

Re: Section 62A Planning Application: S62A/2023/0017 Land at Tilekiln Green, Stansted, Great Hallingbury

These proposals are for a logistics operation in what is predominately a residential area. The site will operate 24 hours, 7 days a week. This is clearly not in keeping with the rural and residential nature of the area. The applicants have chosen to ignore the impact this development will have on the homes directly opposite the proposed entrance, The Old Elm, The Old Stables and Willow House.

In 2016 UDC were in discussions on the use of the this land, their comments are as relevant today as they were when written “No relevant pre planning history, although an exploratory preapplication proposal meeting was held in 2016 between Council officers and an interested third party to consider the future use of the site for commercial/employment use in response to enquiries from potential firms about utilising the site for this purpose. The Council responded by saying that the principle of change of use of the site from greenfield to commercial use would be contrary to local and national policies due to its countryside location within the CPZ and therefore any proposal would need to demonstrate how the need for the proposed use would outweigh the harm it would have on the countryside (UTT/16/0956/PA).”

Within their application the applicants consultants describe the site as “The existing site comprises an area of fields and woodland accessed from the North east via Tilekiln green. There are no buildings residing on the site, however, it sits adjacent (to) a cluster of residential properties to the southeast corner”. This statement highlights the rural nature of the site and also contains significant errors. There are houses and residential properties on the eastern side of Tilekiln Lane, directly opposite the proposed site entrance/exit. To the North and South of the B1256 residential properties are being built these will suffer from the continual disturbance created by the facility as proposed.

This site is within the Countryside Protection Zone established by Uttlesford District Council to protect and preserve existing communities. To prevent coalescence of communities and to maintain the rural nature of Stansted Airport as defined in the original plans and concept. The emerging local plan does include proposals to support and maintain the existing CPZ. The NPPF confirms that such protection should be allowed and that protection can be carry forward to future plans and is relevant in the interim. The NPPF calls for development to be “sustainable, align growth and infrastructure, improve the environment, mitigate climate change, (including by making effective use of land in urban areas)”. These proposals fail all these tests. Currently this site assists with carbon sequestration, forming a natural barrier with the M11 effectively isolating the existing homes from the worst of the affects of the M11. Destruction of existing habitat on this land will add to greenhouse emissions. This development is a greenfield site, creeping development such as this must not be allowed.

Being a rural area it is unlikely that the local electricity supply will support the significant number of vehicle charging points, lorries and private cars that these proposals include.

This development will have a severe and negative impact on the local protected and listed building, The Elm, located directly opposite this site. NPPF requires protection of the asset and as importantly the setting in which it sits. These proposals fail this test. Vibration from extensive use of heavy vehicles has the potential to damage this listed building, built during times before lorries. Extensive investigation must be completed to identify any archaeological items on the site, desk based research as used to support this application is NOT suitable for a site in an area that has proven ancient history. Research in the local vicinity has identified many medieval sites of archaeological importance together with the proximity to the Roman Road and further local archaeology must be documented.

Bounded to the south by the Flich Way, a rural path of great importance to local residents, and environmental corridor. A development of this type, size and nature has the potential to inflict serious damage to this environment. The SSI, Hatfield Forest is adjacent and the National Trust have expressed their concerns about the potential impact this develop will have, very little can be done to reverse any damage. Large areas of the site will be hard landscaped. In times of heavy

rain, events frequently occurring, there will be significant runoff and by the very nature of the activity on this site the runoff will include up to 300 toxic pollutants, including hydrocarbons, heavy metals contaminating local watercourses and land causing irreversible damage. The steep sloping nature of the site only exacerbates the likelihood of runoff into existing water courses. Damage to water courses, invertebrates, fish and other wildlife caused by vehicle pollution is well documented. Resulting in irreversible damage to the environment. This site is very local to Hatfield Forest a site of SSI which we have a duty to protect and nurture, not to surround in concrete and tarmac. Wildlife does not recognise our boundaries.

As a 24 hour operation this site will cause great disturbance to local residents and wildlife, site flood lights creating considerable light pollution. Vehicle lights adding to the disturbance. Noise will be ongoing, not only limited to engine noise. Beeping of vehicles reversing whilst vehicles are manoeuvring. Slamming of lorry cab doors. Wren kitchens use drawbar lorries with demountable bodies, there will be noise associated with this type of vehicle as they are switched between lorries. Further disturbance will be created during staff shift changes, private cars and the like. No doubt they will be using fork trucks or similar site vehicles with strobe type flashing lights fitted to their cabs, causing further pollution to the area. No mention on how these vehicles will be fuelled. Light pollution causes great disturbance to local nocturnal wildlife, which is an important food source for many endangered species. With a mix of disabled bays, electric charging points and standard bays over 100 parking bays are proposed. This is clearly a significant increase in traffic and an indication of proposed traffic levels. This is further supported by increased manufacturing capability at Wren Kitchens main site highlighted in previous documentation provided. Activity on this scale can not be sustainable on this site.

Tilekiln Lane is a restricted road, limited to 7.5 tonnes. As highlighted by Essex Council in the previous application(s) nothing in these proposals will prevent lorries using this route through to the new junction 7a on the M11, thereby avoiding delays to junction 8. Junction 8 of the M11 is already at capacity, whilst improvements are being undertaken these will only improve access from the west of the junction accommodating the significant additional traffic from the residential development being completed to the north of Bishops Stortford.

Currently Wren lorries travelling from the north towards their existing site only need to negotiate one exit of the junction 8 onto the A120. When leaving their existing site and travelling south they are able to join the M11 without entering junction 8. These proposals will see ALL lorries having to use Junction 8. Their length will cause further blockages and delays within the junction. These proposals are to move the B1256 and Tilekiln Lane junction west towards the M11 junction. The affect of this will be to increase congestion within junction 8. Wren lorries, which can be up to 18.75 mtrs long, when turning right off the B1256 into Tilekiln Lane will have to queue causing traffic to backup into junction 8 with the affect of delaying traffic trying to negotiate junction 8. 2 lorries queuing will backup into junction 8. Lorries departing the new site will frequently have to rely on other motorists to give way to allow access onto the B1256. Busy times it is likely that Wren lorries will backup into this new site causing further problems for other road users. Residents are all to aware of the queues and delays that occur at this junction, irrespective of the time of day. According to survey undertaken in 2019 by Takeley Parish Council B1256 is currently running at 136% capacity. There are no plans to improve this road. Yet these proposals will see lorries and their trailers trying to negotiate this junction. The B1256 is not suitable for regular use by lorries and the trailers of this size and will have the potential for inappropriate and unsafe decisions by drivers. In the event that junction 8 or the B1256 become closed to traffic, through planned maintenance or accidents, there is NO alternative access to this site. Highways England have recently announced a series of planned closures for this junction. During such closures where will these lorries go?

A discussion September 2021 in relation on the impact of development taking place in and around Takeley and the impact on junction 8 with the M11 [https - ://publicaccess.Uttlesford.gov.uk/online-applications/files/DFED1981E9EF54E7FC4198EAF143611D/pdf/UTT_21_2488_OP-HIGHWAYS NOTE-3737468.pdf](https://publicaccess Uttlesford.gov.uk/online-applications/files/DFED1981E9EF54E7FC4198EAF143611D/pdf/UTT_21_2488_OP-HIGHWAYS_NOTE-3737468.pdf) UTT/21/2488/OP

In attendance were:- Mark Norman National Highways Shamsul Hoque National Highways Katherine W Essex County Council Mary Young Essex County Council William Allwood Uttlesford DC

“MN is concerned that a lot of separate applications are coming forward which, individually aren't likely to have much impact, but in combination are significant. There is no Local Plan to help inform the development likely to come forward and the infrastructure required to support it.

...

NH and ECC would like discussions with the developers to ensure that the cumulative impact on the junction is assessed and suitable proportionate mitigation is provided. An interim scheme is being provided in the short term and it is recognised that there is a need for a long-term scheme. This will be looked at through the work of the local plan and the National RIS Programme but a shorter-term strategy is needed, as there is no guarantee when or if a major scheme will come forward”. The problems with junction 8 were highlighted the weekend of 29th April through to 1st May, M11 northbound closed. Bishops Stortford gridlocked. Surrounding villages from Harlow to Takeley traffic solid. As local residents we felt like prisoners in our home. We advised family not to visit. <https://www.bishopsstortfordindependent.co.uk/news/more-m11-misery-for-drivers-after-bank-holiday-chaos-9310720/>

Since this discussion there has been much residential development along the B1256, within Takeley Street and further development around the Four Ashes junction, including homes and care homes. Residents have suffered significant disruption to their lives with the road works on the eastern side of the M11 junction. It is unacceptable to prolong this disruption with the extensive works that are proposed to the B1256.

Development must be supported by suitable infrastructure improvements being beneficial to existing residents. Nothing in these proposals will be of benefit, but will likely cause significant harm to the immediate environment and for the many residents from Great Canfield, Takeley Street, Takeley, Little Canfield and many smaller communities who have no alternative but to use junction 8 for their daily routines. Accessing educational facilities, healthcare, leisure and recreational facilities in Bishops Stortford the increased traffic volumes, not only the lorries but staff vehicles used during the daily commute to the site will cause unacceptable congestion and delays.

The applicant has submitted statements from Coke Gearing, who I believe handled the original land sale, highlighting the alternative lack of sites available, however, this report is short sighted and limited to sites within Uttlesford. It is significant that NO consideration has been given to wider areas such as Harlow, M11 junctions 7a or 7, or Stevenage, accessible from the A1, both areas having extensive appropriate industrial areas separate from residential areas.

These plans are ill conceived and clearly produced in desperation. This type of industrial operation must be kept to existing industrial areas, or brownfield sites as found within the confines of Stansted Airport, as detailed within the NPPF. These proposals fail these requirements.

The application highlights that the LPA inspector recommended approval for this development, When reading the summary of the inspectors report it is difficult to understand how they reached this decision given the high number of local and national policies that would be breached by such approval. Further, it is normal for local sites to be approved subject to time limitations, 08:00 to 18:00, yet contrary to this sensible policy they recommend 24 hour operations.

The LPA have recently approved a large commercial development to the west of the airport, supporting employment and commercial opportunities within the region.

Michael Gove, as the Housing Minister, made the following comments in an interview with Laura Kuenssberg on the BBC, 30th October 2022. “new developments should be "more beautiful", have the consent of the local community, be accompanied by the right infrastructure and protect the environment” These proposals fail these tests.

We are guardians of the countryside and owe a duty to our children and grandchildren to enhance and protect the environment, development of this type will destroy the environment. My wife and I urge you to support the previous decisions, made by the elected representatives of the local community and reject this application.

Mr and Mrs Critchley

