



Uttlesford Local Plan 2021-2041

Regulation 19 Publication Stage Representation Form

Your information

How we handle your information

Information you provide will be treated in accordance with the General Data Protection Regulation (GDPR) (EU) 2016/679. Your contact details will be used solely for the purpose of contacting you about your consultation response. You should refer to our Planning Policy Privacy Notice for an explanation as to what we do with your personal information, how long we keep it and your right to withdraw your consent at any time you choose.

Please note that it is a requirement of the Local Plan process that comments can only be accepted if they are received in writing (online, via email or via post). Comments made verbally or anonymously cannot be accepted, including those made at public exhibitions.

The Council is obliged to make all representations available for public inspection on its website.

The consultation runs from Thursday 8th August 2024 to Thursday 3rd October.

Please return your consultation form:

Planning Policy
Uttlesford District Council
London Road
Saffron Walden
CB11 4ER

Telephone: 01799 510510

Email: localplan@uttlesford.gov.uk

This form has two parts:

Part A – Personal Details: need only be completed once.

Part B – Your representation(s). Please fill in a separate sheet for each representation you wish to make on individual chapters, evidence, maps or policies.

We recommend using the online survey form available at <https://www.uttlesford.gov.uk/reg-19-consultation> when responding to this consultation.

Part A – Personal Details

1. Personal Details*

**If an agent is appointed, please complete only the Title, Name and Organisation (if applicable) boxes below but complete the full contact details of the agent in 2.*

2. Agent's Details (if applicable)

Title

Takeley Street Residents
Group - Committee

First Name

Last Name

Job Title

(where relevant)

Organisation

(where relevant)

Address Line 1

Line 2

Line 3

Line 4

Post Code

Telephone Number

E-mail Address

(where relevant)

Part B - Please use a separate sheet for each representation

3. Please indicate which chapter, policy, map or evidence document you want to comment on in the box below.

All Policies for South Uttlesford.

This submission overall deals with 6 themes attached as separate documents

Document A Sustainability

Document B Employment Part 1 of 2

Document B Employment Part 2 of 2

Document C Transport

Document D Flitch Way

Document E CPZ

Document F Alternatives

Each document header specifies which policies and/or chapters are commented upon. Changes required are specified in each of the 7 additional Documents

4. Do you consider the Local Plan to be (please put a cross in the relevant box):

	Yes	No
4(a). Legally Compliant		
4(b). Sound		X
4(c). Compliant with the duty to co-operate		

5. Please give details of why you consider the Local Plan is not legally compliant or is unsound or fails to comply with the duty to co-operate. Please be as precise as possible.

If you wish to support the legal compliance or soundness of the Local Plan or its compliance with the duty to co-operate, please also use this box to set out your comments.

Introduction

We believe the plan to be unsound. This conclusion is driven by the inadequate evidence base. (Procedure Guide for Local Plan Paras 1.10, 1.11 – “What is an adequate evidence base”, together with a catalogue of errors within the documentation.

1 The plan has numerous inaccuracies, is misleading or critical data difficult to find eg:

- According to the 'Uttlesford Transport Study, TN 320 – Trip Generation document' there will be 1,773 expected OGV movements per day at the Takeley 005EMP site.
- The existing Northside approval UTT/22/0434/OP for 61.86ha of employment use including B8 and B2 has been misrepresented. Figure 1.1 'A120 Modal Outputs Study (June 24)' - only 174,000sqm (17.4ha) are shown on the map.
- The 'A120 Corridor Study Revised Development Scenario (March 2024)' only highlights 19'500sqm (1.9ha) of committed employment at Northside and not the 61.86ha with Planning consent.
- Part of the landlocked, safeguarded land (North of Airport balancing ponds) safeguarded for transport use (A120 Access) is within the current and proposed CPZ. Parts of the site are identified as within an area at high risk of flooding with “*potential for loss of life*”. See Chapter 14 of the National Planning Policy Framework (NPPF), paragraphs 167 to 173; Our attached Document C on Transport; Reg 19 evidence Level R2 Strategic Flood Risk Assessment Appendix A pages 96-104.
- The Flitch Way has been repeatedly misrepresented as providing direct linkage to Bishops Stortford eg “*Flitch Way - a 15-mile recreational route following the former railway line from Braintree to Bishops Stortford*” when in fact it stops in Uttlesford, short of the M11 roundabout.
- Local Plan pg29 (bottom right page number) para 2.4.3 states “*helping to ensure that congestion is addressed, particularly at Junction 8 of the M11 and on the A120 when there are no plans by Highways to do so.* (See our additional attachment Ref2 Essex FOI)

2 Critical documents are missing. Some examples are:

Local Plan Pg99 (footnote 55) refers to 'The Flitch Way Links Study'. There is a draft document at Reg 18 but no document at Reg 19. The Sustainability Appraisal July 2024 para 5.4.57 also refers to the Flitch Way Links Study being completed in 2023 with a link– However the link simply directs you to the 'draft' document within the Reg 18 evidence.

- Local Plan Pg195 (footnote 136) refers to 'Footprint Ecology, Habitat Regulations Assessment, 2023, Available online: <https://www.uttlesford.gov.uk/reg-19-evidence>' This does not exist at Reg 19. The Habitat Regulations Assessment Reg 19 is dated June 2024 and referenced by AECOM.
- Policy 10b referenced in the Habitat Regulations Assessment p.45. There is no policy 10b at Reg 19.

3 Some evidence is out of date, examples are:

- Transport data is based on a Covid Lockdown year 2020/2021, even going so far as to call it realistic. According to data from Stansted Airport "*2020 was greatly impacted by the COVID-19 pandemic, which led to a 57% reduction in annual movements*". Those air traffic movements would have impacted on vehicle movements in the local area.
- The Employment Land Review "*builds on 2011 findings*", quotes a 2016 review and finally claims that a 2017 report is the most up to date.
- The Labour Supply statistics in the same report are based on a 2012 study, "tweaking" them in 2017

4 From reading the plan, we are not clear that alternatives have been properly considered eg (See our Document F Alternatives and our additional attachment Ref1 Threadneedle submission)

5 The plan is dependent upon a significant amount of "Safeguarded Land". Much of this land is owned by third parties (some of whom have indicated that they are not willing to part with the land) and it cannot be safeguarded.

This includes:

- Airport owned land including some needed for essential cycleways
- Airport owned roads and roundabouts such as Coopers End and Bassingbourn
- Flitch Way access land
- Bigods lane (Gt Dunmow)

Without large swathes of that land being made available and purchased in a timely manner, the plan will not work and is unsustainable.

Time constraints have limited our attention to South Uttlesford where we have substantial local knowledge.

The following documents are attached.

There are seven documents related to this three page overview. These are:

Document A Sustainability
Document B Employment Part 1 of 2
Document B Employment Part 2 of 2
Document C Transport
Document D Flitch Way
Document E CPZ
Document F Alternatives

There are 4 additional reference documents referenced and attached to the overall submission. These are:

Ref 1 Threadneedle
Ref 2 Essex FOI
Ref 3 Pigeon-Birchanger Hall Farms
Ref 4 PI 2020

Should the Planning Inspector decide to make a site visit, we respectfully request that attention is paid to:

- The Flitch Way where it is adjacent to Hatfield Forest
- The End of the Flitch Way at Start Hill
- The allocated Employment site North of Taylors farm (Document B Employment Part 1 - Case Study Takeley 005EMP Part 2) and in particular the proximity of the proposed exit to residential properties.
- Airport owned roads and land
- No pedestrian access across M11 J8

(Continue on a separate sheet /expand box if necessary)

6. Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified at 5 above. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination).

You will need to say why each modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.

This submission comprises of this introduction and a further 7 additional documents labelled A to F, and 4 references labelled 1 to 4. Each document labelled A to F specifies modifications required to make the plan sound.

(Continue on a separate sheet /expand box if necessary)

Please note In your representation you should provide succinctly all the evidence and supporting information necessary to support your representation and your suggested modification(s). You should not assume that you will have a further opportunity to make submissions.

After this stage, further submissions may only be made if invited by the Inspector, based on the matters and issues he or she identifies for examination.

7. If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?

☐

No, I do not wish to participate in hearing session(s)

☒

Yes, I wish to participate in hearing session(s)

8. If you wish to participate in the hearing session(s), please outline why you consider this to be necessary:

We are local residents living along the B1256 who will be affected by the LP proposals and have local knowledge of the area.

(Continue on a separate sheet /expand box if necessary)

Please note the Inspector will determine the most appropriate procedure to adopt to hear those who have indicated that they wish to participate in hearing session(s). You may be asked to confirm your wish to participate when the Inspector has identified the matters and issues for examination.