



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

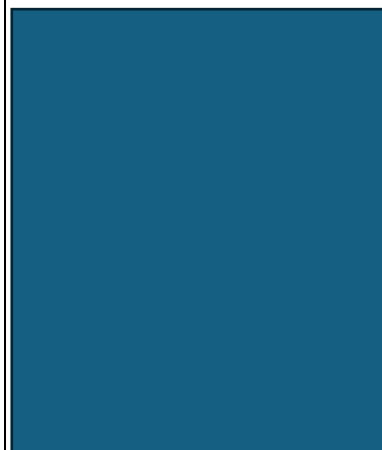
1. Personal Details*

**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.

Employment

Core Policy 4 Meeting Business and Employment Needs

Core Policy 10 South Area Strategy

Core Policy 10a Takeley Strategic Allocation Comprehensive Development Framework
(added after Reg 19 consultation commenced)

Core Policy 38 designated for biodiversity or geology

“Development proposals which would result in significant harm to any other biodiversity or geodiversity interest will only be considered for approval after alternative sites that would result in less or no harm have been considered.”

Core Policy 45 – Protection of Existing Employment Space

Core Policy 46 – Development at Allocated Employment Sites

Core Policy 47 – Ancillary Uses on Existing or Allocated Employment Sites

Core Policy 48 – New Employment Development on Unallocated Sites

Core Policy 49 – Employment and Training

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.

Document B Employment Land Review (PART 1)

The evidence base for the Employment Land Review is entirely inadequate and not robust, thus the plan is unsound.

1 Uttlesford Local Plan allocates around 70 % of Employment land in the South in close proximity to Stansted Airport and to the Stansted Northside committed employment site UTT/22/0434/OP. This development was granted full PP in 2023 for over 60ha, 52ha of which are for Industrial Development including B8 – the same category as the site allocation “Land North of Taylors Farm” (TAKELEY 005EMP). Conditions for Stansted Northside are already in the process of being discharged. This large swathe of B8 land is less than a mile away and includes significant infrastructure upgrades that would meet UDC LP policies. The site has no impact on the residential amenity of neighbouring villages.

Additional land at Northside was put forward at Reg 18 and ignored by UDC (see our Ref1 Threadneedle) with no reasons given. Dialogue with Threadneedle confirms that “UDC were not interested”. It is likely that at least part of this potential development will happen as part of the airport permitted development rights (See our Document F – Alternatives)

2 The NPPF states “*The Government’s overarching economic objective for the planning system is: .. to help build a strong, responsive and competitive economy, by ensuring that sufficient land of the right types is available in the right places and at the right time to support growth, innovation and improved productivity; and by identifying and coordinating the provision of infrastructure.*” (p.5 Employment Needs Land Report). Overall, the strategic employment allocations do not meet these criteria. This is demonstrated by our Case Study Land North of Taylors Farm (see our Document B part 2).

3 The “Planning Practice Guidance” requires a **robust evidence base**. There is not a convincingly robust evidence base for employment sites. Para 3.8 refers to “Feedback from Agents”. There are no details of how the feedback was obtained, no actual details of questions asked, how the evidence was obtained, data etc. This is not robust and no basis for a 20 year Local Plan.

4 The Employment Land Review (para 2.9) is “*built upon the findings*” of a 2011 review. Para 2.29 then goes on to quote a 2016 review requiring a total of 18ha between 2021 and 2041.

Para 2.30 then goes on to claim that the report was updated in 2017 and “This is the most up-to-date published Employment Land Review (ELR) for the district”.

How can a Local Plan base Employment Land Allocations on baseline data that is now seven years out of date?

The Spatial Strategy. Para 4.39 states “*Regarding industrial and logistics land, the report recommends that 52.1ha of floorspace is provided during the Plan period, of which 34.2ha is for the rest of the District (beyond Stansted). Broadly, the non-strategic floorspace at Northside is considered adequate to meet Stansted-specific business needs of 17.9 ha; therefore, the need for the remainder of Uttlesford is 34.2ha of logistics land*” – yet 36ha are planned on the B1256 alone.

UTT/22/0434/OP was granted Planning Permission for 61.86ha of Airport Land to provide 195,100sqm commercial / employment development predominantly within Class B8”. Para 4.4 of the Spatial Strategy then says “*taking into account the latest completions and commitment figures, as at 1st April 2024, there is a residual need for 31.5ha industrial land to meet local Uttlesford needs*”. The Employment Needs Update recommends that industrial allocations are made at Great Dunmow (5-10ha); Saffron Walden (up to 5 ha) and 15ha in the Stansted vicinity around Takeley.

Based on this “evidence” Uttlesford proceed to allocate 36ha to Takeley and Lt Canfield (see LP Appendix 2-4 Site Development Templates pg30-35), more than double the requirement, with 18ha within the Hatfield Forest Zone of Influence and in a residential area. In this context, the allocated Land North of Taylors Farm could be viewed as “speculative”. It also begs the question “Why was the land submitted at Northside dismissed?”. (see our Ref1 Threadneedle).

5 UDC do not appear under their “Duty to Co-operate” to take account of the significant B8 allocations under construction across the M11 J8 roundabout in Hertfordshire.

6 The labour supply statistics in para 2.3.1 are also questionable. The 2016 study used projections based on 2012 and the 2017 report simply “tweaked” the plan period.

7 Para 2.3.4 explicitly recommends the encouragement of development and relaxation of restrictions around the Stansted Airport boundary, particularly at the **Northern Ancillary** area, but this has already been achieved as PP has been granted for 61ha (see para 1 above).

Para 2.3.9 states “*The economic potential of the airport should not be underestimated, and further industrial and business space should be considered for allocation in the area beyond Northside*” but UDC have done the opposite and located 18ha of an unnecessary allocation directly South of the Airport where there is no adequate infrastructure, whilst ignoring the Threadneedle response (see our Ref1) for Northside B8 land, at least some of which is on brownfield land.

Para 2.46 appears to “guess” residual need (there is no substantive evidence) of “15ha in the vicinity of Stansted around Takeley, Bishop’s Stortford borders,

Stansted Mountfitchet or Birchanger” and UDC then allocates 18ha to Takeley – Land North of Taylors Farm - rather than follow this recommendation.

8 Land south of A120 and north of Stortford Road, Great Dunmow – (pg33-35 LP Appendix 2-4 Site Development Templates) is a further 23.5 ha of which 18ha are developable offering the same Warehouse and Distribution opportunities as Land North of Taylors Farm but with far less constraints.

9 Safety Margin

It appears that the 15ha identified as needed has translated into 36ha at two sites on the B1256 – More than double the requirement.

Most of this is justified by calling it a “safety margin”. UDC do not apply similar “safety margins” to other key areas, particularly transport modelling.

Section 2 Employment Needs Update

10 The evidence base and models are questionable.

10.1 Section 5 admits the difficulty with the projections/models. “The need without replacement demand would be only 3ha based on the labour model” but goes on to recommend 15ha **for the whole of the district** and 8ha for the Stansted Element. Given that Stansted North already has permission for significantly more land, this suggests a **massive oversupply** on the B1256. This is excused as a “safety margin” (para 5.4).

10.2 There is no sound evidence to support “high levels of local need” over and above the 55ha of B8 at Northside Stansted Airport and no need for “further clarification” of the scheme. Planning Consent was granted in 2023 (UTT/2204/34/OP) and work is well underway. Para 3.5.3 states “*Future phases are expected to accommodate a combination of airport-related and other commercial businesses including local needs in due course*”. It also states “*Based on discussion with promoters and the masterplan for the development it is expected that the first phase of the Northside development at Stansted Airport will focus on catering for big box regional/national logistics need*”

10.3 With reference to discussion about data, key points are:

- Uttlesford is not a traditional area for large warehousing (what sound evidence is there to support it becoming one?)
- Harlow is a preferred area for Logistics (So why would companies come to Uttlesford?)
- Demand is led by Stansted which now has permission for over 60ha of employment land of which about 55ha are for B8 and scope to extend
- If there are high levels of local need, the substantial warehousing on the Hertfordshire side of the M11 will cater for large amounts of this.

10.4 Employment figures are categorised differently from other documents as “Transport Warehouse and Postal”, so the statistics are not directly comparable, para 4.6 indicates a growth in this sector of 2486 jobs over a 20 year period, ie 124 per annum.

10.5 Why then are UDC intent on a Warehouse and Distribution area situated at Land North of Taylors Farm Takeley Street that would cater for 1600 jobs (see our Ref3 Pigeon-Birchanger Hall Farms) to meet the unsubstantiated local need (no figures supplied to justify this supposed need) that they allege will not be met by the recently approved Stansted Northside. This in addition to 18ha of B8 Land South of the A120 and North of Stortford Road, Lt Canfield.

10.6 Para 5.6 states that “*despite the scale of Northside, there is uncertainty regarding phase 2. It is recommended that more land is allocated in the Stansted vicinity around Takeley / Bishop’s Stortford borders / Stansted Mountfitchet / Birchanger of 15 ha*”. There is no uncertainty. UDC use this as an excuse to allocate 36ha across two sites, both adjacent to the B1256 and with a proposed all through Primary to 6th form school also on the B1256 between the two of them.

10.7 Core Policy 4 “Meeting Business and Employment Needs” page 57 states “*Employment land has been allocated relatively to the number of houses allocated in Takeley*”. Without taking account of the land South of the A120, either employees would have to commute into the area or 1 person from each of the 1500 plus houses planned in Takeley will be employed at the 18ha site North of Taylors Farm – a highly unlikely scenario in land that UDC refer to as a “*technical oversupply*”. Yet, demographics indicate that (para 6.2) Uttlesford has a relatively small working population, compared to surrounding LADs, the region and nation, as well as relatively high dependency ratios. It also has a very low unemployment rate (para 2.10) further suggesting that large numbers of employees will commute, impacting traffic flows.

10.8 It would seem that the B8 Employment Land Allocation is justified partially on the grounds of “Replacement Demand” but Core Policy 45 is clear that existing employment sites remain for that purpose albeit buildings may need to be upgraded.

Attachments:

Ref1 Threadneedle

Ref3 Pigeon-Birchanger Hall Farms

(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 Review employment land allocations.

2 Review baseline stats and provide up to date figures for both Land Allocations and Employment. Justify stats and provide source data.

3 Reconsider focus on warehouse and distribution in favour of knowledge industries and reducing levels of commuting.

4 Focus on future proofing employment allocations.

(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.