

SOCIO ECONOMIC COMMENTS & OBJECTION

Planning Application:
Land North of Taylors Farm

Application Reference:
UTT/25/2786/OP

Local Planning Authority:
Uttlesford District Council

Submitted by:

Takeley Street Action Group (TSAG)

A local residents' action group representing +600 residents of Takeley and neighbouring towns and villages.

This document forms part of a coordinated set of technical objections submitted by TSAG in response to the above planning application.

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This representation is made in the public interest and is intended to assist the Local Planning Authority, statutory consultees and members of the Planning Committee in reaching a lawful, informed and sound planning decision.

**Environmental Statement - Socio Economic – Comments on behalf of
Takeley Street Action Group**

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Environmental Statement - Socio Economic – Comments on behalf of Takeley Street Action Group

1. Executive Summary

1.1 This document sets out to examine the “Environment Statement – Socio Economics” submitted by the Pegasus Consultancy to support the Planning Application for Land North of Taylors Farm by Pigeon.

The credentials of authors of this document submitted by TSAG include detailed project reviews for the European Commission, Horizon 2020 programme.

1.2 Close scrutiny of the “Environment Statement – Socio Economics” concludes that the document:

- claims that baseline data is “*collated and presented from a range of sources*” (Section 5.2.17) but fails to disclose that range of sources.
- includes claims of economic benefits that are inflated as they include cumulative figures from other developments.
- is seriously flawed because it fails to properly take Local Amenity (including population) or Human Health into account.
- pays no attention to other major similar local schemes beyond the UDC boundary – eg: the area in Bishop’s Stortford near Junction 8.
- is not a requirement of the UDC Scoping Opinion but seeks to replace key aspects of the SO, ie. human health and population.
- contains multiple errors and thus lacks credibility.

2. Introduction

2.1 The Socio Economic statement appears to be an attempt by the Developer to justify a large employment site in an unsustainable location in the hope that their document will help the application to carry significant weight. The Consultant “Pegasus” in their online profile claim that their role is to “*complement*” the Planning process and emphasise the “*positive things*” of planning applications, hence it cannot be considered an objective document nor a substitute for the detail required by the SO.

The author’s assertion that it is not necessary to produce separate documentation about population and human health (para 5.2.16) as required in the UDC Scoping Document is unacceptable. Their Socio Economic statement will not suffice as it is totally inadequate. (See below for more detail).

2.2 Decision makers should not be put in the position of basing their judgement on inadequate or misleading information provided by

Developers as has happened in Wigan (Astley). This has resulted in significant adverse press and TV coverage with Councillors feeling obliged to stand down. A recent Daily Mail¹ article concerning the Wigan development also focussed on the Takeley submission.

Details within this and indeed any submission should be both factual and accurate nor should key data be missing?

2.3 Table 5.2.3 of the Socio Economic submission claims that the disturbance to Neighbourhood Amenity will have negligible effects during the two year construction phase **and fails to mention AT ALL the major effect on Neighbourhood Amenity during the lifetime Operational Phase?**

Disturbance to neighbourhood amenity	Potential disturbance to local people as a result of construction activities	Temporary	Medium	Low	LPA	Minor to moderate adverse	CEMP	Negligible (not significant)
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2.4 Attention is drawn to the refusal of a significantly smaller but similar application approximately one mile away **s62A/2023/0017** (UTT/23/0950/PINS) by the Planning Inspectorate: “.....*the proposal would give rise to material disturbance to occupiers of surrounding properties which would amount to a moderate level of harm. It is, therefore, contrary to Policy GEN4 of the LP which sets out that development and uses, whether they involve the installation of plant or machinery or not, will not be permitted where noise or light would cause material disturbance to occupiers of surrounding properties. It would also be contrary to Paragraph 130 of the Framework which sets out that planning decisions should ensure that developments will function well and add to the overall quality of the area, not just for the short term but over the lifetime of the development and create places that promote health and well-being*”.

The Planning Application cited above was next to the M11 J8 and affected a much fewer number of residential dwellings in comparison to this proposal. It is therefore unclear how the Developers can conclude that “*there are no significant adverse effects identified as a result of the Proposed Development*”.

2.5 In their efforts to persuade decision makers to view this proposal positively, **the Developer has completely ignored the conclusions of its own consultants.**

Eg: Landscape and Visual Document (Liz Lake Associates) submitted by the Developer:

¹ <https://www.dailymail.co.uk/news/article-15352071/supersheds-bigger-warehouses-views-UK.html>

- Para 6.4.23. *“During the construction phase, the Proposed Development is considered to result in a Major magnitude of change and a **Major Adverse (significant) effect**”.*
- Para 6.4.103 *“The Proposed Development is considered to result in a **Major** magnitude of change and a **Major Adverse (significant) effect**. **Effects are considered to be direct, permanent and long term**”*
- Para 6.4.137 sums up the situation as follows *“Upon scheme completion, the new landscape proposals will have little softening effects. Therefore, **it is considered that the Proposed Development will result in a Major magnitude of change and a Major Adverse (significant) effect. Effects are considered to be direct, permanent and long term**”.*

There are multiple other examples that could be cited including erroneous and missing data, some of which are cited in the submissions by Takeley Street Action Group, available on the Planning Portal.

3. Construction Environment Management Plan (CEMP)

- 3.1 Para 5.5.4 wrongly claims: *“Following the implementation of a CEMP, effects on disturbance to neighbourhood amenity/wellbeing during the construction period are considered to be negligible (not significant). Once operational, significant beneficial effects are expected to in relation to job creation and contribution to economic output”.*

This statement **deliberately conflates the claimed economic benefit with direct loss of neighbourhood amenity/wellbeing when they are entirely separate matters**—Potential jobs opportunities do **NOT** cancel the harm to amenity and wellbeing.

- 3.2 In terms of the CEMP, the Developer’s Socio Economic statement once again contradicts the Developer’s own findings in their Landscape and Visual document which states at section 6.4.103 *“At scheme completion, views from rear windows and external spaces to the rear of residential and business properties on B1256 (The Street / Dunmow Road) will look towards a newly planted landscape scheme with prominent views of new built form within the Site. As such, there will be no change from effects that have arisen during the construction period. The Proposed Development is considered to result in a **Major** magnitude of change and a **Major Adverse (significant) effect. Effects are considered to be direct, permanent and long term**”.*

In other words the implementation of a CEMP will **NOT** result in effects that are **“not significant”**

4. Health and Wellbeing

4.1 Page 15 of the UDC Scoping Opinion states that Population and Human Health should be scoped into the Environmental Statement. The Developer has opted not to do this. Para 5.2.16 states “.....*the impact of the Proposed Development on People and Communities. Given the considerable overlap between this topic and socioeconomics, a separate chapter on People and Communities has not been produced*”.

4.2 Although passing reference has been made to People and Communities in the Developers Socio Economic submission, this approach is entirely inadequate and does not fully reflect the requirements of the UDC Scoping Opinion

5 Disturbance to Neighbourhood Amenity (Section 5.1.3-5.4.16)

5.1 Potential disturbance to Neighbourhood Amenity is critical as noted in para 2.4 above where a similar but smaller planning submission was declined by PINS on these grounds. The topic deserves serious and detailed attention, but merits less than one page.

The proposed site is located adjacent to a residential area with access points directly opposite residential properties where **significant loss of amenity in terms of noise, vibration and light** are anticipated.

5.2 Whilst headed “Disturbance to Neighbourhood Amenity” this section (5.4.13) talks about claimant count and jobs growth which has nothing at all do to with Neighbourhood Amenity.

5.3 When the section finally deals with Neighbourhood Amenity in three short sections, it considers the construction phase and ignores the operational phase.

Its conclusions are flawed and not evidence based. Examples are:

- Para 5.4.14. “*The accompanying Air Quality Assessment concludes there is not likely to be any significant or detrimental impact on air quality as a result of the Proposed Development*”, **when in fact the National Trust has objected on these grounds**. The Developer has in fact been dismissive and claimed that the NT has “*set the bar too high*”.
- Section 5.4.14: “*Noise effects – During construction, there would still be a potential for adverse short term impacts during certain operations*”. Richard Fenton (Consultants) has stated in his report that noise **would likely exceed WHO guidelines**, eg “*No consideration has been given to the impact of noise levels from HGVs inside the closest receptors. It is*

likely that the noise levels from HGV movements, inside the closest bedrooms, would exceed noise guideline levels for sleep disturbance”.

The long term impacts on human health and the wellbeing of local residents, particularly mental health is likely to be significant.

The Developer should submit clear separate chapters on Population and Human Health. Without these, the Scoping Criteria set down by UDC have not been met and the **application should be refused**.

6. Socio Economic Conditions

- 6.1 The Developer claims that their document “*determines the baseline socio-economic conditions and considers the likely socio economic effects of the Proposed Development. The considerations of this chapter are mostly related to the effects of the Proposed Development on the human population who will live in the vicinity of the Site*”.

The document has little bearing on those “*who will live*” in the vicinity of the site. “*Vicinity*” in this context is not defined. There is no indication of distance, whether they refer to local villages or even nearby towns such as Bishop’s Stortford – in Hertfordshire not Uttlesford. The author cannot conceivably see the future and know “*who will live*” in the undefined vicinity. House prices, unemployment and skill sets are relevant and dealt with below.

- 6.2 The Developer’s document focuses on areas 006A and 006B and talks about deprivation, but Uttlesford is not a deprived area. Uttlesford’s own “Health and Wellbeing Strategy 23-28²” (dated 2019 but current) makes it clear that Uttlesford has a “*generally affluent socio-economic profile*”.

The Health and Well Being Strategy is a key document²This is not referenced at all but is aligned to numerous local plans and strategies²

7. Methodology (page 1 of 32 Socio-Economics EIS document)

- 7.1 The Conclusions in the Developer’s document will inevitably be heavily influenced by the “methodology” (Section 5.2). This is not a recognised methodology. The author recognises that “*the assessment is quantitative where possible. In circumstances where this is not possible, the assessment is **qualitative in nature and based on professional judgement***”.

This is **NOT** a methodology.

² <https://www.uttlesford.gov.uk/article/8253/Uttlesford-Health-and-Wellbeing-Strategy-2023-2028>

7.2

Key points of note:

The “*assessment is quantitative where possible*”. There is no evidence of any quantitative research. It is very limited Desk Research using one quantitative source only – the ONS.

- Para 5.2.1 states: “*There is no specific guidance available which establishes a methodology for undertaking socio-economic effects of a Proposed Development in the context of an EIA*”. This should not be an excuse for an inadequate strategy or flawed “so-called” Methodology, used to put forward alleged findings that cannot conceivably carry any weight.
- The indices of Multiple Deprivation are out of date. 2019 is used when 2025 is available. More to the point, the area is NOT considered deprived.
- Information provided by the Applicant is cited as a source in their methodological approach, but no detail is provided at all so that it cannot be verified. Surveys, questionnaires, in depth interviews etc would have been expected as a minimum.

8. Criteria for Magnitude of Change (page 3 of 32 Socio Economics)

8.1 This can be considered as part of the so called “Methodology.” Para 5.2.6 is of concern. “*Wherever possible the magnitude of change will be quantified. Where this is not possible, consideration of magnitude of change will be on a qualitative basis and justified through baseline research, a review of relevant policy, and consultations undertaken*”.

- There is no evidence of “*baseline research*”.
- There is no indication of what “*relevant policies*” are.
- There is no indication of what “*consultations undertaken*” took place and where can the evidence be found.

8.2 Whilst qualitative research has a number of recognised strands, professional judgement is not one of them and there is no substantive indication of how this (*research*) has been developed or applied, nor is there any background data to substantiate this approach.

In other words, the methodology and conclusions are subjective with no Scientific basis, lack evidence and are open to challenge.

Conclusions are therefore not robust and do not provide a sound foundation for decision making²

9. Housing, affordability and population

9.1 Claims have been made by the Developer concerning the number of potential employees at the site who will likely live in Takeley. They propose circa 5%, the principle being that these individuals will live close enough to avoid using a car. Transport flows are in part based on this figure. Regardless of the %, the most likely scenario is that the majority of employees will commute by car. This would have a detrimental effect on climate change and net zero policy. It would also impact on any potential beneficial impact to Uttlesford.

9.2 On a simplistic level, there are four main reasons why the majority of employees are more likely to commute:

- House prices
- Earnings
- Skill sets
- Numbers unemployed in Uttlesford

9.3 House Prices

House Prices: “The majority of properties sold in Uttlesford during the last year were detached properties, selling for an average price of £685,759. Semi-detached properties sold for an average of £459,209, with terraced properties fetching £375,135”.³

- Average House price in Takeley £477k⁴
- Average House price in Bishops Stortford £478k⁵
- Average House Price Harlow £351k⁶
- Average House Price Braintree £334k⁷
- Average House Price in Uttlesford (ONS⁸) in 2025 £478k.

9.4 Rental property in the area is at a premium, partly because of the number of airport workers, many on shifts and some seasonal. Hence the option of rental for temporary construction workers is likely to be limited. Average monthly rental in 2025 (ONS⁹) £1286.

³ <https://www.rightmove.co.uk/house-prices/uttlesford.html>

⁴ <https://www.rightmove.co.uk/house-prices/takeley.html>

⁵ <https://www.rightmove.co.uk/house-prices/bishops-stortford.html>

⁶ <https://www.rightmove.co.uk/house-prices/harlow.html>

⁷ <https://www.rightmove.co.uk/house-prices/braintree.html>

⁸ <https://www.ons.gov.uk/visualisations/housingpriceslocal/E07000077/>

⁹ https://www.ons.gov.uk/visualisations/housingpriceslocal/E07000077/#rent_price

9.5 Earnings

Average Wage of Warehouse Worker: Varies significantly but anything between £19k to £33k per annum. ONS 2025¹⁰ quotes £27832 gross, delivery drivers £27854 and fork-lift drivers £31279.

9.6 Employment in Uttlesford by Sector

9.7 Section 5.3.14 notes: “*the largest sector in Uttlesford as of 2023 is the accommodation and food services sector which accounts for 24.5% of total employment, supporting 12,000 jobs. This sector also accounts for the largest share of employment in Takeley (46.3%)*”.

9.8 **Table 5.17** shows that “*the largest sector in Uttlesford in 2024 is the business, financial and professional services sector, accounting for 32.9% of businesses*”.

Specific reference to the warehousing and distribution sector is missing from the data presented.

9.9 Population and skill set

9.10 ONS¹¹ Data 2024 cites the unemployment rate in Uttlesford as 3.2% - lower than the East of England as a whole. In 2023 this equated to circa 1,500 people aged 16 and over. Given the numbers that the Developers claim will work at this site (over 900 per annum during the construction phase with floor space calculated to support over 2000 during operational phase) it is evident that the majority of employees at this site will commute into Uttlesford by car.

9.11 The three most common industries employing people aged 16 to 74 in rural Uttlesford are: “*Real estate, renting and business activities*”, “*Wholesale and retail trade; repairs*” and “*Manufacturing*”.

9.12 The population of Uttlesford is generally considered to be well educated, at Level 4 or above (Table 5.19).

9.13 Para 5.4.1 claims “*Economic benefits will arise through the provision of temporary jobs during the construction phase at the Application Site, which is estimated to be two-years*”, but since it is demonstrably highly likely that most of those jobs will be filled by individuals who commute into the area, **any economic benefit is unlikely to be felt in Uttlesford**?

¹¹ <https://www.ons.gov.uk/visualisations/labourmarketlocal/E07000077/>

9.14 The Negative Effects of the Scheme

The Developer has failed to properly explore the negative effects of this proposed development. These are relevant to baseline conditions and can be assumed to include the negative effects on:

- net zero/climate change through increased commuter traffic.
- net zero/climate change through over 4000 traffic movements per day (minimum).
- neighbourhood amenity including noise, vibration, health and well-being (construction and operational phase).
- pressure on the road and highway network through increased traffic and further damage to roads.
- poorer air quality and the effect on Hatfield Forest SSSI.
- Surface water drainage and flood risk in secondary local/emergency access.
- Foul water drainage pollution risk.

10. Cumulative Schemes

- 10.1 Table 5.22 is devoted to cumulative schemes. Fourteen planning applications are cited but only four have been scoped into a cumulative assessment. Other nearby schemes such as those in close proximity to the M11 J8 but in Hertfordshire have been excluded despite their close proximity.

11. Contribution to Economic Output

- 11.1 Para 5.6.5 claims that *“The contribution of the Proposed Development to economic output has been calculated by taking the job creation associated with the scheme and multiplying by an estimate of average level of GVA per employee in the East of England for the relevant industries”*.
- 11.2 There is no indication of the numbers used in “*job creation*” and what is separately proposed in both the operational and construction phases. Figures have varied from circa 900 FTE to 2000 plus. It is not at all clear how the developer can justify these claims, ie how they were calculated and **what precisely** are the “*relevant industries*”. This should be clearly explained and calculations demonstrated.
- 11.3 Para 5.6.6 further claims: *“It is estimated that once operational and fully occupied, the GVA generated by the Proposed Development **and cumulative sites** is estimated to be around £296.7million per annum”*.

The statement is therefore **NOT** relevant specifically to this site but appears to include the new developments at Stansted Northside.

- 11.4.1 The Developer further claims that *“The significance of the permanent effect on economy in the operational phase is considered to be **major beneficial** at the*

*District scale which is **significant** in EIA terms*". This claim is largely based on economic output from housing developments (see Section 5) proposed in the ELP. The ELP is not yet agreed, housing will be phased until 2041 subject to planning consent and very few occupants are likely to work at this site. Hence the claims by the Developer concerning the "*operational phase*" are completely unjustified.

12. Planning Policy

- 12.1 Planning Applications are currently considered under the Adopted Local Plan with the Draft Local Plan given some weight. Whilst policies in the Adopted Plan could be considered to be 'out of date' does not mean that a policy carries no weight and due weight should be given to them. Whilst the emerging Uttlesford Local Plan is a material consideration, it currently carries limited weight.

The NPPF (2024, paragraph 232) states "*....existing policies should not be considered out-of-date simply because they were adopted or made prior to the publication of this Framework*".

- 12.2 The Developer's Socio Economic document devotes a total of four lines and one word to the current local plan and ignores policies ENV2, S7, S8 and GEN4 of the LP all of which **are still relevant**. These are explored in the note from Richard Buxton Solicitors on behalf of Takeley Street Action Group and published on the Planning Portal.

13. Summary

- 13.1 Around 1,500 people aged 16 and over in Uttlesford were unemployed in the year ending December 2023. This is a rate of 3.2%. According to the ONS¹², the Claimant Count in Uttlesford was 1160 in March 2024, hence it can be assumed that a significant number of the 900 plus construction workers required annually for a period of two years will not live in Uttlesford, let alone Takeley and will commute most likely by car.
- 13.2 A commute by bus other than from Takeley or Bishops Stortford would require at least one change. Timing of each segment of travel then becomes critical to ensure that travel time is not significantly extended.
- 13.3 Takeley village is 2.7k distant from the proposed site – considered too far to walk and no cycle routes are in place. Contrary to the Planning Statement there is no railway station on-site, Stansted Station being 5.6 km distant and Bishops Stortford railway 5.3 km with no footway or cycle access across M11 J8.

¹² <https://www.ons.gov.uk/visualisations/labourmarketlocal/E07000077/#claimant-count>

- 13.4 It is unlikely that a warehouse worker or delivery driver employed at Land North of Taylors Farm, could afford to buy a house in Takeley or would live in Takeley. They would have to commute into the area.
- 13.5 **Given the above, the economic contribution to UDC will likely be limited**?
14. Conclusions
- 14.1 The Environmental Statement Socio-Economics document is not robust and lacks rigour. It is unconvincing. Its overall purpose in terms of the Scoping Opinion is unclear. It appears to simply be an excuse to ignore critical topics named in the Scoping Opinion, ie. population and human health. We note from the Pegasus Linked-in Video that they claim that a Socio Economic Appraisal is designed to complement Planning Applications, yet in this instance it seeks to replace two key areas.
- 14.2 The core of the Socio Economic Statement is based on ‘professional judgement’ with no demonstrable scientific or factual basis.
- 14.3 Overall, there appears to be no evidence-based consideration of what modern economic needs are relevant for Uttlesford. Given the education profile of the population, consideration should have been given to the needs of the modern economy and knowledge-based industry.
- 14.4 It seems likely there will be little if any economic benefit to Uttlesford, although likely to be of significant economic benefit to the Developer.
- 14.5 The Developer should submit separate chapters focusing directly on population and human health as requested by Uttlesford. These topics are not adequately addressed.
- 14.6 Relevant experience of the Authors who reviewed the Developer Socio Economic submission includes project review and evaluation for the European Commission Horizon 2020 programme. Whilst EC project work would be expected to be more robust than a local planning application, this submission still represents a multi-million pound investment.
- 14.7 The submission, decision makers and residents should be treated with respect. Evidence provided by Developers and their paid consultants should be robust and accurate. It should not in any way depend on “*professional judgement*”. The legal impact of any subsequent flawed decision making would of course fall on Uttlesford, its Councillors and Officers – not the Developer.