

PO Box 311 Takeley Bishop's Stortford Herts CM22 6PY Tel: 01279 870558

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Planning Department
Uttlesford District Council
Council Offices
London Road
Saffron Walden
CB11 4ER

<u>Draft Local Plan (Regulation 18) - Consultation Response</u>

We have two main concerns about the draft Uttlesford Local Plan ('ULP'), as follows:

1. The proposal to allow housing and other development on the Countryside Protection Zone ('CPZ') south of the airport.

As far back as 1985, when the Government decided that Stansted should be London's Third Airport, there was a promise that Stansted would be the 'Airport in the Countryside'. Sprawling development, as seen around Gatwick and Heathrow, would not be permitted at Stansted.

In 1995, the vision of an Airport in the Countryside was reinforced by UDC with the designation of the CPZ around the airport perimeter. The purpose of the CPZ is to prevent urbanisation by restricting development which could cause coalescence between the airport and surrounding settlements. Ever since 1995, the CPZ policy has been consistently maintained by UDC in the area south of the airport between the A120 and the settlements of Takeley and Takeley Street, regardless of which political party was running the Council.

A 2016 study of the effectiveness of the CPZ¹, commissioned by UDC and carried out by Planning Consultants LUC, concluded as follows

There are variations in the contribution that different parcels in the study area make to CPZ purposes. However, this study has demonstrated that the majority of the CPZ is performing well against the purposes defined for it. The CPZ helps to maintain the openness of the countryside and protects its rural character and restrict the spread of development from the airport. For some parcels, particularly to the south of the airport, the CPZ plays an essential role in protecting the separate identity of individual settlements.

[emphasis added]

The draft ULP proposes, (paras 6.31 to 6.33 and Appendix 7), to declassify a large and particularly important part of the CPZ to the south of the airport. This would be to abandon the longstanding policy of maintaining Stansted as the Airport in the Countryside and to disregard the evidence of the expert planning consultants commissioned by UDC in 2016 to review the effectiveness of the CPZ. **We strongly object to any erosion of the CPZ.**

¹ 'The Uttlesford Countryside Protection Zone Study, LUC, July 2016, https://www.uttlesford.gov.uk/media/5896/Countryside-Protection-Zone-Study-LUC-2016/pdf/Uttlesford CPZ Study Approved Final.pdf?m=636015910846570000

2. Proposed UDC policy towards the expansion of Stansted Airport.

We fully accept that there is little value in UDC having a local planning policy on airport expansion which is contrary to Government policy. However, it is extremely concerning to see, in the draft ULP, that the proposed policy towards the expansion of Stansted Airport is far more liberal and supportive than even Government policy.

Core Policy 11 in the Draft ULP needs to be amended to align with Government policy by stating that the Local Plan will support making "best use" of the Stansted runway (defined as a throughput of 43 million passengers per annum, and for which planning permission has already been granted) but will <u>not</u> support a second Stansted runway.

Finally, we would draw your attention to two factual errors in the draft ULP, both of which overstate the importance of Stansted Airport:

(i) Para 6.31 describes Stansted as the "Country's second busiest airport" but the facts are as follows:

Airport	Number of Passengers handled ('000)	
	2022	2023 to date (30 Nov)
Heathrow	61,597	72,625*
Gatwick	32,831	46,270*
Manchester	23,340	27,817
Stansted	23,290	27,741

^{*}Based on actual traffic figures to October 2023 and estimate for November 2023.

Plainly, Stansted is the UK's fourth busiest airport (as, in fact, is stated in para 2.30), not the second busiest.

(ii) Para 2.30 states that "London Stansted Airport is the biggest single site employer in the East of England", echoing claims often made by London Stansted Airport management. However, filings at Companies House show that 'London Stansted Airport' had an average of 1,759 employees during FY 2023. It is estimated that there is currently a total of around 12,250 employees and 200 employers all across the airport campus. London Stansted Airport (i.e. MAG) itself accounts for about 14% of the total employees on the site

By comparison there are over 20,000 employees on the Addenbrookes campus and this is forecast to reach 30,000 by 2030. The majority of employees at Addenbrookes are in the public sector and so it would be acceptable to claim that "London Stansted Airport is the biggest single site *private sector* employer in the East of England", but there needs to be that qualification to avoid overstating Stansted's importance to regional employment.

Please advise if we can be of any further assistance.

Yours faithfully

Brian Ross Chairman