



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.

Core Policies:

The Sustainability Appraisal underpins ALL the Core Policies.

Below are specifically relevant to Takeley and Employment Land North of Taylors Farm.

CP 4 Meeting Business and Employment needs

CP 10 South Area Strategy

CP 10a Takeley Strategic Allocation

CP 11 Stansted Airport

CP 12 Stansted Airport Countryside Protection Zone

CP 13 Delivery of Transport Schemes

CP 14 Safeguarding Land for Strategic Transport Schemes

CP 15 Green and Blue Infrastructure South

CP 26 Sustainable Transport and Connectivity

CP 27 The Impact of Development on Transport Infrastructure

CP 28 Active Travel Walking and Cycling

CP 32 The Movement and Management of Freight

CP 35 Watercourse Protection and Enhancement

CP 38 Sites Designated for Biodiversity and Geology

CP 39 Green and Blue Infrastructure

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

	<u>Yes</u>	<u>No</u>
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.

The LP is unsound because:

1 The plan does not properly appraise “reasonable alternatives” (Sustainability Appraisal para 1.2.3) both in the general overall appraisal eg Garden Communities and in the site specific, employment land selection. Para 5.2.37 simply rules out a Garden Community because of the “*need to avoid a rushed plan that is at risk of failure*”. The previous plan is dated 2005. It is difficult to comprehend how an almost 20 year gap in plan development could be considered rushed.

1.1 The potential of junction 9a of the M11(Stumps Cross) is not considered at all. Costs to upgrade this currently restricted junction would probably be insignificant in comparison to those of the new M11 Jct 7a or the recently completed M11 Junction 8/A120 improvements. Upgrading this junction would open up an opportunity to consider growth in North Uttlesford including a new Garden Community either now or in the future as there are railway links such as Gt Chesterford and the new £90m Cambridge South Station. It would benefit future employment in science parks, R&D – futureproofing is an area that seems to be missing from this plan.

See our Documents F Alternatives and B Employment and Employment Case Study – Land North of Taylors Farm.

2 The Sustainability Appraisal states that the plan sets out to “*remedy issues*” that have arisen by not having a plan. In other words, it intends to build on the “piecemeal development” that has occurred since Uttlesford’s failure to deliver a 5 year housing supply. To achieve this, it has included in the plan a number of sites previously rejected by PINS with sound rationale. This has partially been achieved by “tweaking” policies such as the Countryside Protection Zone to allow a major

distribution site to be built. Is UDC really suggesting that the Planning Inspectorate made unsound judgements on so many occasions?

2.1 Our conclusion is that this plan is Developer driven. This is exacerbated by Essex County Council having a significant input into the plan having sold options to a Developer on land selected for over 1500 houses and a new “all through” School in Lt Canfield, barely a mile from the recently approved “all through” school on the B1256 (nb: Essex do not get money from the Developer unless the land is developed). There is no logic to the proposed new all through school (see Fig1) when a new school more centred in the SW, Newport Thaxted triangle would better cater for those travelling from more rural villages. There are currently four authority run secondary schools in Uttlesford, Saffron Walden, Newport, Stansted Mountfitchet and Gt Dunmow. The Gt Dunmow has recently had approval to relocate on the south-west edge of Gt Dunmow.

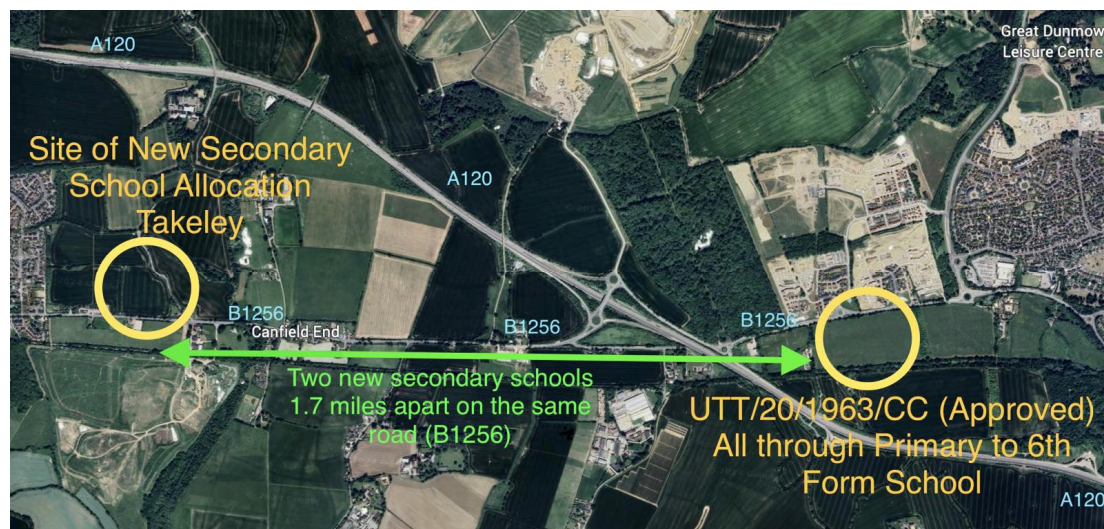


Fig1 The highway congestion from two ‘All through Schools’ during peak times is not adequately reflected in Uttlesford’s traffic calculations and green infrastructure projections. Anecdotal evidence suggests “the school run” is likely to impact heavily on traffic flows (see our Document C Transport)

2.2 Uttlesford appear to have attempted to rationalise this developer driven scenario by including sites that are unsustainable and re-writing policies to make them fit the plan. One example is Takeley 005EMP (see our Document B Employment and Case Study). This site has numerous constraints that question the ability of UDC to deliver. The Developer has put forward several master plans over several years but the inclusion of the site in the Countryside Protection Zone has previously weighed strongly against the Developer.

Uttlesford have redrawn the CPZ to make this site fit, offering no evidence to support this questionable decision whilst at the same time acknowledging the existing CPZ is “*highly valued*” by residents (pg84 Sustainability Appraisal). They have gone further to make it fit by including a SSSI (Hatfield Forest) and an operational area of the airport (balancing ponds C east of the employment site North of Taylors Farm) in an attempt to imply that CPZ land has been enlarged claiming to have “*extended the CPZ to the south to afford new protection to land to*

the southwest of Takeley” (pg84 Sustainability Appraisal). In short, a SSSI owned by the National Trust is already protected, it cannot be developed. An operational area of the airport that already houses pumping stations and balancing ponds for the management of airfield run off will inevitably be developed if the need arises, which may well be the case with increased passenger numbers.

3 The evidence base for Transport and Travel is not sound (see our Document C Transport). The base year for the modelling is 2021 with periods of lockdown (late March 2020 - June 2020, January 2021 – July 2021). Air travel was restricted and homeworking impacted on traffic flows. The plan calls 2021 “*realistic*” which it is not.

3.1 The South Area Strategy is further unsound because it does not attempt to offer any solution to the problems that exist at Junction 8 of the M11. The Plan further misleads in suggesting that recent upgrades to M11J8 will in some way resolve existing issues, but this is not the case. The recent upgrades have been planned for a considerable time and do NOT include the UDC Local Plan (see Ref2 Essex FOI). Increased traffic will impact on the M11 J8 roundabout. The mitigation strategy of traffic lights at a country road at the Start Hill on the Bedlars Gn/B1256 junction – just a few meters away – is likely to be woefully inadequate, evidenced by recent temporary traffic schemes. There is no evidence provided by UDC in the plan to suggest otherwise. Other mitigation such as the proposed traffic lights at the mini roundabout at Coopers End are on a section of road in MAG ownership and may not be achievable.

4 The evidence provided by UDC for Sustainable Travel is unsound and likely to be an overestimate. Estimates of active travel are overoptimistic. The study cites an estimated 15% shift away from car use and there appears to be no evidence base or testing as to what would happen should this not be achieved.

This is particularly relevant with regard to mitigation at Junctions, eg 4 Ashes at Takeley and J8 at the M11.

4.1 Elements of Sustainable Travel on which the South Area Strategy are based depend on upgrading the ‘linear route’, the Flitch Way (SA Para 5.4.108). There is no study nor costings to support this sensitive site that is a Local Nature Reserve, a Country Park and borders Hatfield Forest a SSSI that has already been identified as “*at risk*” by Natural England and falls within the HF Zone of Influence. The Flitch Way is Uttlesford’s ‘only’ Country Park that the Local Plan has now re-designated as a transport route. (See our Document D – Flitch Way)

4.2 The Sustainability Appraisal Para 5.4.108 states that Takeley is “*well-linked to both Bishops Stortford and Great Dunmow, and work has been underway to explore strategic transport upgrades along the A120 / B1256 corridor*”. An FOI to Highways (see Ref 2 Essex FOI) indicates no plans to upgrade either the B1256 or the A120. There are no costings in place, and it is unlikely that the B1256 can be upgraded because of road width and land ownership. There is no room for another road or even a new lane between the A120 and Hatfield Forest in the vicinity of the B1256. “Exploring” upgrades will not deliver.

4.3 The Plan even recognises (SA pg43/44) that with the likely congested roads and no dedicated bus lanes, people will use a private car because there are no possible reasonable alternatives in the vicinity of the B1256.

5 The Plan objectives (2.5) state “*protect the best and most versatile agricultural land*”, yet it proposes to put an unnecessary employment site (TAKELEY 005EMP) of 18ha (27ha site) on grade 2 Agricultural land with the scope to extend to the full 27ha, whilst admitting that this is a “*technical oversupply*”.

5.1 Employment Land is heavily weighted towards the South of the District and Stansted Airport (SA para 5.2.26), but there is no substantial evidence to support this other than summaries of dialogue with Estate Agents and the Developers in question.

5.2 Given that the Knowledge Industry is likely to drive future growth; that the North of the District is compromised by no extensive planned employment growth. This means that workers will have to commute by car from North to South because of the paucity of infrastructure. There is a trend established by Amazon of the use of drones and potentially driverless vehicles, so that weighting of additional B8 industrial land bordering the airport is questionable.

5.3 Over 60ha of B8 land has PP in 2024 Northside of the airport (UTT/22/0434/OP). Effectively there is no foresight or future proofing of employment growth. A decision to put more B8 land on the B1256 is questionable and Developer driven. Note that it was the Developer who requested the inclusion of B8 in their Re18 response.

5.4 No weight appears to have been given to the new £90M station at Cambridge South to serve the Knowledge Industry in the North of Uttlesford. (**Duty to Co-operate**).

6 Unfortunately the plan does not appear to fully reflect the concerns raised and comments made by the Planning Inspectorate to Uttlesford regarding the previous submission (see Ref4 PI 2020) and the soundness of the evidence base across several themes eg Transport including Green and Blue Infrastructure remain questionable.

Attachments:
Ref 2 Essex FOI
Ref 4 PI 2020

(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.

- 1 Remove Employment site North of Taylors Farm Takeley Street (Takeley 005EMP)
- 2 Provide a detailed, accurate study and costings for a Flitch Way “Upgrade”
- 3 Revise Green and Blue Infrastructure to detail how Employment site North of Taylors Farm Takeley Street could benefit from alternative methods of travel
- 4 Detail how mitigation could be applied to the land between Takeley 4 Ashes and M11 J8 (other than sets of traffic lights on two separate areas that are already experiencing tail back.
- 5 Reinstate the Countryside Protection Zone South of the Airport in Takeley Street. This is adjacent to the southern end of the runway and development here will coalesce with the airport
- 6 Remove Pond C, Stansted Airport’s Landside balancing ponds and pumping stations (operational land) from the CPZ
- 7 Detail why M11 J8 has been ignored
- 8 Remove the all through school allocation from Lt Canfield and consider one more central to Uttlesford to cater for the rural villages

(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.