

Uttlesford District Council

Representations to the Uttlesford Local Plan (Issues and Options) Regulation 18 Consultation

Response on behalf of Pigeon (Takeley) Ltd and Birchanger Hall
Farms Ltd

April 2021

Contents

1.	Introduction	1
2.	Theme 7 – Local Economy	3
Appendix 1: Site Location Plan		7
Appendix 2: Concept Masterplan		8

1. Introduction

- 1.1 These representations have been prepared by Pigeon Investment Management Ltd ('Pigeon') on behalf of Pigeon (Takeley) Limited and Birchanger Hall Farms Ltd ('the Landowners') in response to the Uttlesford District Local Plan (Issues and Options) Regulation 18 Consultation (April 2021). Pigeon has an interest in a 27 ha site, located directly south of London Stansted Airport and west of Takeley within Uttlesford District. The aim of these representations is to assist the Council in formulating their Local Plan, having particular regard to new strategic employment opportunities around Stansted Airport. The land within Pigeon and their Landowners' control encompasses the Site as shown on the Location Plan attached at **Appendix 1**.
- 1.2 The Land north of Taylors Farm, Takeley Street (the 'Site') presents an opportunity to deliver a state-of-the-art employment and logistics hub close to the A120 and M11 and within Uttlesford's most important economic growth area, the London-Stansted-Cambridge Corridor.
- 1.3 A Concept Masterplan has been prepared in support of these representations, showing how the Site could be developed. The Site is available immediately and free from any technical constraints including flood risk (it is within Flood Zone 1), ecology, highways and heritage, which would preclude the early delivery of the proposed scheme. A copy of the Concept Masterplan is provided at **Appendix 2**.
- 1.4 The benefits for bringing the scheme forward include the following:
- An important strategic employment opportunity, close to Stansted Airport, the M11 and A120 to deliver much needed high quality employment space (distribution and light industrial).
 - A well-considered Concept Masterplan showing that the Site can deliver around 80,000sqm of employment space in 13 modern light industrial and warehouse and distribution units with access off Dunmow Road (B1256);
 - Excellent connections to the strategic road network. Site benefits from direct access onto the B1256 linking to the west with Junction 8 of M11, providing connections to London and Cambridge. From Junction 8 employees and visitors can also gain easy access to the A120 providing connections to nearby towns of Great Dunmow and Braintree;
 - A well located and largely visually enclosed Site that is screened by the A120 to the north, the B1256 to the south and its associated properties and established areas of woodland to the east and west;
 - Opportunities to promote on-site biodiversity gain by maintaining and enhancing existing green infrastructure. Provision of new habitats including significant new tree planting;

- A comprehensive landscape strategy that responds to the local area and its visual context. A number of green spaces and walking routes will be created to increase recreational opportunities for site occupants and visitors.
 - Incorporate a sustainable drainage system which will discharge surface water in line with the drainage hierarchy and national and local planning policy;
 - New and improved footpaths, cycleways, connecting people and places; and
 - High quality commercial spaces that will meet the Future Buildings Standard.
- 1.5 The consultation has been split into nine different themes. The remaining part of the report sets out responses to the questions raised in relation to Theme 7 'Local Economy'.
- 1.6 We would be pleased to discuss any aspect of these representations in more detail if this would be of assistance to the Council.

2. Theme 7 – Local Economy

What kind of businesses should we attract to Uttlesford? How can we support businesses to grow and create new jobs in Uttlesford?

- 2.1 Uttlesford District is an important strategic location in the East of England, central to the London Stansted Cambridge Corridor economic growth area.
- 2.2 Uttlesford already possesses a number of important economic strengths on which to build. The District has a well-qualified resident population with a higher proportion of employed residents in more senior positions than the UK average. In addition, to benefit being home to one of the UK's main airports, the District has an expanding life sciences sector which is part of the well-established London Stansted Cambridge Corridor.
- 2.3 The rate of unemployment in the District is lower than the national average (2.2% for the District compared with 5.1% for England)¹. London Stansted continues to generate significant employment for the residents of Uttlesford and surrounding areas. Based on 2019 ONS data, 20.9% of Uttlesford's population is employed in the 'Transportation and Storage' sector. This is significantly higher than any other industry in Uttlesford, with the second highest 'Wholesale and Retail Trade' employing 11.6% of the population.
- 2.4 The pandemic has created a very challenging economic environment. However, with its locational advantages, significant potential still exists to attract more investment into the District. In terms of future jobs growth, the most recent assessments of employment needs were undertaken to inform the previous Regulation 19 Submission Local Plan (2019). The October 2017 West Essex and East Hertfordshire Assessment of Employment Needs, assessed two potential growth options in relation to jobs growth in Uttlesford District over the Local Plan period. The preferred scenario proposed in 2019 Draft Local Plan equated to 727 jobs per annum (16,000 jobs over the Plan period).
- 2.5 In terms of employment land requirements, the Regulation 19 Submission Local Plan (2019) stated that the net requirement for industrial land equated to 10.2ha under a medium scenario. The Council's employment policies were informed by the Employment Land Review 2017 (ELR) undertaken by Aecom. The 2017 ELR was based on the East of England Forecasting Model (EEFM) published in 2015. Since that time at least two further versions of EEFM have been published, one later in 2017 and then EEFM 2019 (dated August 2020). Indeed, the 2017 West Essex and East Hertfordshire Assessment of Employment Needs Study found a higher level of need than the Aecom ELR recommending a requirement for circa 22ha of industrial land.
- 2.6 Whilst the pandemic has had a significant impact on the aviation industry in terms of passenger numbers, the cargo side of London Stansted has continued to operate with cargo volumes making it the 3rd largest cargo airport in the UK.

¹ Official Labour Market Statistics, Nomis, 2019

- 2.7 This is only likely to have been fuelled by the events of 2020 which is widely acknowledged as an exceptional year for warehousing and industrial activity driven by increases in e-commerce and distribution.
- 2.8 Yet despite this, London Stansted has the lowest quantum of existing industrial and warehouse floorspace located within its 2 mile radius when compared to other major airports. Uttlesford overall has the lowest level of industrial floorspace in its property market area (comprising Uttlesford, Hertford, Harlow and Epping Forest) representing only 15% of total stock. Furthermore, it has incredibly low vacancy rates (0.6%) against an ideal vacancy rate of 8%.
- 2.9 Moving forward it is clear that growth in the logistics sector needs to take front and centre within Uttlesford's emerging economic strategy. To drive forward economic growth, Pigeon would urge the Council to adopt a supportive policy framework and identify sufficient industrial land to positively meet the needs of this sector.
- 2.10 The main sources of industrial supply in the Regulation 19 Submission Local Plan (2019) were current permissions (reportedly around 29,000 sqm of which 18,000 sqm was expected to be delivered in the early part of the plan) the Garden Communities and the North Stansted Employment Area (SEA).
- 2.11 A concern raised by the Inspectors examining the Regulation 19 Submission Local Plan (2019), was the lack of information about where in the Garden Communities employment uses would be provided and more importantly when they would be delivered. To support Uttlesford's economic recovery it is important that the Council have a clear strategy in place for identifying the land required to deliver sufficient warehouse and distribution space throughout the entirety of the Plan period.
- 2.12 We would suggest that the previous spatial strategy and its reliance on the North Stansted Employment Area to deliver a significant amount of employment land should be re-considered. Despite being identified for allocation in the Regulation 19 Submission Local Plan (2019), no progress appears to have been made with this area in recent years and no up to date evidence detailing when this site is likely to come forward for development.
- 2.13 The previous spatial strategy relied on Garden Communities and the North Stansted Employment Area to deliver a significant amount of warehouse and distribution space over the Plan period. For the reasons set out above, Pigeon would question the deliverability of employment space in these locations. Given how critical the logistics sector is to the local economy, especially at this time of wider economic uncertainty, Pigeon strongly urge the Council to formulate a strategy that identifies a wider variety of employment sites, such as Land north of Taylors Farm, for new warehousing and industrial space.
- 2.14 The Site at Takeley Street is available immediately and can deliver around 80,000sqm of modern light industrial and warehouse and distribution space, with excellent access to Junction 8 of the M11. The Site is well screened and provides significant opportunities for new landscaping, particularly along the frontage with Dunmow Road, which will also bring about ecological enhancements. The proposals will represent a significant

investment in the local economy and could generate approximately 1,600 on-site jobs and a further 400 jobs during construction.

- 2.15 For the reasons set out above, the allocation of this Site will support the Council's aspirations for the economy as it will support businesses to grow and create new jobs in Uttlesford.

How can the Local Plan support sustainable travel for key commuting routes?

- 2.16 The 2011 Census of Population provides the most accurate data on travel to work patterns. This indicates very large flows of workers into and out from Uttlesford for work. More than 18,000 Uttlesford resident workers leave the District for work. That equates to 44% of all resident workers in the District. Some 17,600 workers travel into Uttlesford to fill jobs in the District. This equates to 43% of all Uttlesford based jobs being filled by workers from outside the District.
- 2.17 To achieve a sustainable balance between jobs and homes, it is important that local authorities plan positively to meet both housing and economic needs. More recent versions of EEFM suggest a greater rate of employment in warehousing sectors, which is likely to increase the overall need for floorspace and land. To reduce levels of out-commuting the Council should be identifying new warehouse and distribution hubs, such as the Land north of Taylors Farm.
- 2.18 This Site is ideally located close to J8 of the M11 and A120 corridors, and has the benefit of a frequent bus service every 30min between Harlow and Stansted with stops outside the Site frontage running from around 7am to 7pm. This in turn provides access to excellent train services.
- 2.19 The allocation of sites on key commuting routes will be key to encouraging sustainable travel and in turn reduce out-commuting. On this basis we strongly urge the Council to allocate the Land north of Taylors Farm, which once fully developed, will bring significant employment opportunities and strengthen further the area's economic growth

How can the Local Plan support the economic recovery following the COVID-19 pandemic?

- 2.20 As stated above the pandemic has placed Uttlesford, as it has the rest of the UK, under economic pressure. Arguably the aviation industry has been the most impacted. However, logistics has been one of the most resilient sectors during this pandemic, with 2020 widely acknowledged as an exceptional year for warehousing and industrial activity driven by increases in e-commerce and distribution.
- 2.21 To aid economic recovery following the pandemic the Local Plan needs to allocate a sufficient range of sustainable employment sites to support economic growth. The Site at Takeley Street has excellent credentials for strategic commercial development taking account of its proximity to Stansted Airport and the M11 corridor. It can be expected that the proposals would be very attractive to the market and other schemes in the vicinity have been successfully pre-let.

- 2.22 The Site itself is well screened and the impact of the proposed scheme on the wider site area would be largely contained by the existing and established physical features of the Site, including the existing road network as well as other elements such as the landform and green infrastructure.
- 2.23 A Concept Masterplan, a copy of which is provided at **Appendix 2**, has been prepared in support of these representations, showing how the Site could be brought forward. The scheme would deliver around 80,000sqm of light industrial and warehousing space amongst a network of green infrastructure, including new walkways and significant tree planting. This would provide opportunities for amenity, landscape and biodiversity enhancements.
- 2.24 The most important role the Local Plan can play to support the economic recovery following the COVID-19 pandemic is to plan positively for the District's economic needs and in particular the needs of the warehousing and distribution sector. This means allocating sufficient sites, such as the Site at Takeley Street, to maximise opportunities for growth and investment.

Appendix 1: Site Location Plan

Appendix 2: Concept Masterplan

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