



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

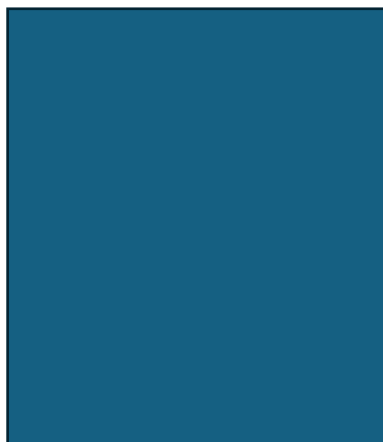
1. Personal Details*

**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 4 - Meeting Business and Employment Needs

Core Policy 10 – South Area Strategy

Core Policy 12 – Countryside Protection Zone

Core Policy 38 - Sites 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 71 - identifying alternative deliverable sites that are in general accordance with the **Spatial Strategy** of the Plan

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 F Alternatives

The Plan is unsound because it has failed to properly consider **alternatives** when considering strategic allocation of employment sites.

The NPPF requires that plans are: “*Justified – an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence.*”

Employment Land

The Sustainability Appraisal para 5.5.12 states “*Finally, with regards to **employment land** allocations,the combined effect is a modest oversupply in respect of industrial/logistics but it is not possible to envisage any reasonable alternative*”.

We disagree. This is not the case for employment allocations in South Uttlesford near Stansted Airport as demonstrated below.

1 UDC has allocated around 70% of its employment sites close to Stansted Airport.

2 UDC has weighted allocations to this area without properly considering the overall consequences for the rest of Uttlesford, particularly the Northern part of the District, the Cambridge corridor and Gt Chesterford.

3 A specific example of the failure to properly consider alternatives is evidenced in the Reg18 correspondence from Threadneedle Curtis Ltd (Our attachment Ref1 Threadneedle) asking why land identified as Stansted 025 EMP (additional land at Stansted North) put forward in the call for sites was not considered (See Fig1 & Fig 2 below). Our understanding from a telephone conversation with one of the authors of this document was that Uttlesford were “not interested” in talking to them.

3.1 An additional site ‘Tocher house including land to the north and west of Start Hill’ was submitted by Threadneedle together with the land at Stansted North. Stansted 025 EMP and Tocher House are brownfield sites with existing infrastructure including direct access to strategic road networks (SRN), cycle tracks and footways. A further cycle route extension and highway improvements relating to the committed (UTT/22/0434/OP) Northside site are underway which is also conveniently situated between Stansted village and Stansted Airport railway stations. The infrastructure is in place with upgrades unnecessary to make this potential allocation deliverable. These sites do not have heritage assets, nor are they in a residential area. They are deliverable with very little or no constraints. They have direct access to the M11 and A120 without the need to impact any local villages.

4 There is no indication why alternative sites were not considered especially when the Uttlesford Employment Land Report para 2.34 makes specific

recommendations concerning employment land north of Stansted “*the encouragement of development and relaxation of restrictions around the Stansted Airport boundary, particularly at the Northern Ancillary area*”. Para 2.39 further states “*further industrial and business space should be considered for allocation in the area beyond Northside*”. Para 2.4.4 “*there is a particular need for supply in close proximity to J8 M11*”.

Note: Whilst not necessarily seeking to recommend the sites below, there is no evidence that they have been fully considered and no reasons given for their rejection, despite the fact that they are consistent with the Employment Land Report, are sustainable and readily available. They are deliverable in the short term without infrastructure upgrades.

4.1 Land North of Stansted Airport (Stansted 025 EMP)

- Put forward in the call for sites, the site is almost 104ha of which 62ha already has permission (UTT/22/0434/OP), it includes non-airport related employment use.
- Suitable infrastructure is already in place with direct access to SRN (Core policies 26, 28, 32)
- Conveniently situated between Stansted Mountfitchet and Stansted Airport railway stations
- Does not impact on any residential area
- Is not in the existing CPZ
- Predominately brownfield land
- Deliverable and sustainable with very few constraints,

4.2 Tocher House and adjacent land CM22 7TA representing 2ha of brownfield land

- Promoted in the call for sites process but not assessed as part of HELAA, with no reasons given
- Developer requested at Reg18 the HELAA is updated to include the site at Reg 19.
- Direct access to SRN
- Is not in the existing CPZ
- Already adjacent to designated cycling route 16 and footpaths (Core Policies 28 and 30) with direct safe-access to Stansted Airport
- Deliverable and sustainable

Attachments:

Ref 1 Threadneedle

Fig1

Housing and Economic Land Availability Assessment Summary of Sites

Stansted 025 EMP - Stansted Northside, First Avenue, Stansted Mountfitchet, CM24 1RY



Settlement:	Stansted	Source:	Call for sites
Site History: UTT/22/0434/OP pending. Outline application for demolition of existing structures and redevelopment of 61.86Ha to provide 195,100sqm commercial / employment development predominantly within Class B8 with Classes E(g), B2 and supporting food retail/ food/beverage/nursery uses within Classes E (a), E(b) and E(f) and associated access/highway works, substation, strategic landscaping and cycle route with matters of layout, scale, appearance and other landscaping reserved			
USAGE:		Existing use:	Airport related uses
CAPACITY:		Proposed use:	General employment use including logistics
Area (ha):		103.53	
Housing assumed capacity:		0	
Employment floorspace (sqm)		414120	



Suitability Criteria

National Constraints

Land Classification	Brownfield	Settlement Development Limits	GREEN
----------------------------	------------	--------------------------------------	-------

Local Policy Constraints

Green Belt	GREEN	Countryside Protection Zone	AMBER
Public Safety Zone	GREEN	Important Woodland	AMBER
Special Verge	GREEN	Protected Lanes	GREEN
Historic Park and Garden	GREEN	Protected Open Spaces	GREEN
Neighbourhood Plan Designation	No		

Flooding

Fluvial Flood Risk	GREEN	Groundwater Flood Zone	GREEN
Surface Water Flood Zone	GREEN		

Pollution

Aircraft Noise Contour	AMBER	AQMA	GREEN
Groundwater Source Protection Zone	GREEN	Waste Consultation Area	GREEN

Natural Environment

SSSI	GREEN	SAC, SPA and RAMSAR	GREEN
National Nature Reserve	GREEN	Local Wildlife Site	AMBER
Priority Habitat	AMBER	Ancient Woodland	GREEN
Local Geological Site	GREEN	Right of Way	GREEN
Landscape Sensitivity	GREEN	Heritage Sensitivity	AMBER
TPO	GREEN	Hatfield Forest Zone of Influence	AMBER

Fig 2

Essex Coast RAMS Zone of Influence		GREEN	
<i>Historic Environment</i>			
Scheduled Monuments	GREEN	Archaeological Sites	GREEN
Listed Building	GREEN	Locally Listed Buildings	GREEN
Conservation Area	GREEN	Registered Parks and Gardens	GREEN
<i>Highways and Access</i>			
Highways	AMBER		
<i>Conclusions</i>			
Suitability	The Site is considered suitable.		
Availability	There are no known availability issues on site.		
Achievability	The site is likely to be achievable, subject to overcoming identified constraints.		
Site Classification	B: Have potential to demonstrate suitability, availability, and achievability within 5-15 years.		

(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.

Modification:

1 Consider alternative sites.

2 Evidence why alternatives were not considered.

Eg. Uttlesford should properly explain why additional land at Stansted Northside and Tocher House were not considered. Reference to them being brownfield sites should be included.

3 Consider Levelling Up

- Distribute Employment Opportunities across Uttlesford and realign the **overall** weighting that is currently biased towards Stansted Airport, already Uttlesford's largest employment site
- Consider more focus on knowledge industry and related forward looking industries where future growth is likely to be.

4 Remove the allocation North of Taylors Farm as an employment site. Reason: not sustainable. The site has numerous constraints. (See our Document B Employment and Case Study)

5 Reinstate Land North of Taylors Farm in the **CPZ**
(See our Document E CPZ)

6 Replace the allocation North of Taylors Farm in part with some of the brownfield land identified above and in part with land in the Northern part of the district **if necessary**. The plan acknowledges the allocation of an oversupply of industrial land

Attachments:

Ref 1 Threadneedle (This was a response to UDC at Reg 18 but we wish to submit this as supporting evidence at Reg 19).

(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.