

RESPONSE TO SUDS

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 +650 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.

Document Status: Formal Written Objection

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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.

Re UTT/25/2786/OP - Land North Of Taylors Farm, The Street, Takeley

1 Culverting, Drainage and Surface Water

1.1 We welcome the holding objection from SUDS dated 10 August 2026 as Flood Risk and drainage raise serious concerns for TSAG members. Appendix 1 attached to this document provides significant photographic evidence of existing culverts on this site.

1.2 We note that SUDS have asked:

“Please clarify if the proposals include filling in and building over an existing ditch”.

1.3 The site boundary to the South adjacent to the B1256 has a very deep roadside ditch along most of the length, partially culverted. Construction of both access points and the proposed filter lane (third lane on B1256) would involve filling in, culverting or building over that ditch. This ditch drains to Shermore Brook and ultimately Hatfield Forest SSSI. Shermore is the only feed for the lake at Hatfield Forest.

The Developer has failed to include any details in the submission demonstrating how they intend to incorporate the extremely deep highway ditch at the site Southern Boundary of the site into the proposal or how it will be maintained long term once bridged or culverted to enable the construction of the filter lane to access the site.

1.4 The updated Flood Risk Assessment part 3 page 24 raises serious concerns:

“It was advised that there is a ditch that runs from the north of the site to the south which appears to receive no flows and has a sound bund at its northern most point and therefore appears redundant. It is planned that this ditch will be built over”

1.5 There is no evidence that this ditch is redundant and no evidence that it receives no flows. Terminology such as “**advised**” and “**appears**” are not scientific and not based on any data. Building over the ditch, a feed to Shermore Brook, is simply a convenience for the Developer and potentially an ecological disaster for Hatfield Forest SSSI.

1.6 We note that Richard Jackson (para 7.1.6) on behalf of the Developer has stated that culverting will take place to enable construction of an internal road and that the land will be plateaued, inevitably altering the flow of water. There is no detail of what area will be plateaued, by how much and how it will affect the **several** culverts on the land.

1.7 We note that the Developer has failed to indicate the additional culverts already on site. We draw your attention to Appendix 1. TSAG members walked LNTF in September 2024, preparing a document for Regulation 19. It provides an accurate record and photographic evidence of existing culverting on site and notes that flows from 2 culverts run into Shermore, then under the B1256 to Hatfield Forest. There is no redundant culvert as the Developer would have you believe. Whilst TSAG members have walked

the 27ha site, we cannot guarantee that we have included everything. We have evidenced significantly more than the Developer has chosen to share.

1.8 The NPPF August 2026 is very clear:

Page 87, F8 Sustainable drainage systems and watercourses 3 states:

“Development proposals should not enclose existing watercourses where this is not already the case, unless there are compelling reasons to do so; and should where possible remove existing culverts and renaturalise existing river channels, unless to do so would increase flood risk”

There are a number of culverts on this site that have not been disclosed by the Developer who should indicate where they are and whether they intend to open them up.

What the Developer intends is solely for their own benefit and in complete contradiction of the NPPF and should be refused.

There are **NO** “*compelling reasons*”.

- The site is a “*technical oversupply*”.
- The Developer could have opted for an A120 access but chose not to.
- It is a 27ha site with 18ha to be developed.

2 Wastewater

2.1 The Environmental Impact Assessment para 11.5.9 states:

“Any wastewater will need to either be directed to the foul sewerage system or treated and then discharged to the watercourse network once it has reached the required standard”.

We understand that it is not legal to discharge a mix of treated and foul water to the same exit pipe.

2.2 The Developer issues a caveat in the EIA:

*11.5.38. Provided that the appropriate improvement works are implemented by Thames Water, the impact of the Proposed Development upon the overall foul system will be **negligible (not significant)**.*

Thames Water is on the brink of financial collapse. There is no guarantee either **IF** or **WHEN** any improvement works will be carried out.

The Developer intends wastewater (both treated sewage and surface water) to go to Takeley Wastewater Treatment Works which does not have capacity and has discharged 424 hours of sewage directly to Pincey Brook between (Oct 2025-Mar 2026) (Picture 1).

2.3 The Environmental Impact Assessment Para 11.5.26 states:

“A detailed drainage strategy will be developed, which will be secured by condition, as the proposals progress”.

This is inadequate for a development of this size and nature ie B8 in proximity to a SSSI and adjacent to Priory Wood (Ancient Woodland) and residential homes. It is also a condition that cannot potentially, be met. The term *“will be developed”* is not good enough when it has not yet been proven that this is even possible.

3 Maintenance Arrangements

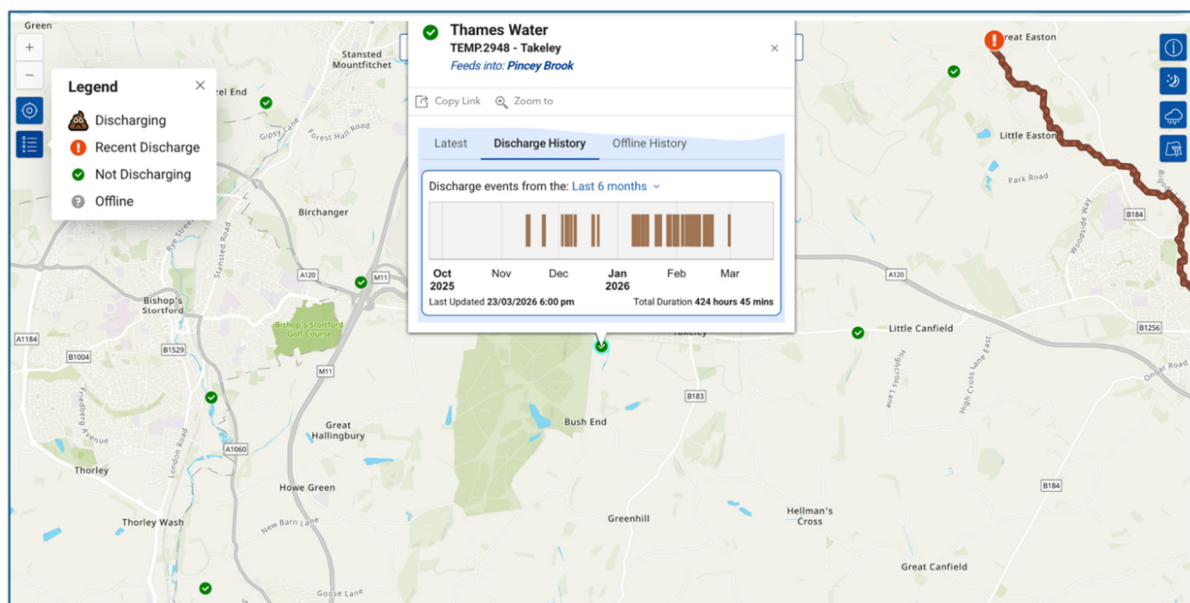
3.1 We have established that a Consultant, acting on behalf of the Developer has used a camera to obtain CCTV footage under third party land of a culvert essential to their drainage strategy. This culvert is underneath the garden of a residential property and the manhole cover indicated in the report is adjacent to their garden patio doors.

3.2 The NPPF August 2026, F8: Sustainable drainage systems and watercourses specifies that Sustainable Drainage Systems should:

“Have maintenance arrangements in place to ensure an acceptable standard of operation for the anticipated lifetime of the development”.

Whilst the Developer has stated that maintenance arrangements will be in place and their CCTV has identified potential existing maintenance needs, they have no right of access to an essential part of the drainage system. Shermore Brook is culverted under third party owned land immediately exiting the site ie the highway, a private residence and the Flitchway. They CANNOT meet the requirements of the NPPF and have not proven otherwise.

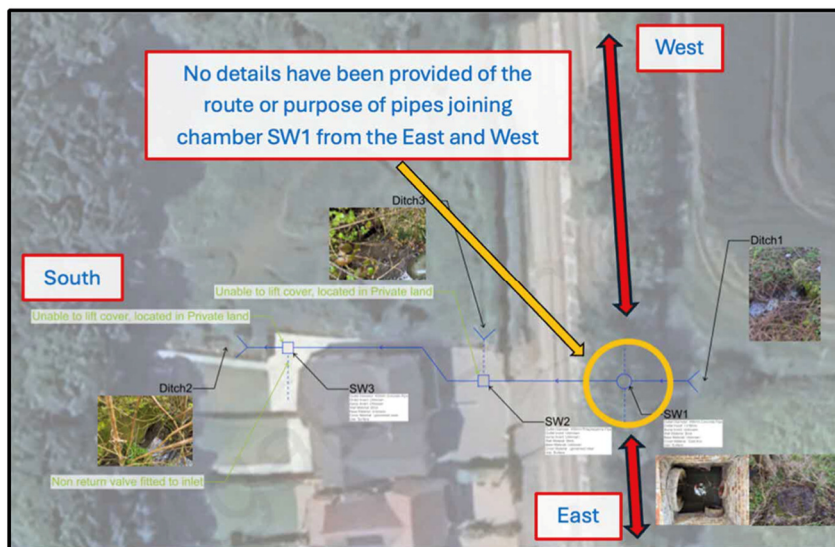
Picture 1: Takeley Wastewater Sewage Discharge to Pincey Brook



Picture 2

Extract from TSAG Dec 2025 comments detailing the SSFRA CCTV report which ignores specific details regarding the culverts East and West of the inspection Chamber indicated in the picture below. No further evidence has been supplied by the Developer.

Further investigation of the roadside ditch and Highway Drains connections are required.

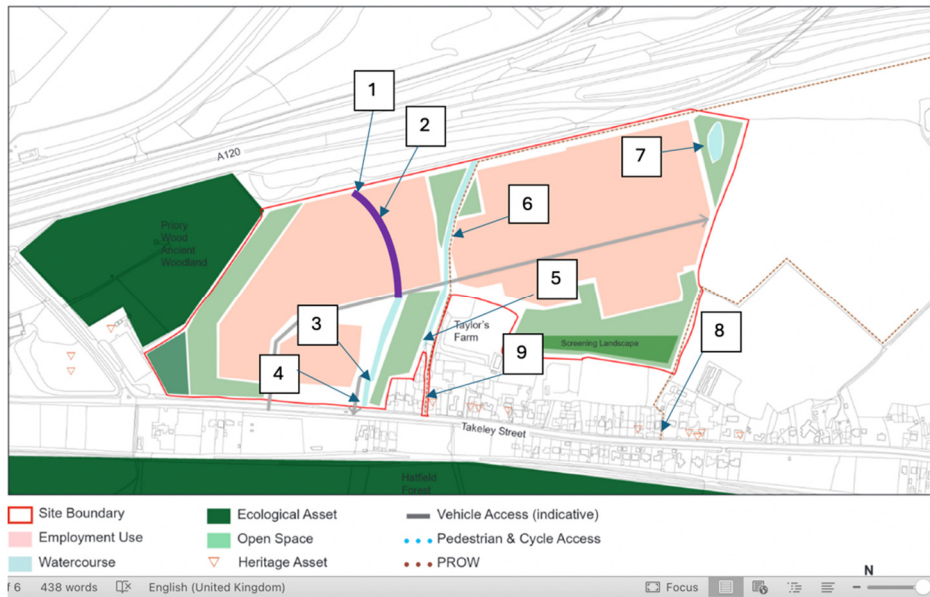


Appendix 1

TSAG Review of Land North of Taylors Farm 07/09/2024 & 08/09/2024 submitted for Reg 18

Saturday 7th & Sunday 8th of September 2024. Land North of Taylors Farm (UDC LP Reg 19 Framework Plan 3C).

1. Inaccurate length of western watercourse. Actual length highlighted in purple.
2. Location of culvert outfall on western watercourse, arriving from north east angle. Length unknown, source unknown. Culvert diameter approximately 6 inches. Depth of brook approx. 6 foot. Evidence of old tress growing within brook to prove this is not a recently dug ditch.
3. Western watercourse culvert, approx. 5m in length presumably to allow tractors to cross. Modern, brick wall and concrete culvert.
4. Culvert from Western watercourse passing under B1256. Culvert diameter approximately 18 inches. Modern construction, brick wall surround.
5. Culvert from Eastern watercourse passing under B1256. Culvert diameter approximately 18 inches. Modern construction, brick wall surround. 2 additional culverts of modern plastic construction, unknown sources.
6. Eastern watercourse culvert, approx. 5m in length presumably to allow tractors to cross. Older style, made with timber.
7. Watercourse does not exist in the north-eastern boundary (although as this drawing is a future plan it may be part of their plans to have a pond here as the land does bank down in this section).
8. Depth of both watercourses approximately 6ft throughout.



Picture 3 Original diagram from South Uttlesford Site Development Templates

Picture 4 **Culvert from Western watercourse passing under B1256?**
(Location 4 on diagram)?



Picture 5 **Close up image of Culvert from Western Watercourse passing under B1256 (Location 4 on diagram)**²



Picture 6 **Location of Culvert from Western Watercourse passing under B1256?**
(Location 4 on diagram)?



Picture 7 **Culvert outfall on western watercourse, arriving from north east angle?**
(Location 6 on diagram)?



Picture 8 **Culvert from Eastern Watercourse passing under B1256**
(Location 5 on diagram)



Picture 9 **3 x Culverts at Eastern Watercourse**
(Location 5 on diagram)



Picture 10 **Culvert outfall on Western watercourse (location 2 on diagram), arriving from north east angle** Length unknown, source unknown? **Culvert diameter approximately 6 inches** Depth of brook approx 6 foot? **Evidence of old tress growing adjacent to brook demonstrate this is not a recently dug ditch?**



Picture 11 Shermore Brook flow from the site as it exits from under third party land known as ‘Deacons’



Picture 12 Shermore Brook flow at the point it enters Hatfield Forest from below the Fritchway



Picture 13 Shermore Brook approx 50m within the Northern edge of Hatfield Forest. Water flowing from the culvert under the Fritchway and the B1256. As evidenced the Brook takes **significant** flows from the site during wet weather. These are essential to feed Hatfield Forest (SSSI) Lake.

