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 23:59 Monday 14th 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

UTTLESFORD LOCAL PLAN
Towards Net Zero Carbon

1. Personal Details*		2. Agent's Details (if applicable)
		Takeley Street Residents Group - Committee
Title		
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)		

**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.*

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 Policy 5 – Providing Supporting Infrastructure and Services

Core Policy 10 – South Area Strategy

Core Policy 10a – Takeley Strategic Allocation Comprehensive Development Framework.

Core Policy 11 – London Stansted Airport

Core Policy 12 – Stansted Airport Countryside Protection Zone

Core Policy 13 – Delivery of Transport Schemes within the South Uttlesford Area

Core Policy 14 – Safeguarding of Land for Strategic Transport and Infrastructure Schemes in the South Uttlesford Area

Core Policy 26 – Providing for Sustainable Transport and Connectivity

Core Policy 27 – Assessing the Impact of Development on Transport Infrastructure

Core Policy 28 – Active Travel – Walking and Cycling

Core Policy 32 – The Movement and Management of Freight

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.

UTTLESFORD LOCAL PLAN
Towards Net Zero Carbon

This document highlights the <u>mistakes, discrepancies and misrepresentations</u> from the TRANSPORT section of the Uttlesford Local Plan Reg 19.

The following document was created to highlight the mistakes, discrepancies and misrepresentations from the Uttlesford Local Plan Regulation 19 TRANSPORT section, specifically focusing on South Uttlesford, Takeley and the proposed 18ha Takeley North industrial site on the B1256 to the West of Takeley (Takeley EMP005). It is our view that the location for Takeley EMP005 is development led, unsound, unsustainable and should be re-located to a more suitable and sustainable location such as Stansted Northside.

<u>Table of Contents</u>

Page 3: **<u>Misrepresentation in Appendix 8: Safeguarded Land for Transport Uses in relation to Core Policies 8 and 14.</u>**
The *"safeguarded transport land"* for longer term expansion of the secondary school at Takeley is in fact in Saffron Walden which is 14 miles away.

Page 4: **<u>Misrepresentation in Appendix 8: Safeguarded Land for Transport Uses in relation to Core Policies 8 and 14.</u>**
The "land safeguarded for a public transport and active travel connection between the Takeley allocation and Stansted Airport, Takeley" ends in a parcel of land located within the MAG airport boundary.

Page 5 - 7: **<u>Misrepresentation in Appendix 8: Safeguarded Land for Transport Uses in relation to Core Policies 8 and 14.</u>**
The parcel of land *"Safeguarded for transport use (A120 Access)"* is unsustainable due to 3 clear reasons:
1. Area is located within the current and proposed CPZ.
2. Area is located within a high-risk flood area with potential for loss of life.
3. There is no direct access available to the A120, and unlikely to be so in the future.

Page 8: **<u>Misrepresentation in Appendix 8: Safeguarded Land for Transport Uses in relation to Core Policies 8 and 14.</u>**
"Land safeguarded for mobility hub uses" is incorrectly drawn on the map within Reg 19.

Page 9: **<u>Incorrect data referenced and used within the *'Multi-modal viability study for the A120 corridor in Uttlesford'.*</u>**

Page 10: **<u>Incorrect maps shown within the 'Multi-modal viability study for the A120 corridor in Uttlesford' for Takeley EMP005.</u>**
Incorrect location, boundary and size displayed.

Page 11: **<u>Incomplete data within table 6-2 of the *'Multi-modal viability study for the A120 corridor in Uttlesford'.*</u>**

Page 12 - 13: **<u>Lack of highway capacity mitigation within Takeley, evidenced within the 'Multi-modal viability study for the A120 corridor in Uttlesford'</u>**

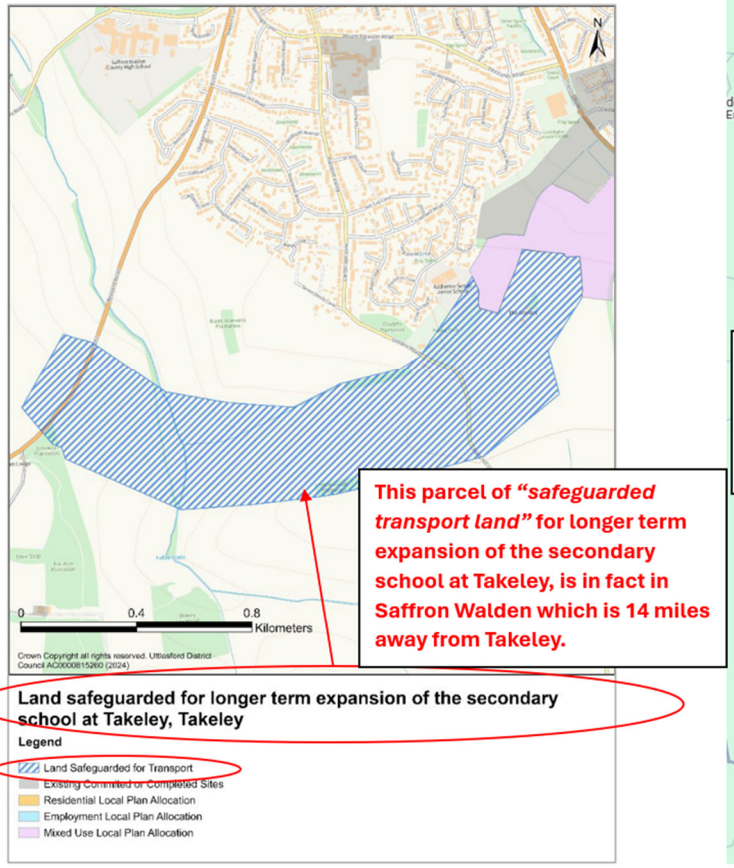
Page 14 - 16: **1,773 OGV movements per day in the Takeley EMP005 site, is HIDDEN within the local plan *'Multi-modal viability study for the A120 corridor in Uttlesford'.***
HGV Flows in Takeley – Misrepresentation of data and false statement regarding no increase of HGV movements on the B1256. There will be 1,773 OGV movements per day (according to UDC data).

Page 17 – 18: ***"Sustainable Transport Local Plan"* falsely refers to Highway Mitigation and junction improvements and M11 Junction 8.**
Note there are no planned upgrades or improvements planned for the M11 J8 within the current highways plan.

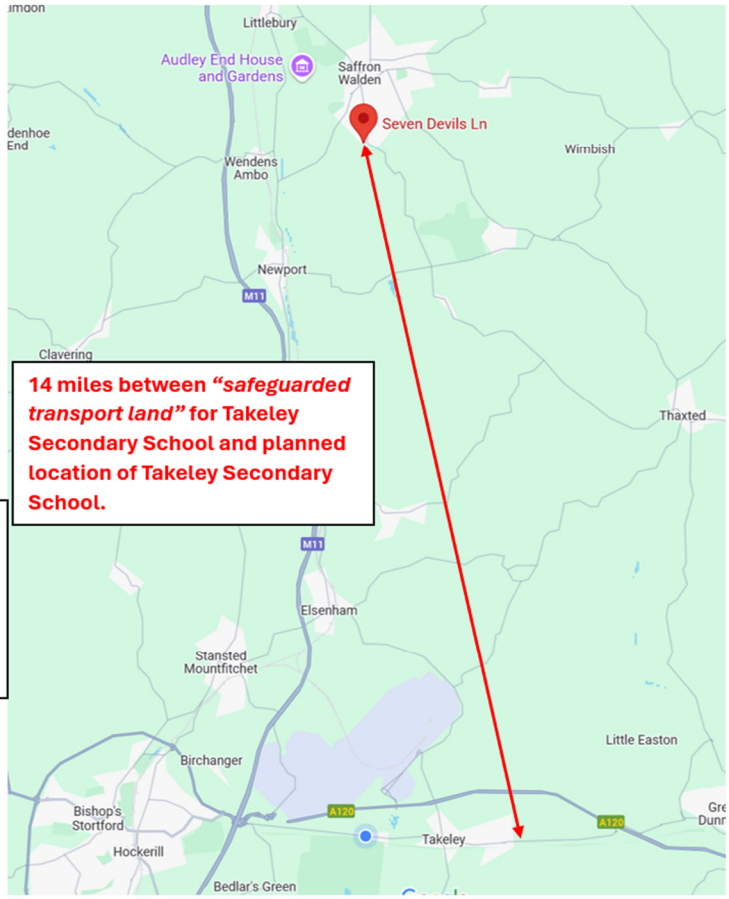
Page 19: **Recommended Local Plan Reg 19 modifications.**

Misrepresentation in Appendix 8: Safeguarded Land for Transport Uses in relation to Core Policies 8 and 14:

Appendix 8: Safeguarded Land for Transport Uses in relation to Core Policies 8 and 14

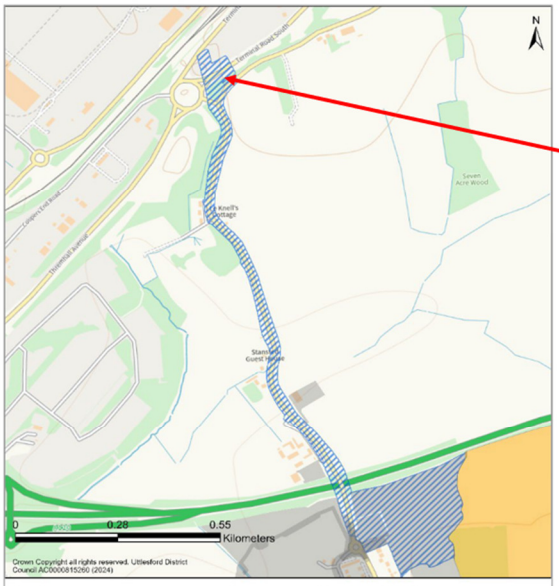


This parcel of *"safeguarded transport land"* for longer term expansion of the secondary school at Takeley, is in fact in Saffron Walden which is 14 miles away from Takeley.



14 miles between *"safeguarded transport land"* for Takeley Secondary School and planned location of Takeley Secondary School.

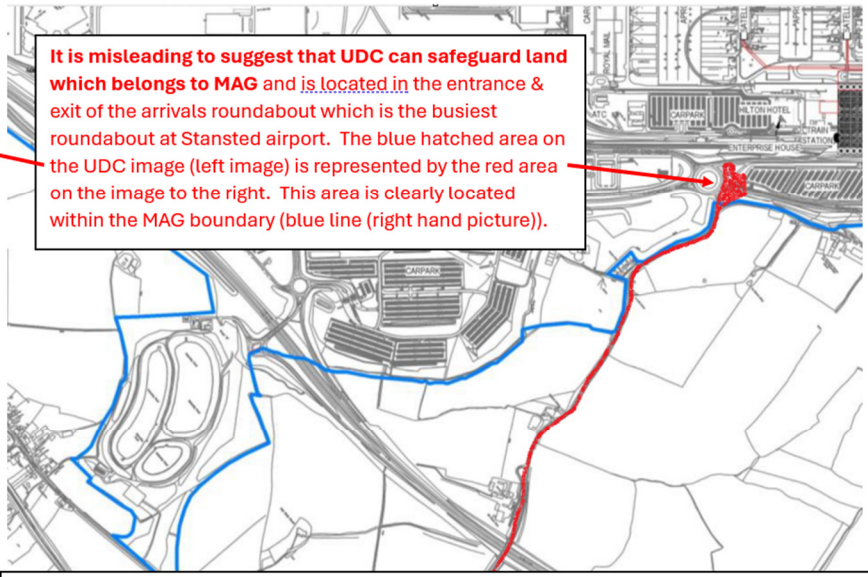
Misrepresentation in Appendix 8: Safeguarded Land for Transport Uses in relation to Core Policies 8 and 14:



Land safeguarded for a public transport and active travel connection between the Takeley allocation and Stansted Airport, Takeley

Legend

Land Safeguarded for Transport



It is misleading to suggest that UDC can safeguard land which belongs to MAG and is located in the entrance & exit of the arrivals roundabout which is the busiest roundabout at Stansted airport. The blue hatched area on the UDC image (left image) is represented by the red area on the image to the right. This area is clearly located within the MAG boundary (blue line (right hand picture)).

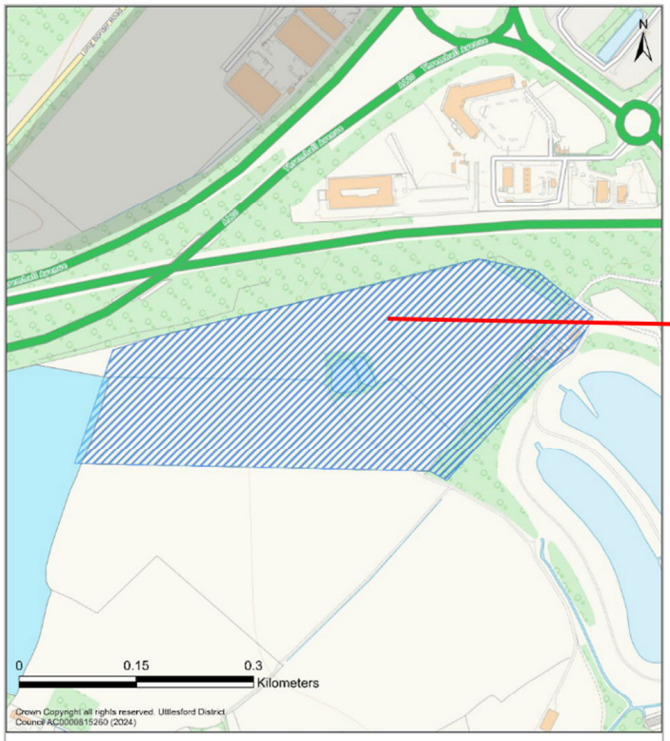
LP19 Core Policy 26 states: Deliver an improved environment for pedestrians and cyclists in accordance with ECC and LTN 1/20 standards.

MAG commented on the above safeguarded land at Reg 18: *"delivering a high quality, LTN1/20-compliant scheme here will be very challenging to deliver and potentially impractical".*

The plan has not changed since Reg18. In MAG's Reg18 comments you will find the following:

1. *In all potential design scenarios, the red area within MAG boundaries above would involve crossing a minimum of three roads – Parsonage Road near Cooper End Roundabout and both dual-carriageways of Terminal Road South. Each of these crossings would affect the current free-flow of traffic around the airport.*
2. *MAG estimate the cost of building a bridge crossing to be potentially up to £2m and therefore unsustainable.*
3. *MAG comment that delivering a high quality, LTN1/20-compliant scheme will be very challenging to deliver and potentially impractical.*
4. *MAG comment that the quality of this route is unlikely to deliver the 15% modal shift expected in the Takeley Model Output Study.*

Misrepresentation in Appendix 8: Safeguarded Land for Transport Uses in relation to Core Policies 8 and 14:



Land safeguarded for A120 Access, Takeley Street

Legend

- Land Safeguarded for Transport
- Existing Commited or Completed Sites
- Residential Local Plan Allocation
- Employment Local Plan Allocation
- Mixed Use Local Plan Allocation

The parcel of land 'Safeguarded for transport use (A120 Access)' is **unsustainable** due to 3 clear reasons:

1. **Area of land hatched blue is within the current Countryside Protection Zone (CPZ) 2016 and also within the proposed CPZ for Local Plan Regulation 19.** The HANKINSON DUCKETT ASSOCIATES Countryside Protection Zone Study for Uttlesford District Council May 2024 Revision 02, specifically states: *"An area around Stansted Airport (the Stansted Airport Countryside Protection Zone) is protected from development to conserve and enhance the 'rural' character of the area around the airport". (See Figure 14 below).*

Land safeguarded for A120 Access, Takeley Street (associated with proposed 18ha industrial site North of Takeley Street) is located within the current and proposed Countryside Protection Zone (CPZ).

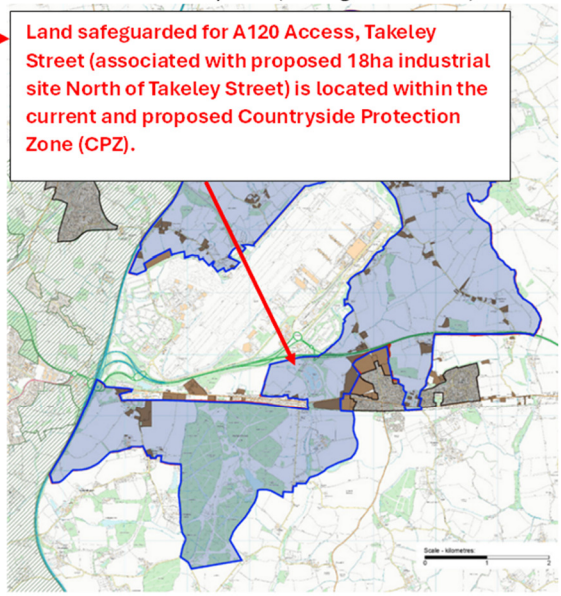
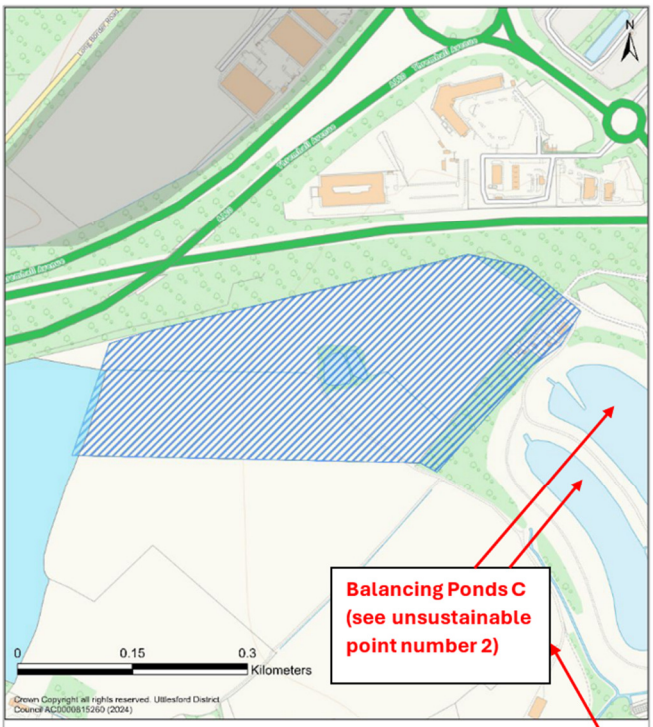


Figure 14 *Potential Countryside Protection Zone*

Misrepresentation in Appendix 8: Safeguarded Land for Transport Uses in relation to Core Policies 8 and 14:



Balancing Ponds C (see unsustainable point number 2)

Land safeguarded for A120 Access, Takeley Street

Legend

- Land Safeguarded for Transport
- Existing Commited or Completed Sites
- Residential Local Plan Allocation
- Employment Local Plan Allocation
- Mixed Use Local Plan Allocation

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The parcel of land 'Safeguarded for transport use (A120 Access)' is **unsustainable** due to 3 clear reasons:

2. Area of land hatched blue is located directly adjacent to the OPERATIONAL 'Balancing Pond C Reservoir' **within a High-risk flood area with potential for loss of life**. The Uttlesford District Council Level 1 Strategic Flood Risk Assessment created by JBA consulting notes the following *"It should also be understood that the "risk category" of a reservoir is set by the potential damage and loss of life in circumstances where there is a breach or an extreme flood event. Accordingly, it is possible that allocation of new development downstream of an existing reservoir could potentially change the risk category and result in a legal requirement (under the Reservoirs Act 1975) to improve the structural and hydraulic capacity of the dam. As the cost of implementing such works can be substantial consideration should be given to considering the implications and whether it* ***would be more appropriate to place development in alternative locations not associated with such risk****".*

   10.2.1 Sequential approach to development

   *The NPPF supports a risk-based and sequential approach to development and flood risk in England, so that development is located in the lowest flood risk areas where possible; it is recommended that this approach is adopted for all future developments within the study area. (****Chapter 14*** *of the National Planning Policy Framework (NPPF), under paragraphs* ***167 to 173)***

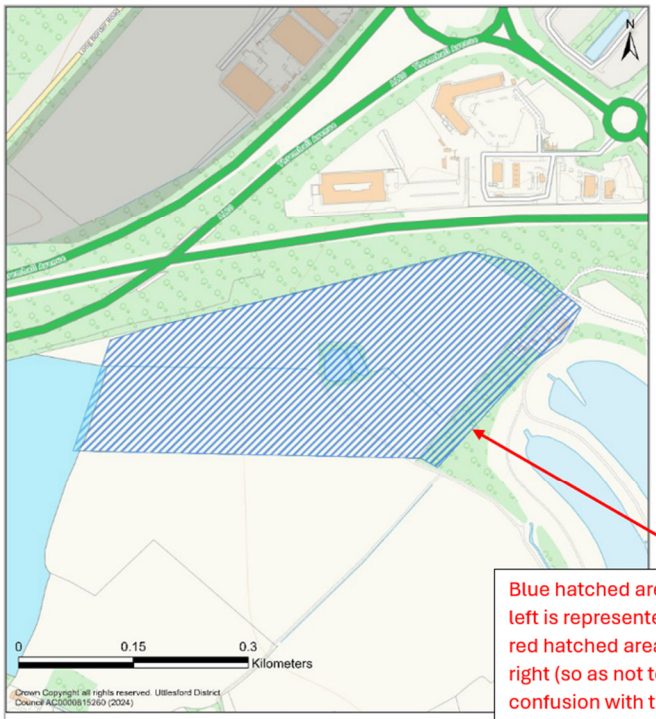
   New development and re-development of land should wherever possible seek opportunities to reduce overall level of flood risk at the site, for example by:

   - ***Relocating development to areas with lower flood risk.***

Table 4-3: Reservoirs with flood extents that impact the study area.

Reservoir	Easting and Northing	Reservoir owner	Risk Category	Within Uttlesford Boundary	Local Authority
Balancing Pond C	554999, 221632	Stansted Airport Ltd	High-risk	Yes	Essex

Misrepresentation in Appendix 8: Safeguarded Land for Transport Uses in relation to Core Policies 8 and 14:



Land safeguarded for A120 Access, Takeley Street

Legend

- Land Safeguarded for Transport
- Existing Commited or Completed Sites
- Residential Local Plan Allocation
- Employment Local Plan Allocation
- Mixed Use Local Plan Allocation

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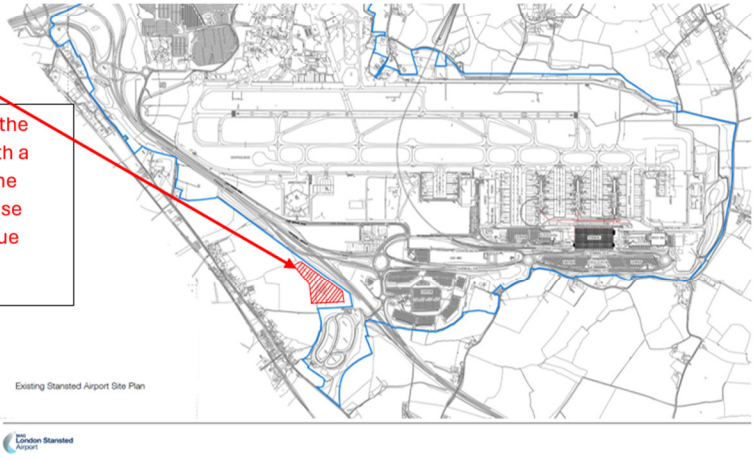
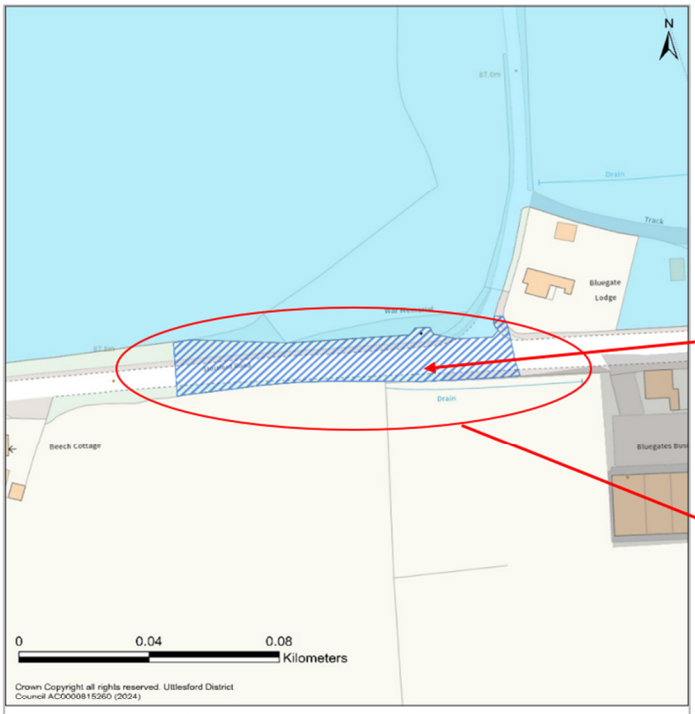
Blue hatched area to the left is represented with a red hatched area to the right (so as not to cause confusion with the blue MAG boundary line).

The parcel of land 'Safeguarded for transport use (A120 Access)' is **unsustainable** due to 3 clear reasons:

3. **There is no direct access available to the A120 as the land within the blue boundary line below is owned by the Manchester Airport Group (MAG).** The A120 connection roads located to the North & East of the balancing ponds are MAG privately maintained and owned road infrastructure. The blue line boundary shown on the diagram below represents MAG owned land. No agreement exists between developers or Uttlesford District Council that allows access to the MAG private road infrastructure for the proposed 18ha industrial site North of Takeley Street.
   In Reg18 MAG commented on the proposed 'public transport and active travel connection' which encroached on to the airports private transport interchange and recommended the council review whether that route should stay within the plan. This new area, hatched red below, was not present within Reg18 and therefore MAG did not have the opportunity to comment.



Misrepresentation in Appendix 8: Safeguarded Land for Transport Uses in relation to Core Policies 8 and 14:



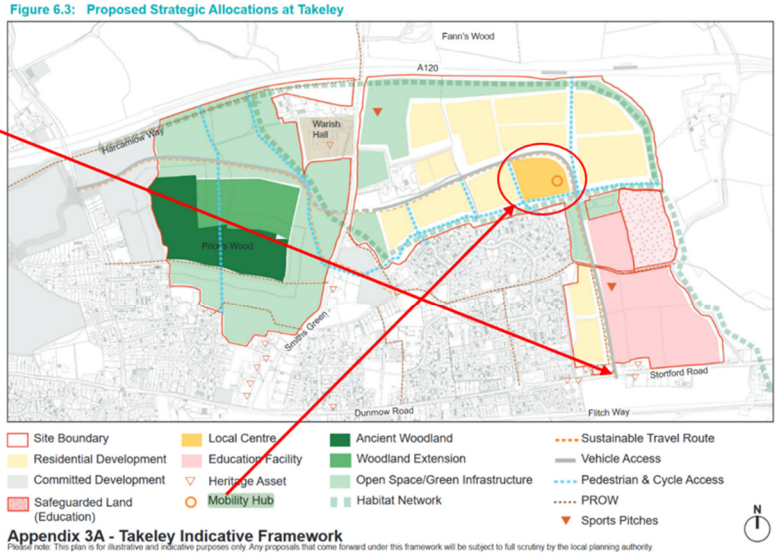
Land safeguarded for mobility hub uses, Little Canfield

Legend

- Land Safeguarded for Transport
- Existing Commited or Completed Sites
- Residential Local Plan Allocation
- Employment Local Plan Allocation
- Mixed Use Local Plan Allocation

The parcel of land safeguarded for mobility hub uses in Little Canfield is incorrectly drawn on the map within Reg 19. The area hatched in blue allows barely enough space for a simple bus stop, let alone an entire mobility hub, and includes land currently being used as a World War 2 Memorial for the 386th USAAF Bomber Group.

Figure 6.3: Proposed Strategic Allocations at Takeley



Appendix 3A - Takeley Indicative Framework

Please note: This plan is for illustrative and indicative purposes only. Any proposals that come forward under this framework will be subject to full scrutiny by the local planning authority.

Incorrect data referenced and used within the *'Multi-modal viability study for the A120 corridor in Uttlesford'*.

UDC claims to use data from the Census 2011 for Uttlesford, when in fact they have used the data from the TRICS national database.

Uttlesford District Council (UDC) and Essex County Council (ECC) have commissioned Essex Highways to undertake a multi-modal viability study for the A120 corridor in Uttlesford. Version 3 of this document was completed in May 2024.

The aim of this report is to consider the public transport service enhancements that would be most viable with the level of development planned. **However, this report is full of inaccuracies and presumptions.**
Page 4: 2.2 Transport Modes. States "There is a clear dominance of car trips (50%) along the corridor currently, with a pattern of people accessing rail stations (1%), but low share of bus (0.2%) to access key working locations. (Census 2011)".

This above sentence is incorrect and misleading! Unsound. The data in the sentence above is taken from the TRICS national data on Page 34 of the report instead of using the Census 2011 data available on Page 33 which is directly applicable to Uttlesford.

The actual percentages based on the Census **2011** for Uttlesford is: car trips (71.80% along the corridor, rail stations (9.39%), bus (1.98%).

The actual percentages based on the Census **2021** for Uttlesford is: car trips (87% along the corridor, rail stations (2.43%), bus (0.64%)

The table below shows the difference between the figures presented by UDC (national TRICS data) and the ACTUAL figures from the Census:

Transport Modes

Data used from	Car Usage	Train Usage	Bus Usage
TRICS national data	50%	1%	0.20%
2011 Census Uttlesford	72%	9%	2%
2021 Census Uttlesford	87%	2.43%	0.64%

This would signify that car usage in the district is significantly higher than the national average suggested in the report. Therefore incorrect base data has been assumed during their calculations. It would be inaccurate to assume 50% of new households would take advantage of proposed public transport services due to the higher usage of cars in our district. If UDC are calculating 50% of households would use public transport because only 50% drive, it would be inaacurate because 72 – 87% of households drive, which would only leave a maximum of 28 – 13% using public transport.

(Data can be found within Regulation 19 Evidence Base / Transport / Transport Assessment Supporting Technical Docs / Uttlesford Transport Study Trip Generation Page 33-34: https://www.uttlesford.gov.uk/media/13286/Transport-Assessment-Supporting-Technical-TN320-Uttlesford-Transport-Study-Trip-Generation-Final/pdf/Transport_Assessment_Supporting_Technical_TN320_Uttlesford_Transport_Study_Trip_Generation_Final.pdf?m=1725463022580)

Incorrect maps shown within the 'Multi-modal viability study for the A120 corridor in Uttlesford' for Takeley EMP005.

Page 14 Figure 3.2 & Page 19 Figure 4.1: Both maps show an incorrect boundary for Land North of Takeley Street.

The maps place the employment site partially within the protected CPZ. **Misrepresentation**

Page 31. Active Travel and Mobility Hubs. Section 5.1 (Walk and Cycle Options) states: *"Crossing facilities and new cycle and footpaths would also be required between Parsonage Road and Stansted Airport Rail Station and Terminal Building as no pedestrian and cycle facilities are currently provided at this location".* **This is unsound due to the following MAG response in Reg 18 which has been completely ignore in the Reg 19 plans:**

The Reg18 comments from Manchester Airport Group (MAG) dated 18/12/2023 relating to the above scenario states*: "In all potential design scenarios, the area within MAG boundaries listed within the scenario above would involve crossing a minimum of three roads – Parsonage Road near Cooper End Roundabout and both dual-carriageways of Terminal Road South. Each of these crossings would affect the current free-flow of traffic around the airport. MAG estimate the cost of building a bridge crossing to be potentially up to £2m and therefore unsustainable. MAG comment that delivering a high quality, LTN1/20-compliant scheme will be very challenging to deliver and potentially impractical. MAG comment that the quality of this route is unlikely to deliver the 15% modal shift expected in the Takeley Model Output Study".*

Incorrectly located Employment zone. Located too far East which places the employment zone within the CPZ.

Area should be further west, as highlighted with the red line.

Also the proposed site measures 18ha not 15ha as noted on the plan.

Incorrect measurement of employment zone at Northside.

Site listed as 19500sqm (1.95ha). Should be listed as 62ha.

A120 Corridor Study
Revised Development Scenario (March 2024)

3.1.2 Employment Growth

Figure 3.2 shows the areas for employment growth A120 corridor area as set out in the Revised Development Scenario (March 2024).

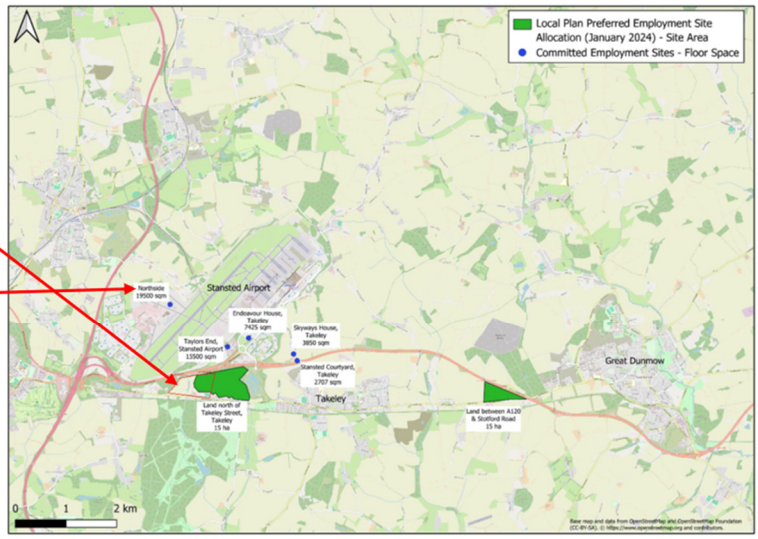


Figure 3.2: Employment Development (Revised Development Scenario)

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Incomplete data within table 6-2 of the *'Multi-modal viability study for the A120 corridor in Uttlesford'.*

The A120 corridor assessment*, page 14, Table 2-2 has the following "Proposed Interventions in Takeley":

Public Transport:
PT.02. New bus service between the development site and Stansted Airport utilising a sustainable transport corridor.

See section above: **Safeguarded Land for Transport Uses in relation to Core Policies 8 and 14** which explains why this proposed intervention is unlikely to proceed.

The A120 corridor assessment*, page 42 Table 6-2 recommended interventions and indicative costs total £11,500,000 without the cost of a New Bus Service, Modal Filter, and reconfiguration of Parsonage Road Roundabout. Are these costs sustainable?

Table 6-2: Recommended Interventions and Indicative Costs: Takeley

Ref	Scheme	Notes	Estimate
PT.01	**Bus Service Frequency:** Increase the frequency of services, particularly those to Stansted Airport and Bishop's Stortford.	Suggested annual capital funding contribution towards subsidy of increased service provision. Cost does not take into account revenue generation.	£500,000
PT.02	**New Bus Service:** New bus service between the development site and Stansted Airport.	*Details contained in Jacobs A120 Public Transport Corridor Study.*	tbc
PT.03	**Real Time Information:** Provide Real Time Information at all stops.	Based upon 30 bus stops (including additional for new developments) at a cost of £3,000 per stop.	£90,000
PT.04	**Discounted Bus Travel:** Offer free bus travel to all new residents for 12 months.	Based upon one Stagecoach daily travel pass per new household at £8 per/day for working days only. Take-up from residents envisaged to be 50%.	£4,000,000
PT.05	**Discounted Rail Travel:** Offer discounted rail travel to all new residents for 12 months.	Based upon £1,000 rail season ticket discount for one year.	£1,900,000
PT.06	**Mobility Hub:** Provision of a 'mobility hub' multi-modal transport interchange.	Scale and scope to be determined.	£100,000 - £2,000,000
WC.01	**Shared Mobility:** Provision of a 'shared mobility' scheme (which includes e-bike hire).	n/a	£1,000,000
WC.02	**Cycle Routes:** Local connections onto the NCN plus improvements to the Flitch Way and LTN 1/20 compliant route between Takeley and Stansted Airport.	Assumed to be 2.0km of new cycle infrastructure at a cost of £1,000,000 per km.	£2,000,000
WC.03	**Modal Filter:** Introduce a modal filter on Smiths Green Lane so that it doesn't compromise the safety of cyclists when it is surrounded by development on both sides.	To be provided as an integral part of the development of the sites.	n/a
HC.01	**Signal Optimisation:** Optimisation of all signalised junctions within the village.	Based upon a cost of £2,000 per set of signals and an assumption that one junction will be optimised.	£2,000
HC.02	**Parsonage Road:** Reconfiguration of Parsonage Road mini roundabout to the east of Coopers End roundabout (near Stansted Airport) to create a new signalised junction.	*To follow*	*To follow*

* https://www.uttlesford.gov.uk/media/13282/Sustainable-Transport-A120-Corridor-Multi-Modal-Study-PUBLISHED/pdf/Transport_Assessment_A120_Model_Outputs_TN409_PUBLISHED_pvr6em025cpb.pdf?m=1725297674550

Lack of highway capacity mitigation within Takeley, evidenced within the 'Multi-modal viability study for the A120 corridor in Uttlesford'

The A120 corridor assessment*, Page 68 details the impact of the new housing allowance upon a *"new access road"* to be built within the proposed 1506 residential homes site in Takeley. This number of additional vehicles per day only includes the residential impact and does not include the impact of the 2 x 18ha employments sites also included within Takeley. This additional 1700 traffic flow in one hour will either have to join Parsonage Road or the B1256 causing **unsustainable** traffic. The following 3 extracts from the A120 corridor highlight a lack of highway capacity mitigation.

3.2 IMPACT OF THE LOCAL PLAN ALLOCATIONS

3.2.1 Both committed development and the Local Plan allocations will impact on the volume of traffic on the road network across the district. The figures contained within **Appendix C** illustrate changes between the Base Year flows and Reference Case flows, and the Reference Case flows and Local Plan Case flows respectively. The data highlights that:

Takeley

- Committed growth will result in only a modest increase in the number of vehicles on the B1256 through Takeley in both peak periods, certainly within the context of the more substantial increases to be experienced in the wider A120 corridor.
- In the AM peak increases in westbound flow do not exceed 150 additional vehicles in the centre of the village, with a similar number in the PM peak period.
- The Local Plan allocations will have more of an impact – understandably given the scale of growth identified for the village. The new access road to be provided, north from the B1256 will see two-way flows approaching 1,700 vehicles in the AM peak period, reducing to around 1,000 vehicles in the PM peak.
- The B1256 itself will see increases to the east of the village in the AM peak and more modest increases along its entire length in the PM peak period.

Uttlesford Transport Study
Traffic Impacts of the Uttlesford Local Plan Site Allocations: A120 Corridor

3.3 IMPACT OF INTERVENTIONS ON VOLUME OF TRAFFIC

3.3.1 The proposed interventions to mitigate the impact of Local Plan growth are detailed in **Chapter 2.0**. The ability of these measures to alleviate increases in the volume of traffic is illustrated in the AM and PM peak periods is illustrated in **Appendix C** and summarised below.

Takeley

- The largest increases in traffic in the corridor, both in terms of actual numbers and percentages are in Takeley. The lack of a continuous vehicular through route between Parsonage Road and the B1256 within the development, will see the predominant movement of traffic concentrated on the new distributor road and the B1256 to the east of the village.
- By prioritising buses and active travel through the development between Parsonage Road and Smiths Green Lane, it will help to create more liveable, sustainable communities. The volume of traffic which could travel eastbound before joining the A120 at the Dunmow West Interchange is considered manageable and an appropriate outcome for the creation of a more connected and accessible community to the north of the village.

Takeley

- Regarding routes through Takeley (Routes 7, 8 and 9 in **Figure 4-1**), no highway capacity mitigation is proposed. Consequently, delays associated with the 'pinch point' at the Four Ashes junction will persist and are reflected in the journey times and traffic speeds (see **Table 4-7**).
- Traffic will be encouraged to access the A120 via the B1256 at Dunmow West Interchange to reduce pressure on the Four Ashes junction.
- The removal of traffic from Smiths Green Lane and the priority given to active travel within the new site allocations, will help to create a high-quality public realm through people and place led (as opposed to car orientated) development this will improve sustainable travel options for both new and existing residents.

* https://www.uttlesford.gov.uk/media/13282/Sustainable-Transport-A120-Corridor-Multi-Modal-Study-PUBLISHED/pdf/Transport_Assessment_A120_Model_Outputs_TN409_PUBLISHED_pvr6em025cpb.pdf?m=1725297674550

1,773 OGV movements per day in the Takeley EMP005 site, is HIDDEN within the local plan *'Multi-modal viability study for the A120 corridor in Uttlesford'.*

UDC's claim of No expected change in number HGV Flows in Takeley is a misrepresentation of data - UDC's own data suggests there will be an additional 1,773 HGV movements per day at the Takeley North industrial site (Takeley EMP005).

0.985 OGV movements per day, per 100sqm = 1,773 OGV movements per day over 18ha (*4).

The Uttlesford Transport Study, Traffic Impacts of the Uttlesford Local Plan Site Allocations: A120 Corridor Multi-Mode Study*, page 22 states: *"Assumptions were made regarding the level of HGVs likely to be generated by the employment sites included in the Local Plan. These were derived from the TRICS database (a national database on trip rates) based upon the nature of the employment provision.* ***With Local Plan growth and mitigation in place, these numbers are not expected to change****, equating to between 30 and 40 HGVs on the B1256 in the peak hour, and still less than one HGV a minute. There is therefore no evidence that the Local Plan will have any detrimental impacts on the volume of HGV movements within the village, despite the employment allocations on the edge of the built-up area".*

The "assumptions" above are incorrect! The TRICS database data within UDC file Uttlesford-Transport-Study-Trip-Generation(*2) Page 164 predicts 0.98 total trip rates per 100sqm of warehousing. **The Transport study report is clearly providing a FALSE statement that HGV numbers are not expected to change**. An increase of HGV movements will occur at the proposed allocation at the Takeley North industrial site on the B1256 (Takeley EMP005), with the **potential of 1,773 additional total HGV movements per day**. The transport evidence topic paper (*3) Page 41 states *"the employment sites will require a HGV routing strategy which will focus on routing HGV traffic towards the strategic road network by the most direct route".* The only road that exists is the already oversubscribed B1256 – no other routes exist or can exists without major costs of connecting to and creating a new junction on the A120 which would only serve the Takeley North proposed employments site which would be **unsustainable**.

Calculation using the UDC data from the TRICS database for the proposed Takeley EMP005 B8 (storage and distribution) site on the B1256 in Takeley.

The following is an extract from Page 164 of the Uttlesford Study Trip Generation(*2). Note the highlighted sections which will be used on the breakdown of data.

TRICS 7.9.1 300322 B20.41 Database right of TRICS Consortium Limited, 2022. All rights reserved **Friday 27/05/22 Page 7**

WYG Executive Park, Avalon Way Leicester Licence No: 705102

TRIP RATE for Land Use 02 - EMPLOYMENT/F - WAREHOUSING (COMMERCIAL)
MULTI-MODAL OGVS
Calculation factor: 100 sqm
BOLD print indicates peak (busiest) period

	ARRIVALS			DEPARTURES			TOTALS		
Time Range	No. Days	Ave. GFA	Trip Rate	No. Days	Ave. GFA	Trip Rate	No. Days	Ave. GFA	Trip Rate
00:00 - 01:00									
01:00 - 02:00									
02:00 - 03:00									
03:00 - 04:00									
04:00 - 05:00									
05:00 - 06:00									
06:00 - 07:00									
07:00 - 08:00	4	12283	0.035	4	12283	0.041	4	12283	0.076
08:00 - 09:00	4	12283	0.033	4	12283	0.037	4	12283	0.070
09:00 - 10:00	4	12283	0.047	4	12283	0.039	4	12283	0.086
10:00 - 11:00	4	12283	0.041	4	12283	0.045	4	12283	0.086
11:00 - 12:00	4	12283	0.043	4	12283	0.039	4	12283	0.082
12:00 - 13:00	**4**	**12283**	**0.049**	**4**	**12283**	**0.049**	**4**	**12283**	**0.098**
13:00 - 14:00	4	12283	0.047	4	12283	0.045	4	12283	0.092
14:00 - 15:00	4	12283	0.041	4	12283	0.031	4	12283	0.072
15:00 - 16:00	4	12283	0.039	4	12283	0.037	4	12283	0.076
16:00 - 17:00	4	12283	0.035	4	12283	0.028	4	12283	0.063
17:00 - 18:00	4	12283	0.026	4	12283	0.039	4	12283	0.065
18:00 - 19:00	4	12283	0.024	4	12283	0.016	4	12283	0.040
19:00 - 20:00	1	20400	0.020	1	20400	0.034	1	20400	0.054
20:00 - 21:00	1	20400	0.020	1	20400	0.005	1	20400	0.025
21:00 - 22:00									
22:00 - 23:00									
23:00 - 24:00									
Total Rates:			0.500			0.485			0.985

Using the data from the table above (Page 164 of the Uttlesford Study Trip Generation (*2)) you can calculate the number of OGV movements for a site with 18 hectares dedicated to B8 (storage and distribution) industrial units as follows:

This data is from the **TRICS database** (version 7.9.1), specifically showing the **trip generation rates for warehousing (commercial land use)** based on **OGVs (Other Goods Vehicles) which are also commonly known as HGV's(*4)**. Here's a breakdown of what it all means:

Key Elements

- **Land Use Code**: "02 - EMPLOYMENT/F - WAREHOUSING (COMMERCIAL)" refers to the type of land use being analysed—warehousing facilities where goods are stored and distributed.
- **Multi-Modal**: This indicates that the data includes a combination of transport modes, but this particular table focuses on OGVs (Other Goods Vehicles) such as medium and heavy trucks, also known as **HGV's**.
- **Calculation factor: 100 sqm**: The trip rates are based on 100 square meters (sqm) of Gross Floor Area (GFA). This means that for every 100 sqm of warehouse space, the calculated trip rates apply.

Trip Rate Terminology:

- **Arrivals**: The number of OGVs arriving at the site during each hourly time range.
- **Departures**: The number of OGVs leaving the site during each hourly time range.
- **Totals**: The sum of arrivals and departures during each hourly time range.
- **Ave. Trip Rate**: The average trip rate per 100 sqm of GFA, derived from the observed data.

Time Ranges and Peak Periods:
The table is split into hourly intervals (e.g., **00:00-01:00**, **01:00-02:00**, etc.), and the numbers represent the **average trip rate for arrivals, departures, and total movements** of OGVs during those time periods.

- **BOLD print**: Indicates the busiest or **peak periods**. For example, from **11:00 to 12:00**, the total trip rate is **0.098** OGVs per 100 sqm, meaning it's one of the busiest hours for both arrivals and departures.

Example of Data Breakdown:

- **06:00 - 07:00**:
    - **Arrivals**: 4 observed days, with an average trip rate of **0.035 OGVs** per 100 sqm of GFA.

- **Departures**: 4 observed days, with an average trip rate of **0.041 OGVs** per 100 sqm of GFA.
- **Totals**: Total trip rate during this hour is **0.076 OGVs** per 100 sqm of GFA (sum of arrivals and departures).

Totals Summary:
At the bottom of the table, you see the **Total Rates**:

- **Arrivals**: 0.500 OGVs per 100 sqm of GFA across all time periods combined.
- **Departures**: 0.485 OGVs per 100 sqm of GFA across all time periods combined.
- **Total**: 0.985 OGVs per 100 sqm of GFA in total across the entire day.

Interpretation:

- For every **100 sqm** of warehouse space, there will be **approximately 0.985** OGV trips (arrivals + departures) over the course of the entire day.
- This means that for warehouse space of 18ha which equates to **180,000 sqm**, you'd expect about **1,773 OGV (HGV) trips** in total over the day, with slightly more arrivals (900) than departures (873).

Conclusion:

- UDC's own data suggests there will be an additional 1,773 HGV movements per day at the Takeley North industrial site (Takeley EMP005), yet the UDC report falsely claims the HGV movement numbers on the B1256 are not expected to change! The mitigation plans to route traffic away from the B1256 are not possible, and what happens when the A120 is closed and all traffic is diverted across the B1256!

* https://www.uttlesford.gov.uk/media/13282/Sustainable-Transport-A120-Corridor-Multi-Modal-Study-PUBLISHED/pdf/Transport_Assessment_A120_Model_Outputs_TN409_PUBLISHED_pvr6em025cpb.pdf?m=1725297674550
*2 https://www.uttlesford.gov.uk/media/13286/Transport-Assessment-Supporting-Technical-TN320-Uttlesford-Transport-Study-Trip-Generation-Final/pdf/Transport_Assessment_Supporting_Technical_TN320_Uttlesford_Transport_Study_Trip_Generation_Final.pdf?m=1725463022580
*3 https://www.uttlesford.gov.uk/media/13281/Transport-Evidence-Topic-Paper-PUBLISHED/pdf/Transport_Evidence_Topic_Paper_PUBLISHED.pdf?m=1722947435290
*4 In the Uttlesford Local Plan Regulation 19 consultation, HGVs (Heavy Goods Vehicles) are often referred to as OGVs (Other Goods Vehicles). Both terms are used to describe vehicles that transport goods, but "OGV" typically includes a wider range of vehicles, including both rigid and articulated goods vehicles.

***"Sustainable Transport Local Plan"* falsely refers to Highway Mitigation and junction improvements and M11 Junction 8.**

The Transport Evidence document* specifies that *"there is clearly a need for a long-term solution to address delays which occur at M11 J8"* and that *"local plan development sites would contribute a commensurate amount towards the cost of the scheme"*

There are 2 major errors in the above statements. It is made to look as though M11 J8 upgrades are forthcoming, and the employments sites situated on the B1256 would contribute towards the work which is incorrect.

1. **M11 J8 upgrades are not forthcoming (Reference: 2 Essex FOI).**
2. **There are no further M11 J8 upgrade plans within the Essex Highways Roadmap. (Reference: 2 Essex FOI).**

*https://www.uttlesford.gov.uk/media/13281/Transport-Evidence-Topic-Paper-PUBLISHED/pdf/Transport_Evidence_Topic_Paper_PUBLISHED.pdf?m=1722947435290

Sustainable Trasport Local Plan*1, page 88 specifies:

6.7.10 Potential measures to improve Cycling and Walking are considered below. Detailed discussions will be required with transport authorities to determine the feasibility, develop schemes, funding and deliver the potential measures.

- public transport and active travel connections will be improved between Takeley and Stansted Airport public transport interchange, including improvements along Parsonage Road to improve connectivity for cyclists. This will include new active travel connections through the airport to the transport interchange and will require signalised crossings of road infrastructure at the airport.

Detailed discussions will also have to occur with MAG to determine whether they will consider signalised crossings of road infrastructure at the airport, on their private maintained roads. **Note, MAG have already ruled this out within their comments to Reg 18 so this is highly unlikely to proceed**.

*1 https://www.uttlesford.gov.uk/media/13294/Sustainable-Transport-Local-Plan-Sustainable-Transport-Study-PUBLISHED/pdf/Sustainable_Transport_Local_Plan_Sustainable_Transport_Study_PUBLISHED.pdf?m=1722951258587

Sustainable Transport Local Plan*, mentions Highway Mitigation and junction improvements and M11 Junction 8.

Parking and traffic management	▪ EV car clubs with 2 spaces ▪ EV charge points provided for all houses to enable residents to own and charge their vehicle at their residence. ▪ The highway mitigation and junction improvements that are required in Takeley and Great Dunmow as identified in the transport evidence including appropriate and proportionate mitigation measures at Junction 8. ▪ Smiths Green Lane will be closed to through vehicular traffic at Warish Hall Farm and the route will be prioritised for walking and cycling whilst retaining local access.	▪ Local Plan Sustainable Transport ▪ Shared Transport in New Developments

6.7.11 Other:

- EV car clubs with 2 spaces as proposed by Uttlesford Core Policy 13.
- EV charge points to be provided at the residential and employment allocation sites to facilitate the use of electric vehicles at employment sites.
- The highway mitigation and junction improvements that are required in Takeley and Great Dunmow as identified in the transport evidence including appropriate and proportionate mitigation measures at Junction 8.

Please be aware that no additional M11 Junction 8 upgrades are due or proposed within the current Highways Plan. (Reference: 2 Essex FOI).

*https://www.uttlesford.gov.uk/media/13294/Sustainable-Transport-Local-Plan-Sustainable-Transport-Study-PUBLISHED/pdf/Sustainable_Transport_Local_Plan_Sustainable_Transport_Study_PUBLISHED.pdf?m=1722951258587

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.

Recommended Local Plan Reg 19 modifications.

1. Remove the 18ha employment site Takeley EMP005 from the Local Plan and relocate this to a more sustainable location such as Stansted Northside.
2. Add the site proposed for Takeley EMP005 back into the CPZ.
3. Restrict additional traffic due to developments from the already overused B1256. 1,773 OGV/HGV movements expected daily on the B1256 as part of the Local Plan are unsustainable.
4. Remove all *"safeguarded land"* within MAG boundaries from the Local Plan.
5. Review plan as it seems Takeley are taking the lion's share of Residential & Commercial development across the entire district.

UTTLESFORD LOCAL PLAN
Towards Net Zero Carbon

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)	**X**	**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:

Based on the document we have provided, which highlights issues such as misrepresentation, inaccurate data, and unsustainable transport proposals within the Uttlesford Local Plan, it is clear that participation in the hearing session(s) is necessary for several reasons:

1. ****Clarification and Correction of Misrepresentations****: The document identifies numerous discrepancies in the Local Plan, such as incorrect safeguarded land designations and flawed transport assessments. Attending the hearing will provide an opportunity to present this evidence directly to the decision-makers and ensure that these points are understood and addressed.

2. ****Impact on Local Communities**:** The objections raised, particularly concerning the development of the Takeley EMP005 industrial site, emphasize unsustainable impacts on traffic, flood risks, and overall infrastructure. This participation will be crucial to represent the interests of the affected community and argue for more suitable, sustainable alternatives.

3. ****Engagement in the Plan's Revisions**:** As the document suggests modifications to the Local Plan, including relocation of development sites and traffic management improvements, it is essential to advocate for these changes during the hearing to influence the final version of the plan.

Thus, our involvement is necessary to ensure that our detailed objections and recommendations are fully considered.

(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.*