



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 Policy 12 Countryside Protection Zone

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.

Document E - CPZ

1 The Countryside Protection Zone Policy (S8) emerged to ensure that Stansted Airport remains an airport in the Countryside, i.e.

- *“to ensure no erosion of countryside by coalescing development*
- *no development to be permitted if affects open characteristics of the zone”*

2 A new policy – Core Policy 12 has been designed to replace S8 by a change of wording slightly and by redrawing the boundary of the CPZ.

This has been done in such a way that TAKELEY 005EMP coalesces the airport with residential property and provides no buffer zone to Hatfield Forest – SSSI.

3 In 2016, a study by LUC divided the CPZ into parcels. Parcel 3 is adjacent to the A120, opposite Hatfield Forest, a SSSI and NNR and part of the Flitch Way, a Local Nature Reserve. (Fig1)

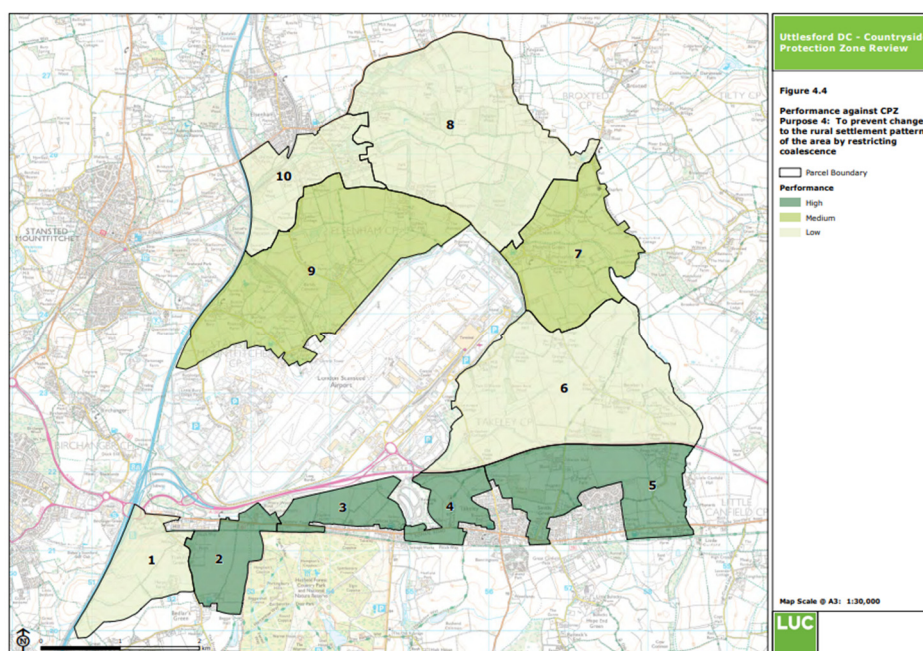


Fig1 TAKELEY 005EMP forms part of parcel 3 within the 2016 LUC CPZ Study

3.1 The LUC Study identified a **high level of harm** should parcel 3 be removed from the CPZ

UDC have removed parcel 3 from the CPZ in the Draft Local Plan despite no substantial evidence to support that decision.

3.2 LUC page 36 recommended “*extending the boundary of the CPZ to Flitch Way to the south of Takeley Street, which would help to prevent further consolidation (sic) of the hamlet and maintain its rural character*”. (Fig2)

There is no evidence to support this direct contradiction of a finding by LUC in 2016 – other than the submission of several “masterplans” by the Developer over a period of years, trying to negotiate major and entirely inappropriate developments on this land. (Fig2)

3.3 LUC further stated “*The parcel plays an essential role in preventing development between the airport and Takeley Street and Hatfield Forest (an important survival of a medieval forest) which lies to the south of the parcel. Any significant new development within the parcel would be likely to result in a perception of merging between Start Hill and Takeley Street that would erode the distinct identity of the village*”.

The new study ignores this finding, providing no sound evidence to remove this parcel of land from a re-defined CPZ. The only convincing evidence for its removal is continued speculative developer pressure – see para 4.2.4 below.

4. To prevent changes to the rural settlement pattern of the area by restricting coalescence	High
The parcel plays an essential role in preventing development between the airport and Takeley Street and Hatfield Forest (an important survival of a medieval forest) which lies to the south of the parcel. Any significant new development within the parcel would be likely to result in a perception of merging between Start Hill and Takeley Street that would erode the distinct identity of the village.	
Consideration of alternative CPZ boundaries	
Consider extending the boundary of the CPZ to Flitch Way to the south of Takeley Street, which would help to prevent further consolidation of the hamlet and maintain its rural character.	

Fig2 LUC 2016

4 The Draft Local Plan CPZ

4.1 Page 99 of the LP document discusses Policy 12 – the new Countryside Protection Zone Policy.

4.2 Para 6.4.8 states:

“this Plan is seeking to support sustainable development, thus it is important that any strategic housing and employment development is located where they reduce the need for travel and maximise opportunities for sustainable travel choices, such as walking, cycling and public transport.

4.2.1 This site will not support sustainable travel for a number of reasons explained in our Document B Employment Part 1 and Part 2, Document C Transport and Document D Flitch Way.

4.2.2 UDC have allocated 18ha of B8 employment land in Parcel 3 – Land North of Taylors Farm, Takeley Street. This 18ha (27ha overall site) is a “technical oversupply”. It is not needed.

Given the very low rate of unemployment in UDC, the 1600 jobs suggested in a previous Master Plan (see our Ref3 Pigeon-Birchanger Hall Farms) and the lack of evidence of the ability to provide safe cycling and walking routes (see our Document D Flitch Way) the reality is that this site will lead to an increase in vehicular travel for those working there. (see our Document C Transport).

4.3 Para 6.4.8 states: *“a review of the original CPZ reveals substantial change has occurred in the area since 1995 and that the effectiveness of the CPZ has been mixed”*

This is in a large part due to the failure of UDC to establish a 5 year housing supply leading to speculative development. UDC gave little weight to its own CPZ policy when making a number of planning decisions. The effectiveness has been “mixed” because of their own poor decision making.

4.4 Para 6.4.8 states: “the CPZ area is amended to ensure the rural setting of the Airport continues to be protected, including the expansion of the original CPZ”.

This statement is misleading:

UDC have NOT expanded the original CPZ.

- UDC have “amended” the CPZ area to include Hatfield Forest – a SSSI and NNR, owned by the National Trust. This area is already protected. It cannot be developed.
- UDC have included an operational landside area of Stansted Airport in its re-defined CPZ – the Balancing Ponds – ponds C owned by MAG. The area contains a pumping station, ponds and manages the airfield surface water runoff, and would likely need developmental work as passenger numbers increase, (see para 8.6 2024 CPZ review “8.6 The open land associated with basins between the B1256 and the A120 would be moved into the CPZ (it is currently excluded)”. This land had always been excluded from the CPZ for a reason (Fig3).
- UDC have safeguarded land for A120 access from the Takeley 005EMP site that is both in the current and the proposed CPZ. In other words, they have allocated a part of the CPZ to build a road to take traffic from a distribution site which would include lorries, although the land still appears in the CPZ in the plan. This would imply an intention to further erode the CPZ and potentially expand this employment site. (see our Document C Transport)
- In their mitigation strategy, UDC have included road widening and traffic lights at Tile Kiln Green, adjacent to an area of CPZ. The footway is not wide enough to widen the road and if this mitigation strategy is put in place, this part of the CPZ will need to be purchased from the land-owner and removed from the CPZ.

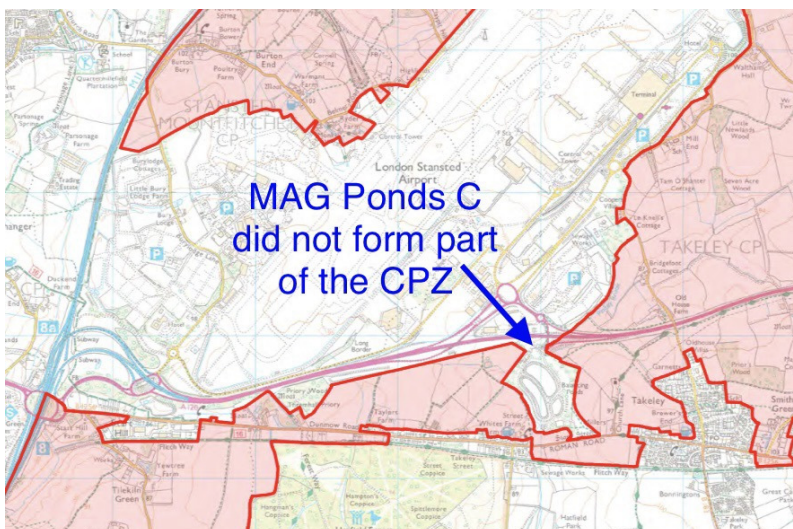


Fig3
MAG (landside)
Ponds C are not in the
current CPZ

5 Para 6.4.8 states “to ensure the countryside setting of the Airport continues to be protected in light of development already permitted, but that the sustainable development set out by this Plan is removed from the CPZ area”.

5.1 What this means is that an 18ha Distribution site has replaced a critical parcel of the CPZ and the policy has been reworked to fit the Developer submission (a Developer has bought an option on the land). The Developer has submitted a number of “master plans” over the years (Fig4) that have been declined because the land is within the CPZ. This latest policy simply removes one of the hurdles for the Developer. The proposal is not sustainable. Its removal damages the countryside setting of the airport (Fig5,6)

5.2 Our response in Document B (Employment Part 1 and Part 2 Case Study, Land North of Taylors Farm) outlines why this land is entirely unsustainable and the numerous constraints. Document F (Alternatives) demonstrates that UDC have not properly considered Alternatives and Document D demonstrates the unacceptable pressure on Hatfield Forest.



Fig4
Previous Master Plan
Submission



Fig5,6
Industrialisation on this scale so close to the airport and an SSSI signifies the destruction of the Countryside and potential irreversible demise of Hatfield Forest

(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.

Modifications

1 Return the CPZ to the same model as the 2016 Study but include the Flitch Way section adjacent to Takeley Street.

2 Strengthen the policy wording to give it more weight should UDC:

- fail to meet its 5 year housing supply
- need to defend a planning appeal because of weighting given to the CPZ

(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.