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24th May 2023

Dear Planning Inspectorate

Please register these comments as my objection to Section 62A Planning Application: S62A/2023/0017 - Land at Tilekiln Green, Start Hill, Great Hallingbury

Thank you for taking time to consider my comments on the above application.

I believe the application is flawed and holds very little weight in relation to the size and scale of the proposal. The subsequent implications from any approval shall have an irreversible and detrimental impact on the B1256, M11 J8 and the surrounding village infrastructure, residential dwellings, and Countryside Protection Zone (CPZ). The planning statement is misleading and the application lacking significant information with parts of the submission being factually incorrect. I would expect statements having no evidence to back them up to be disregarded and trust that prior to determination further information will be requested that will give a crystal-clear picture of what is 'actually' proposed now, and of their intentions with regard to future expansion to allow you to make a fully informed decision.

1. The Site and Planning Background

1.1 With regard to land ownership (planning statement 2.5/2.6). The site was purchased by FKY in March 2018. FKY & Wren are two of 'many' companies all owned under the same umbrella (evidenced in the public domain at Companies House). The land was sourced by themselves prior to 2016 to rent to themselves, regardless of any lease at Stansted Airport which might or might not be terminable on a year's notice. The need to identify a new location due to their current lease is simply smoke and mirrors. FKY had previously cited carrying out Field Work Study in January 2016 and it appears sought preplanning advice. The site at Tilekiln Green has long been in their sights for some years, and almost certainly the reason they relocated to Stansted Airport in 2018 after they had purchased the site.

1.2 Previous planning application references listed in the planning statement are not in the correct format, which is confusing should the Planning Inspectorate wish to find the applications on the Uttlesford Planning Portal. The correct references are UTT/21/0332/FUL and UTT/22/0267/FUL

1.3 There are no significant material differences between the two previously refused applications and this S62A application. FKY clearly acknowledge this in their Planning Statement. Surely an applicant cannot keep submitting virtually duplicate applications with only very minor amendments until such time they get the approval they are seeking.

Regarding the first application UTT/21/0332/FUL the planning statement states (2.10) *'The proposals formed a similar scheme to that sought within this application....'*

That application was refused under delegated powers on the professional judgement of an experienced planning officer, it did not even make it to a committee hearing. FKY appealed. That appeal was later withdrawn – WHY? Did FKY suspected it would be dismissed?

Regarding the second application UTT/22/0267/FUL refused at Committee. The planning statement states (2.13) *A second planning application was subsequently lodged (ref 22/0267/FUL) to address the previous reasons for refusalThe proposals to which this statement relate are identical to application ref. 22/0267/FUL (as determined) and are therefore submitted under S62A of the T&CP Act 1990 for determination by the Secretary of State in light of Uttlesford District Council's designation.*

So why submit a S62A for an identical application when they could have simply appealed? One assumes if they lost an appeal that would have been their last chance. I suspect that if this S62A is refused they still have an opportunity to appeal that, or simply go back to Uttlesford and submit yet another similar application. How long might this continue.

1.4 The site was also the subject of an Enforcement case ENF/19/0260/B. It related to the destruction of the land, trees and filling in of a wildlife pond, carried out over a bank holiday weekend during August 2019. This conveniently took place prior to the submission of any of the above planning applications, and reduced the need of an in-depth ecology report after they decimated the land.

2. Parking Provision and Operational Movements.

2.1 The site can accommodate 80 HGV's, but how many urban and/or electric vehicles will be required to decant each HGV? Further clarification is required with accurate data to confirm the 'correct' quantity and type of vehicles intended to be using the site.

2.2 Other than HGV and staff parking, the parking provision has allocated very little parking for the Urban Vehicle/non HGV lorries etc that HGV's shall be decanting too. Nor does there appear to be adequate provision for the high-tech electric urban fleet intended to operate from the site to serve London. Where do they intend to park them all?

2.3 The HGV parking areas are terraced and therefore only accessible by ramps, thus only accessible at certain points. A logistics centre or for better words a haulage and distribution yard on a terraced site is far from ideal. I assume HGV's shall need to access ramps in low gear and most likely high revs at all hours of the day and night. In winter these will be icy and no doubt require vast volumes of gritting. The ramps will inevitably end up with diesel and hydraulic spillages causing them to become slippery. Surely this is a huge health and safety risk in a 24/7 operational area for HGV's, forklifts, fleet vehicles etc

3. Portacabins and Staff Amenity

3.1 The proposal shows two 'small' portacabins. What do they deem small? Should you grant approval conditions should be attached regarding the maximum size or quantity permitted on the site?

3.2 Wren operate from three cabins at Stansted Airport, with a work force of 130. They must demonstrate how two small cabins will be sufficient to provide adequate office, amenity, and training facilities etc for a depot of this size, and for the proposed increase of up to 200 staff. Further clarification is vital to establish exactly what they require, bearing in mind they will need restroom facilities for men and women, and these will need connecting to services.

3.3 They have specified a 4.5 hour journey from their factory to Stansted. To stay within the regulations HGV drivers must comply with 'Driver Hours'. The proposal does not appear to have adequate amenity/rest areas for the number of drivers. Do they intend directing HGVs etc to the Birchanger Service Station to use their facilities?

4. The Local Plan and Countryside Protection Zone

4.1 The Local Plan might be out of date, nevertheless it is still the 'current' LP and therefore must be given weight.

4.2 The application referred to in the planning statement (6.4) and allowed on appeal is irrelevant and should not set a precedent. The application was a small residential development in a residential area some miles from the proposed site. It is nowhere near the M11 J8. There is absolutely no comparison whatsoever, they are not like for like.

4.3 Policy S8 of the 2005 Local Plan has been considered as 'out of date' by the applicant. Whereas in truth, the Countryside Protection Study prepared in 2016 in preparation of a newly emerging LP states the CPZ should be strengthened. This 2016 document is current and Uttlesford have confirmed this in writing.

4.4 Stansted Airport is set out in the adopted Local Plan to be seen as an airport in the countryside. The Plan identifies a Countryside Protection Zone (CPZ). The priority within this zone is to maintain a local belt of countryside around the airport, that will not be eroded by coalescing developments. The proposed development due to its size, scale and type would result in the urbanisation of this sensitive rural location, defined as part of the surrounding CPZ. Wren Kitchens are currently based about a mile away from the proposed site and within the confines of an operational Airport, with no impact on the CPZ in anyway. Any benefits of relocation to the proposed site are not sufficient to outweigh the significant environmental harm to the countryside. As such the proposals are contrary to the current Uttlesford Local Plan Policy S8 (*in the Countryside Protection Zone planning permission will only be granted for development that is required to be there, or is appropriate to a rural area*).

5. Employment

5.1 Wren are expanding significantly and the threat of 130 job losses in the planning statement (5.14) in an attempt to gain planning approval just shows the depths they will go. Even if this were true and these jobs were lost they would still need to park their fleet. Or would they dispose of these also? Would they be halting factory production too? I think not! This is simply scaremongering. These type of threats are not a material planning consideration and they should not expect this to be considered as part of the decision process.

5.2 The proposal is misleading, it will not result in 200 local jobs. 130 are current employees and very few are local to the area. Jobs are not guaranteed to be filled by local people. This argument holds very little weight regarding local employment.

6. Highways and M11 Junction 8

6.1 Junction 8 is running at full capacity and currently undergoing significant improvements, highlighted in the South East Local Enterprise Partnership Business case. These improvements are significantly delayed. They are also only upgrading the west of J8. There are no improvements on the east of J8.

6.2 The junction is under significant pressure, not only being the intersection for the M11 but also for the A120, an International Airport, Birchanger Green Services, Ramada Hotel, an ambulance station, and the Days Inn Hotel. At its junction with the B1256 it serves all local traffic from the surrounding villages needing to access the local town and schools of Bishops Stortford. This is the only direct route for local traffic to cross the M11 motorway without the need to travel miles out the way, to get around either Stansted Airport to the North or Hatfield Forest to the south of the B1256. For this reason a large scale lorry distribution centre operating with triple road trains at this location is simply unsustainable.

6.3 Accident data for the M11 and A120 is relevant to this application. The M11 is frequently closed and the A120 also on numerous occasions. This results in Jct8 and surrounding villages completely gridlocked, further exacerbated at peak times. When Jct8 is backed up there is no access to the site for HGV's etc from various other routes due to Weight Restriction Orders, i.e. via Hallingbury from Tilekiln Green due to the low bridge; around the Airport via Elsenham due to restrictions on Grove Hill in Stansted; or through the airport via Coopers End due to restrictions on the link road between two roundabouts.

6.4 The Weight Restriction Order on Grove Hill already significantly impacts on Start Hill, B1256 and The Four Ashes crossroads in Takeley village. This is because anything over 7.5T accessing industrial estates and the numerous quarries in and around Elsenham, Mole Hill Green, Henham etc can only travel along the B1256 through Takeley via Jct8. The infrastructure is already under significant pressure, Jct8 and the B1256 simply cannot accept more lorries.

6.5 Until such time all highway improvements have been completed by Jct8, any development adjacent to the junction is unsustainable. The existing junction struggles to support the current volume of traffic which is at 'capacity'. It is not known if the upgrades currently taking place will improve matters until they are completed. Improvements will not reduce the volume of traffic but it is hoped it might keep it moving, only time will tell. With the proposed airport expansion and vast new housing developments the junction will rapidly become over capacity.

6.6 The proposed alterations to Tilekiln Green road at its junction with the B1256 will have significant implications for all users, and result in the junction becoming significantly closer to Jct8.

- The alterations will result in the junction being significantly closer to Jct8
- The modifications will result in a staggered crossroads, thus dangerous manoeuvres for those crossing to the Esso Petrol Station.
- There will be a significant impact on the Tilekiln Green junction with the B1256 should HGV/triple road trains and other lorries leaving the site need to cross two way traffic on the B1256 for refuelling.
- It is probable lorries waiting in the proposed centre lane on the B1256 waiting to turn into Tilekiln Green road will flash vehicles waiting to right turn (East) out the Tilekiln Green Road, to make pulling in easier. Traffic coming off Jct8 travelling East up their nearside will be obscured to those pulling out of Tilekiln Road, an accident waiting to happen.
- Lorries pulling away onto the B1256 will be on a significant gradient which could result in road safety issues depending on their length and speed pulling away from a stationary position. This will be

further exacerbated in severe weather conditions. i.e. Any compaction of snow on the hill from HGVs will significantly disrupt other road users.

- The triple 'Road Trains' used by wren (evidenced on their website) shall require adequate visibility to exit Tilekiln Green road that allows them sufficient time to exit the junction safely with three trailers. I not one of the photos of the junction in the planning statement has been taken from the centre of the road (B1256) and not from a lorry drivers angle waiting to pull out the junction.
- The transport Assessment highlights damage to the footpath and recommends bollards or post and rail fencing. This damage simply highlights how traffic backs up now, to the extent vehicles mount the pavement to pass stationary vehicles.



- Exiting Jct8 onto the B1256 is virtually a blind bend until the road straightens out. Vehicles 'Floor it' at this point to get through the traffic lights and exit the roundabout quickly. It would only take a couple triple road trains waiting to right turn into Tilekiln Green for traffic to back up to Jct8. Stationary HGVs and vehicles exiting the roundabout at speed are a serious accident waiting to happen.
- Photos submitted in the transport assessment highlight the junction and an empty road. These photos were from the previous applications, probably taken during or not long after lockdown when the junction was less busy. For comparison photos attached below highlight a typical morning school run. In fact during June 2022 my daughter changed my then 6 year old granddaughters school midterm, from Bishops Stortford to Takeley because a 10 minute journey was taking an hour. She could not continue getting a young child up an hour earlier to leave for school an hour earlier simply to sit in traffic.



7. Pollution

7.1 Pollution risk from this site is significant and needs to be carefully addressed. The application is ambiguous regarding daily operational activities intended for the site. The applicant needs to clarify exactly what the day to day operations will entail. A 'Depot' of this scale would normally provide for the pressure washing, servicing etc of their fleet (you rarely see a dirty Wren vehicle). The concreted area which serves the number of daily vehicle movements proposed will inevitably have considerable oil, hydraulic fluid and fuel spillages.

7.2 You cannot have a haulage depot without the need for certain fluids on site. Clarification is needed as to where on the site they will be stored.

7.3 The site is on a gradient and will inevitably result in surface water runoff and pollutants; there must be sufficient retention facilities to hold surface water and prevent pollution in the nearby watercourse. Any approval must be conditioned to ensure this.

8. Operational Hours

8.1 Wren currently operates out of the Airport and has direct access to the M11 and A120, without the need to pass a single residential property. The current location within the airport is an ideal location for a business operating 24/7 with absolutely no impact on any residential areas, at all. The proposed site at Tilekiln Green however is a residential area with numerous new residential developments currently under construction or recently approved, thus significantly increasing the number of residential dwellings. This location is completely inappropriate for 24/7 haulage operations. The application documents do not highlight all the new residential developments in close proximity to the site

8.2 Other local businesses such as SRC and Elsenham Quarry have conditions attached relating to operational hours and HGVs movements. This is because of HGV movements through residential areas. If the proposal is approved then conditions must be attached with regard to reducing operational hours at this location, i.e. not through the night or Sundays.

9. Business Growth

9.1 Wren Kitchen are now producing Bedrooms, this will inevitably double their operations. There are serious concern that should the application be approved Wren will then apply to the Traffic Commissioner to expand their fleet at this location.

9.2 The application states 130 employees with an estimated increase to 200. That was the same figure they gave for the previous refused applications, and prior to them producing bedroom furniture. So in reality this figure could double as might the number of vehicle movements.

10. Noise & Light Nuisance

10.1 The site is to be terraced with ramps to access each terrace. Acoustic fencing erected around the boundary will do NOTHING to reduce operational noise from lorry engines, reversing alarms, forklifts etc because the fencing will be significantly lower than some of the terraced levels. Noise will simply carry overtop of the fencing.

10.2 8m-10m Light columns are proposed. Lamps will be on the horizontal to prevent glare to air traffic but they are to be situated on terraced areas, therefore positioned significantly higher than some of the surrounding residential properties i.e Brookside. Although light spill might not reach properties, the glare from bright lamps will be elevated much higher than dwellings and will have a significant affect on residential amenity.

10.3 The application implies potential noise from the development will not be a nuisance because residential properties are already exposed to high noise levels from Stansted Airport and the M11. In reality, Airport noise is vastly reduced at night due to strict night flight restrictions and this is exactly when residents get a little respite. With a 24/7 haulage yard they will get NO respite whatsoever. If approved conditions should be applied to operational hours.

10.4 Noise from the M11 was significantly reduced until the destruction of the woodland in 2019. It will take some years, possibly decades for new planting on the site to mature enough to alleviate noise levels again.

10.5 With all operational activities taking place outdoors it is impossible to mitigate against 24/7 noise nuisance from the site.

10.6 The site and terraced areas are elevated above numerous residential properties. This will result in headlight intrusion from HGV and other vehicles manoeuvring in, out and around the site through the night. The proposed boundary fencing will be significantly lower than the terraced areas thus not prevent this light intrusion over top

10.7 Residents have the airport and the M11 to contend with. They need respite, not further noise and light pollution from yet another source. The day to day lives of residents in their own homes and their mental health and well being should carry substantial weight in the determination of this application.

11. Water Supply/Fire Hydrants

11.1 The water supply in the area is inadequate and there are still a significant number of developments yet to be connected. Affinity Water should be given the opportunity to comment on whether the pressure is adequate to serve the needs of 200 staff and the cleaning of vehicles etc

11.2 This weekend (21st May 2023) a neighbours house burned down along the B1256 in Takeley, one mile from this site (the details can be found online at Essex County Fire and rescue incidents page) The Fire Service had 9 appliances at one point but the water supply was so poor they could not save the property. They had even considered taking the appliances to a water tower near Smiths Green some 4-5 miles away and fill with water to assist fire fighters. It was that bad numerous homes in Takeley village and Start Hill were left with no water for hours simply because fire hydrants were in use. The fire service have clarified the limited water supply on their incidents page.

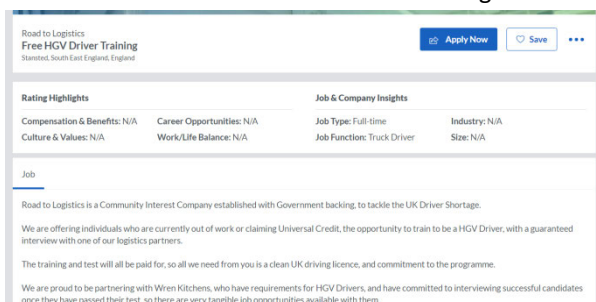
11.3 Is the water supply sufficient if a fire broke out on the application site, bearing in mind these vehicles are filled with wooden cabinets and a gas main runs under the site

12. Precedent

12.1 There are several developers and Land Agents currently attempting to gain planning permission in the CPZ. Almost the entire CPZ in Takeley either has 'An Option' on it with some developers going down the local plan route and others attempting to apply via the planning process. The granting of this application would be significant and the Planning Inspectorate would need to ensure this would 'NOT' open the doors and set a precedent. The CPZ is rapidly being eroded away.

13. HGV/Driver Training

13.1 Wren teamed with Road to Logistics were carrying out driver HGV training at the Stansted Site. If they continue to do so at Tilekiln Green then how many extra vehicle movements will this add. The applicant should disclose the number of HGV training movements expected to take place on a daily basis. It is assumed a further portacabin will also be required to support training, theory and examination purposes. The extra driver training HGV movements will have a detrimental effect on the surrounding road network and result in further disturbance to the residential area.



The screenshot shows a job listing for 'Free HGV Driver Training' by Road to Logistics. The listing includes a 'Rating Highlights' section with the following details:

Rating Highlights		Job & Company Insights	
Compensation & Benefits: N/A	Career Opportunities: N/A	Job Type: Full-time	Industry: N/A
Culture & Values: N/A	Work/Life Balance: N/A	Job Function: Truck Driver	Size: N/A

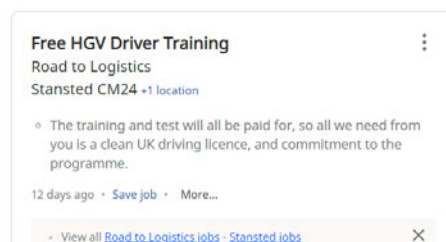
The 'Job' section contains the following text:

Road to Logistics is a Community Interest Company established with Government backing, to tackle the UK Driver Shortage.

We are offering individuals who are currently out of work or claiming Universal Credit, the opportunity to train to be a HGV Driver, with a guaranteed interview with one of our logistics partners.

The training and test will all be paid for, so all we need from you is a clean UK driving licence, and commitment to the programme.

We are proud to be partnering with Wren Kitchens, who have requirements for HGV Drivers, and have committed to interviewing successful candidates once they have passed their test, so there are very tangible job opportunities available with them.



The screenshot shows a job listing for 'Free HGV Driver Training' by Road to Logistics. The listing includes the following details:

Free HGV Driver Training
Road to Logistics
Stansted CM24 +1 location

• The training and test will all be paid for, so all we need from you is a clean UK driving licence, and commitment to the programme.

12 days ago • Save job • More...

• View all [Road to Logistics jobs - Stansted jobs](#)

14. Archaeology

14.1 This is an area of untouched land adjacent to the old Roman Road of Stane Street. If approved the site should undergo significant archaeological investigations prior to any kind of development that might be granted now or in the future. Especially as recently during a nearby archaeological dig a kiln was unearthed on a residential site yards from this site. There could easily be more.



15. Conclusion.

15.1 FKY/Wren had Field Work Study carried out in Jan 2016; sought pre planning advice in 2016; purchased the land in spring 2018; transferred their fleet in preparation from Hoddesdon to Stansted Aug 2018; decimated the land clearing it of trees, wildlife and a pond throughout a bank holiday weekend with no regard to their neighbours in 2019; applied for planning in 2021.

15.2 I sincerely hope the Planning Inspectorate can see through FKY and Wren Kitchens business plan, in which their intention since at least 2016 (possibly earlier) has been to relocate to Start Hill. FKY have spent a substantial sum on purchasing the land (Land Registry download) and simply intend to mislead everyone within their application. They appear to ignore everything in their path, including the local community, highway safety, M11 J8 capacity, ecology etc. The site was very clearly sourced for Wren Kitchens long before they ever took on a lease at the Stansted 'North Side', in which it appears was only ever intended a stop gap.

15.3 The type of development proposed with the likelihood of expansion in the future will result in significant environmental harm to the Countryside location, within the CPZ.

If the application is granted please ensure conditions are attached to that approval such as

- Lighting
- Operational hours in a residential location
- Prevent lorries from using the B1256 through the village of Takeley (as they have National Express Coaches & SRC aggregate lorries)
- No vehicles to travel in convey (akin to Elsenham quarry)
- Noise levels
- Maximum size and quantity of portacabins permitted

This list is not exhaustive

Regards
Allison Evans