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24 May 2023

REF: Section 62A/2023/0017
Land at Tilekiln Green, Start Hill, Great Hallingbury

Dear Sir/Madam

Objection

Introduction

I wish to object to the above Planning Application. This site is unsuitable for a development of this nature and would do untold harm to the countryside. The area is lacking in suitable infrastructure. It is hard to see what benefit there would be to residents, to Uttlesford or to the economy. Indeed, the impact locally would be entirely negative.

The Application appears to say that because the Local Plan is out of date, it opens the door to reject all existing local policies and seems to adopt the premise that developers can build what they like, where they like. When they purchased this land with a view to a distribution centre, the owners were well aware that it was within a CPZ and a protected area. They were aware of local policies and the emerging Local Plan. The CPZ Policy was independently reviewed in 2016 and it was recommended that it be strengthened – not ignored.

Whilst the application makes much of the site being ideal for such a venture, it isn't. It is speculative development on a destructive scale. The location is not ideal. How 80 HGV's and up to 120 cars can access a small country road only a few metres from a motorway roundabout that is already at a standstill much of the time is inconceivable.

The potential noise and disturbance from lorries and lights for residents is untenable let alone the inevitable stench of diesel.

There is plenty of Industrial space available on the other side of the M11 roundabout and further industrial space to be available on the other side of the airport with better access to infrastructure.

Despite the arguments in the proposal, the adverse impact far outweighs any benefit other than to the profits of Wrens Kitchens.

1 Location

1.1 The proposed depot will be situated on an area of open fields and vegetation bordering the M11, B1256 and Tile Kiln within a Countryside Protection Zone. This WAS a wildlife haven until blitzed by the owners who felled trees, razed the landscape to the ground and filled in a pond whilst knowing that it is classified as “Protected Woodland”. Typical of Developers, this was done prior to application distorting any ecological surveys so that they could describe it as a “vacant wasteland” in their application. Hardly surprising since they destroyed that protected landscape.

1.2 The site would be located and adjacent to residential premises. Operating 24/7, movements would be unacceptably disruptive to residents. Roads are narrow. Large HGV’s are noisy. They run on diesel. There will be fumes.

1.3 The land was previously judged to be unsuitable by UDC when put forward for the emerging local plan. Whilst the plan was withdrawn, the main difficulties raised by the Inspectorate were to do with housing supply – not industrial land. The withdrawal of that plan does not make this land suitable for a lorry depot nor does quoting a very vague Planning Framework out of context.

1.4 UDC previously refused an application on a nearby piece of land on the following grounds: “The site lies within the Countryside Protection Zone as shown on the Proposals Map for the Uttlesford Local Plan (adopted 2005). ULP Policy S8 of the adopted plan makes it clear that new development will not be permitted in the designated Countryside Protection Zone if (a) new buildings or uses would promote coalescence between the airport and existing development in the surrounding countryside or (b) it would adversely affect the open characteristics of the zone. The proposed development by reason of the loss of this greenfield site would significantly and demonstrably harm the open characteristics of the zone at this location and the proposal would therefore be contrary to ULP Policy S8”.

1.5 The Applicant has claimed that the site at the airport has new owners who have declined to renew the lease. MAG bought Stansted airport in 2013. There are no new owners. There is plenty of available industrial land both at the M11 roundabout and with planning consent at the other side of the airport where it is better suited for access to major roads.

2 Roads and Traffic

Much has been made of the road access by the applicant.

2.1 This planning application would increase traffic at the B1256/M11 Junction 8 significantly. The updated M11 Junction 8 Business case, South East Local Enterprise Partnership February 2021 Page 4 para 1.9 states that “Junction 8 of the M11 was already operating at capacity and experiencing significant queuing.....”. The applicant claims, wrongly “that no capacity issues are expected well into the future”. This is simply untrue.

2.2 Upwards of 500 vehicle movements per day would be an added burden to the B1256/Junction 8 segment. Movement from the existing site would shift traffic from the A120/M11 slip road. Movements are cited as 500 over a 24 hour period. That equates to approximately 1 lorry movement every 3 minutes. In fact, the applicant claims (section 5.28) that “the proposal would be unlikely to attract significant traffic levels during the weekday AM and PM peak hours”. Does this mean a lorry movement more often than every 3 minutes at other times? Factor in Bank Holidays and it could be perceived as continuous.

This is not sustainable as far as local infrastructure is concerned and likely to lead to gridlock of M11 roundabout and the B1256 junction.– already a frequent occurrence. It is not uncommon for traffic in peak periods, or when there are roadworks, to be tailed back to the Audi Garage half a mile down the road.

2.3 Those 500+ movements would be HGV lorries for the most part, ranging from 7.5 ton vehicles to the 3 trailer road “trains” that Wrens boast of. These are additional HGV movements on the B1256 that would previously have been directed down an A road and away from local village traffic.

2.4 The Applicant claims that the business will expand 20-30% over the next 2 years. An increase in traffic must therefore be anticipated. After all, this proposal utilises around 60% of the site; plenty of space to accommodate business expansion putting more pressure on roads.

2.5 No traffic flows are given for vehicles turning East down the B1256. The earliest exit points are at Takeley Four Ashes – already at capacity – or the A120 junction at Great Dunmow. In both cases, HGV lorries would transit through a residential village location already overburdened with lorry traffic. When the A120 is at a standstill or closed, the entire network of village roads are already blocked.

2.6 The B1256/Tile Kiln Green section has a 7.5 tonne weight limit “except for loading”. The intention of this weight limit was not to service a distribution depot through a loophole that would allow HGV’s to drive through narrow country lanes on a daily basis. Technically, they could not unload.

2.7 The section of the B1256 between the M11 and Tile Kiln Green is an urban clearway. This is recent and implemented to address the traffic flow problems that already exist.

2.8 The applicant states “the proposed access junction should be regarded as sufficient to accommodate the largest vehicles likely to use it”, i.e. a max legal Heavy Goods Vehicle (HGV) and a large rigid HGV. Whether or not the proposed new access junction is sufficient, the distance from Junction 8 to the proposed new right turn to Tile Kiln is short. Vehicles such as those leaving Junction 8 Eastbound and turning right to the depot would potentially cause traffic to back up to the roundabout, particularly the larger “road trains”.

2.9 Whenever there are works or an accident on the M11 between junctions 7 and 8, or the M11 Junction 8 roundabout, traffic is diverted through Sheering, the Hallingbury’s and Broad Oak. The traffic back up through the villages and along the

B1256 is significant. With a distribution depot at Start Hill and 500 HGV movements, complete chaos and potential gridlock is likely. This was frequently the case prior to the new A120.

2.10 The application refers to the Esso garage opposite the current turning but fails to mention that it has 2 access points, housing access to the West as well as Tocher House, with a large car park and numerous parking spaces. There is also residential access to the East, ie many more access points and subsequent vehicular movement than implied by the application.

2.11 The current potential parking for the proposed site is a maximum of 80 HGV's. There is no indication of the size of these vehicles, but they would be loading/unloading and leaving so there would likely be significant flow of HGV vehicles throughout the day and cars.

2.12 At some point vehicles need to refuel. Are we to assume they cross the road to the Esso garage or cross the roundabout to the motorway services? Whatever they do, traffic disruption is likely given the volume of traffic and size of vehicles.

2.13 Moving Tile Kiln road is likely to prove expensive. Presumably some costing has been undertaken.

2.12.1 Who would be responsible for paying the cost of this?

2.12.2 Who would be responsible for the ongoing maintenance when presumably this road is handed to Highways?

2.12.3 Who would be responsible for paying for any services to be moved if necessary?

2.12.4 What would be the timescale and possible re-routing of traffic whilst development of the site was taking place?

2.12.5 How would this fit with the existing planned upgrades to the roundabout? (These do not affect the B1256 but could send traffic via Tile Kiln.)

2.14 The roundabout at Junction 8 of the M11 has been recently partially closed at weekends for roadworks. The result has been absolute chaos. Almost every country road saw traffic queuing. I sat in a queue from Hatfield Broad Oak to Takeley 4 Ashes – almost 3 miles on a Saturday out of peak hours. Start Hill would have been nearer to my home but the traffic queue was longer.

2.15 There is a low bridge only a few meters along from the proposed site. Lorries are stuck under on a regular basis despite the signage causing havoc to traffic. Lorries simply cannot turn right out of the site. There is nowhere to reverse if they make a mistake with the inevitable consequences.

3 Parking spaces and staffing

3.1 The number of parking, spaces suggest a large daily turnover of staff. Presumably they work shifts. There is no indication of the turnover in those parking spaces, but the Applicant must have a good idea. There will be movement day and night and some turnover in those 100 spaces plus noise and fumes.

3.2 The Applicant previously claimed that there are only a small number of permanent staff “although there would be a reasonable number of delivery drivers and their assistants operating from the site”. There is no indication of what “reasonable” means. The Applicant must have a “reasonable” idea of numbers because it knows vehicle movements, required parking spaces and personnel numbers. It claims to be bringing employment. Surely it must know numbers.

3.4 The Applicant claims delivery drivers and assistants are likely to arrive from 4am. It is not “reasonable” to expect local residents in adjoining properties to face this disruption.

4 Amenities

4.1 The Design and Access Statement indicates that this is to be an “open logistics facility with ancillary office and amenity space” but there is no office or amenity space identified in the application other than 2 portacabins.

4.2 It is “reasonable” to expect driver and assistants – male and female – to need to access amenities such as rest areas and toilets on site, particularly those driving from Wrens depots in the North. This would imply flushing toilets on mains sewage, lighting and heating, ie the portacabins would be fixed and should have proper plans submitted and permission sought for what are effectively permanent buildings. Would two portacabins be adequate for proposed staffing levels?

5. Lighting

The submission states that the design allows for “dusk till dawn dimming”. Regardless of what the report says, how then will a 24/7 facility with lorry movements every 3 minutes or less and accompanying ground staff – both men and women - operate safely and feel safe at night with dimmed lights? There is no doubt it will prove disruptive to residential properties some of which are directly on the boundary. Now that trees and hedges have been ripped out, there is little to shield them.

6 Water Supply and Drainage

There are water supply issues in this area. Some houses mains water supply was relocated from Start Hill to be fed by the Takeley supply. At one point, parts of nearby Thremhall were without mains water until this was remedied by switching the supply. In my case, Affinity Water doubled the size of the inlet pipe to my property and paid for and fitted a pump because there was inadequate pressure to heat my boiler. There was a house fire at a neighbouring property and the hydrant pressure was inadequate for the fire tenders. It is known that there are supply issues in this

area. Lorries will be washed and hosed down. Water is likely to be contaminated at this point. Presumably it will not simply be allowed to simply soak away.

7 Noise

7.1 There can be no doubt whatsoever that 500 lorry movements and around 100 cars will generate noise and disruption. It will happen 24/7. How can the Applicant seriously expect anyone to believe that there will be no significant impact on the quality of life of residents? (para 5.44)

7.2 Para 5.46 admits that noise levels would be above UDC targets for 2-3 hours every night. There can be no mitigation for loss of sleep and the impact on residents. This is entirely unacceptable.

8 Landscape and Visual Impact

The Applicant has ripped out the mature hedges and trees. They propose a buffer (5.49) having destroyed the existing one. The planting of the buffer proposed will take years to grow to the detriment of residents who will NOT enjoy the sight of 80 HGVs and associated noise.

9 Conclusion

In conclusion, this application – like those it supercedes - is characterised by what is missing rather than what it actually says, leaving more questions than answers. Given the likely cost to develop the site and move a road, together with the 20-30% planned expansion by Wrens, it would seem strange for this site to retain the status quo of the existing airport site and simply transplant it, unless of course further development is planned for the future.

Should the Inspectorate have a mind to grant this application, they should consider the following conditions:

No access to the B1256 other than a direct left hand turn to the M11 roundabout.

No access during rush hour periods. Children have been observed climbing out of cars at Junction 8 to get to school as the roundabout has been gridlocked.

No access to villages using the Start Hill route. In other words, ALL traffic should route only and directly to or from the M11 roundabout.

Restrictions to the use of diesel vehicles

Funding widened footway on both sides of Start Hill and the B1256.

Regards

Dr J Johnson

