most of the amenity they enjoy so much, much of this probably arose during COVID lockdown and residents have continued to this day. Perhaps if this unofficial access is considered the difference with ______84% would be much less? Despite this unofficial public use the landowner has not granted permissive paths but has instead put up signs on the main gate to the South Field stating no Public Access very community spirited!
- 2. <u>The Views Study submitted by the selective and misleading; it does not represent the true impact that the proposed development will have on the views on the Downs/High Street and from the PRoWs across the LGS. Such an analysis also does not take into account the importance or benefits of this LGS to the Stebbing community.</u>
 - A photo can never truly reflect what an individual sees or experiences on the Downs/ High Street or on the affected PRoWs across the LGS. *A photo represents a single location and direction both chosen by the taker*. Via selection part of the view can be omitted or distance implied or features and landscape flattened/minimised.
 - The only real assessment of how the views might be impacted is by personal experience of the LGS (as for residents and visitors), by walking, cycling or driving through/past it. This results in a continuum of changing views in several directions but has the additional benefits of enjoying the LGS, a sense of tranquillity and enhanced well being. Only then can one truly appreciate what will be lost to residents and visitors if application is approved.
 - Views Study provides 6 views many of which have been carefully selected to lessen the impact of the proposed development; very few of the views that would be severely impacted have been assessed.

View 1 in a neighbouring field on PRoW #12 looking east towards the Downs and the North Field.

- The use of a wide angle lens increases the foreground, flattens the landscape and minimises the rolling nature of the Stebbing Brook valley; it does not truly reflect what the individual sees i.e. a lovely view of the approach to Stebbing from the countryside that is worth preserving.
- The Study shows that the proposed houses (Plots A&B) will dominate the landscape from a distance along the Downs and fill the LGS to the tree line, but the impact is minimised by flattening the landscape and attempting to reduce the apparent height of the new houses.
- Notably, the landscaping proposal for the wet woodland in the North Field removes 40 existing tall willows, replacing 12 with wetland species and pollarding an additional 31, thus removing height and thickness taking many more years to mature. This was unlikely considered in the Study therefore giving a false impression in this specific view.

<u>View 2 in the North Field at the most northerly point where #10 PRoW enters, looking up towards the Downs.</u>

- This clearly demonstrates the proposed houses in Plots A&B dominating the skyline (to a much greater extent than current houses on the Downs), due to their height and setting on higher ground.
- By selecting this location the Study implies the visual impact may be lessened by the proposed tree planting by year 10. This is <u>very misleading</u> since no views further along the PRoW were chosen; these would clearly show the marked negative impact of the new houses on the LGS.
- PRoW#10 runs up the hill beyond the trees and closer to the proposed houses, passing beside Plot B boundary. From these alternative locations *ALL the new houses will be clearly visible and will be very prominent* in the landscape because of their position, height and design; *hedges and shrubs will not hide them.*

View 3 in the South Field from PRoW#21 looking towards the Downs/High Street.

- This clearly shows that the proposed houses in *Plot D will dominate the landscape* and will not be hidden by hedges or trees.
- The view does not assess what will be seen to the left, *namely the 3 large self-builds in Plot C filling the width of the LGS*.
- *In view 3 the proposed car cark is empty!* Cars of various common colours (eg red, white, blue) parked here will have a negative impact on the view.

View 4 along the Downs looking southwards with the North Field on the right.

- This *selective view is taken from a location to imply minimal visual impact of the development* on the North Field on the approach along the Downs.
- A short distance further along the Downs ALL the houses in Plots A&B will be clearly evident and will dominate due to their size and design.
- All the views across and beyond the current hedgerow over the LGS will be lost or negatively impacted forever.
- Why were such views not included in the Study?

View 5 from the High Street/Downs looking across to the South Field

- This is the <u>only</u> view across the Downs or High Street looking westwards over the LGS. Why was a similar roadside assessment not done elsewhere eg for the large 4 bed homes in the North Field?
- This selective view focuses mainly on the proposed 1 bed homes in Plot D, which sit mostly below road level, so appearing to have low visual impact
- The oblique angle of the view towards Plot C also *minimises the impact of the 3 large self-builds*.
- It is also selective in its location as it does not assess views a short distance either side e.g. i) along the Downs at the public seat across from the proposed 3 large self builds in Plot C or ii) along the High Street closer to the school across to the entrance to the proposed car park and Plot D. Why?

View 6 along the High Street looking north with the South Field on the left.

- This **selective view uses existing houses to hide much of the proposed development** on the LGS.

- It does show that the side of the single bed homes will *dominate this location*, despite being less prominent at the front (view 5).
- This view is *selective in its location* as it does not assess views further along the High Street, e.g.
 i) at the *current gate into the LGS* or ii) across from the school towards the car park and the houses in Plot B which sit both on the High Street but also behind within the LGS itself?
- Notably, the Study has not assessed the impact the proposed development on ANY of the SNP designated 4 important and protected views (STEB7 views 4,5,6,7), but has selected those that are most favourable to support the application.
 - The most notable STEB7 views **omitted in the Study** are view 5 (The Downs towards Stebbing Park) view 6 (Downs towards the Mount) and view 7 (Downs to Stebbing Brook valley and Hicks plantation); **ALL would all be detrimentally impacted by the proposed development and lost forever.**
 - Mastersite plans of the two fields show 1 view on each, each of *these views will be narrow, looking between properties, across hedges/gardens and playgrounds, with a suggested view of the motte (ie not STEB view 6) blocked by new tree planting.*
 - There are no views shown on the Mastersite plans that equate exactly to STEB view 6 or view 7, *highlighting that they have not been protected*.
 - Why were these views not assessed in the Study?
- The PRoWs (# 10, 12 and 21) crossing the designated LGS have wonderful views across the landscape looking both <u>along</u> the paths, as well as from various aspects from the west looking eastwards approaching into Stebbing. As noted the Study is selective in the analysis points and avoids views that highlight the major impact that the proposed development will have on the views from the PRoWs. Two that are omitted are described below.
- - i. <u>A key view in the South Field that will be severely impacted by the proposed houses is also on</u> <u>PROW#10 looking across towards the Downs/High Street as it enters the LGS from Stebbing</u> <u>Park entrance.</u>
 - Currently due to existing trees much of the Downs is mostly hidden, it's a very tranquil and lovely spot, with the village school dating from 1870 just seen in the distance.
 - Plot C with its 3 large self-builds will fill the entire corner of the LGS and a hedge boundary will encase the PRoW (for privacy for new residents), but will not hide the dominating properties located behind the hedge on higher land.
 - Further over the houses on *Plot D will fill a large part of the view* and obscure the village school.
 - Although the view from the PRoW to the right towards the Motte and Stebbing Park will technically be unchanged, the setting of these 2 important historic landmarks will be significantly diminished and trivialised because of the dominance and closeness of Plot A and the 'amenities' in the field (children's play area, green gym).
 - ii. <u>A key view in the North Field that will be severely impacted by the proposed houses is on</u> <u>PRoW#10 looking north after it enters the LGS from the Stebbing Park entrance.</u>
 - Currently at this location very few houses on the Downs are evident (except Falcons which is located up to the right). This is a wonderful tranquil PRoW view across ancient pastureland running along the edge of Stebbing, which ultimately lead to walks beyond the village itself.
 - Plot B's 5 large houses will sit around Falcons with PRoW#10 running close to its boundary, whilst the Plot A's 6 large houses will be very evident on the far side of the LGS.
 - The development will detrimentally impact this beautiful, historic landscape and its views forever, yet no analysis of this location has been performed by Why not?
- Finally please note that the Views Study maps incorrectly show PRoW #12 running outside the North Field, down the Stebbing Park drive to Stebbing Brook. Please refer to the definitive map

located in supporting documents, PRoW #12 enters the North Field at the same location as PRoW#10 via a gate near the entrance to Stebbing Park; it runs within the North Field down to Stebbing Brook.

- 3. The benefits of the community car park opposite the school proposed by are overstated and the design is not fit for purpose. The provided has not thoroughly assessed the safety issues or practicalities of the car park for use by families with young children during an acute time period of the school run. The period main focus is to maximise the number of spaces to claim community 'benefit' to secure approval. The car park layout requires significant redesign and simplification resulting in substantially fewer spaces and reduction in the claimed benefit. Additionally the car park requires a pedestrian crossing for safety and will concentrate the current car numbers into a more concentrated area vastly increasing congestion in an already badly congested and potentially dangerous area for pedestrians and road users alike. It offers NO benefit to the community.
 - The proposed car park has nominally 23 spaces for community parking with the suggested 'benefit' that it will help alleviate roadside parking on the High Street/Downs during the school drop-off/collection times. *However 4 of these are dedicated Blue Badge spaces.*
 - Stebbing Primary school and its Montessori Nursery cater for young children who need help getting into/ buckling up for safety by parents/carers. *This requires extra wide 'family' style spaces or parking locations such as the High Street/Downs with adjacent pavements* to open car doors safely.
 - Please use the car park plan to follow the discussion below.
 - i. The remaining **19** non-Blue Badge spaces are standard width so not suitable for getting young children in/out of a car. Ideally ALL the spaces should be wide 'family' type to be suitable for the school run; this will reduce the overall number of spaces available.
 - ii. Young children will walk to/from school with many parents/carers also having pre-school aged children possibly in buggies. The proposed plan shows pavement from the High Street and along the shared road within Plot D; critically there is no boundary pavement on the southern side of the car park to reach the back row of 12 spaces (including the 4 Blue Badge spaces). The absence of pavement will require pedestrians to walk through the car park itself or between the front row of parked cars (which may not be possible with buggies/open doors), to access the back row spaces. This is a safety risk particularly given that cars may also be entering/leaving the car park at the same time. Incorporating a pavement on the boundary to allow pedestrians to safely walk to their cars needs significant redesign that will result in a further reduction of available spaces.

iii. The car park is served by a *single entrance from the High Street and also a single entrance from the shared road within Plot B.* The latter entrance *located in the middle of the car park necessitates pedestrians to cross it to get to the second pavement.* There will also be instances where drivers enter *to find the car park already full*, necessitating turning/reversing to exit. How are 19-23 cars going to safely and easily enter, park and manoeuvre out of the spaces and exit the car park whilst there are adults and children also trying to walk to their cars?

Also queues within the car park and backing up from the High Street exit will form, leading to significant frustration and potentially accidents.

Together these highlight major safety and practical issues that have been completely overlooked in the proposed car park size and layout.

It is highly likely that some parents/carers will try the car park 1 or 2 times then *revert for safety and congestion reasons to their previous parking* habit on the Downs/High Street.

- iv. Walking along the Downs/High Street during the school run highlights that a significant proportion (about third) of the vehicles used by parents/carers are large family cars, SUVs or people carriers that do not fit standard spaces in the proposed car park. Unless the car park entrance and turning spaces are significantly increased these larger cars will be not use the car park. This redesign requirement will also necessitate a reduction on the number of available spaces.
- v. In its Sept 2023 planning statement (see section 8.4) estimated that 35-40 cars may be parked on the Downs and suggested that the proposed car park could reduce this and mitigate some of the traffic concerns and hazards particularly on the blind bend at Stebbing Park

entrance. However, this assumption overlooks that cars also park on the Downs opposite the North Field, the Downs/Mount Fields and often on both sides of the High Street (opposite the school, past the shop and beyond the White Hart Pub).

A resident count at all these locations performed in early April 2025 during the Thursday/Friday afternoon school run found the **number is 60-70 cars**!

The proposed car park can only work on a first-come first-served basis and cannot be assumed effective at targeting parking from a specific area to alleviate hazards associated with the proposed development.

It is more likely that use of the car park will result in the distant parkers (e.g. on the Downs opposite the North Field and on the High Street beyond the White Hart), parking closer to the school resulting in a greater concentration of the same number of cars as current but in a smaller more concentrated location, increasing congestion in the critical area around the school.

It is very likely cars will still remain on the Downs, close to the blind bend at Stebbing Park as often the drivers who use this part of the Downs are late arrivals who would not get into the car park.

- vi. The Essex Highways requested zebra crossing (or similar) placed in the vicinity of the school for pedestrian safety will require additional parking restrictions on the High Street to ensure visibility of pedestrians for road users. It will also increase congestion in the area; traffic queues and grid lock currently occurs in front of the school and on the High Street at the shop without the proposed car park and zebra crossing. The proposed car park will ensure grid lock is a daily occurrence and road rage an every day event. Ultimately the car park will be of NO benefit to residents or parents/carers of the school, it will make our village a nightmare!
- vii. In their Sept 2023 planning statement (see section 8.4) propose that 'off'site' parking could be provided to the school by minor modification to the school entrance accomodating up to 24 spaces within its frontage. *This proposal highlights the lack of consultation with the school and a desire to offer any 'benefit' to secure approval.* The school frontage *is already a car park used by school and nursery staff*, it has a 'Staff Only Parking' sign at the gate and is always full with staff cars. *Thus the suggestion of off-site car park is a false offer of 'benefit'.*

In conclusion, I continue to strongly object to this Planning Application. In addition to my previous comments emailed 10-Mar-2025, I believe the community benefits (activated LGS, greater LGS access, community car park etc) suggested by are over stated in order to secure planning approval.

The proposed car park layout is not fit for purpose being designed to maximise the number of spaces, rather than give due consideration to safety and the practicalities necessary for a car park that will be predominately used during the school run at Stebbing Primary School and its Montessori Nursery. The necessary redesign will significantly reduce the number of spaces. Its location will concentrate the already large number of parked cars into a smaller area, significantly worsening an already highly congested area, increasing the safety risks to pedestrians and road users alike. It therefore offers no benefit to the community.

The Views Study recently submitted by **selective** is misleading and highly selective in an attempt to imply a lower visual impact of the development than is truly the case. The SNP important and protected views have been largely ignored and several key locations that should have been assessed are missing.

Please consider these comments to appreciate why I and so many Stebbing residents want to see this the Application rejected. Thank you.