

Appendix 2 – Consultee Responses

Sport England

For the attention of Maria Shoesmith

Dear Ms. Shoesmith

App Ref: UTT/22/0434/OP – Land North Of Stansted Airport (Sport England Ref: PA/22/E/UT/60983)

I refer to the letter (and attachments) from the applicant's agent dated 17th November 2022 which provides details of the 'Football Pitch Mitigation Strategy' relating to the above planning application in order to address the loss of the football pitches used by Elsenham Youth FC. Sport England's initial formal response to the consultation on the application dated 11th March 2022 as a statutory consultee objected to the application as there were no detailed mitigation proposals at the time and the proposals were therefore not considered to accord with any of the exceptions in our Playing Fields Policy and Guidance https://www.sportengland.org/how-we-can-help/facilities-and-planning/planning-for-sport#playing_fields_policy. Since then, the applicant in consultation with various stakeholders including Sport England has developed a more detailed mitigation package focused around the provision of a full sized floodlit 3G artificial grass pitch (AGP) at nearby Forest Hall School. Details of the mitigation proposals have now been set out in the agent's letter and supporting documents. I would therefore wish to update our position on the planning application in response to the applicant's submission.

Forest Hall School Artificial Grass Pitch

A full size floodlit AGP is proposed at Forest Hall School in nearby Stansted Mountfitchet and the feasibility study undertaken by the applicant has demonstrated that the facility could in principle be delivered on the school's site. Engagement with the Burnt Mill Academy Trust and the District Council has indicated that the school would welcome the facility on their site and that it could operate alongside the existing leisure centre. A 3G AGP on this site would offer the following potential benefits:

- The AGP would provide a modern all weather surface that would be capable of intensive use throughout the year for matches, training and coaching. The AGP would be capable of accommodating a range of football pitches and would be suitable for both matches and training. The design and layout of the AGP would be expected to accord with the Football Association's design guidance which would help ensure that a fit for purpose facility that is suitable for meeting community needs would be implemented in practice.
- In relation to benefits for Forest Hall School, the AGP would provide an all weather facility that could be used for meeting the school's curricular and extra-curricular PE and sport needs and offer continuity of facility provision when natural turf pitches are unavailable due to ground conditions.
- Uttlesford District Council's Playing Pitch Strategy (2019) identified that the district had no 3G AGPs at the time that the strategy was prepared and there was a district-wide deficiency of four AGPs with a 3G surface suitable for meeting community football training and match needs that will increase to five in the future. The strategy identified that the Stansted Mountfitchet analysis area had a deficiency of one 3G AGP. More specifically, the strategy's action plan has identified Forest Hall School as a suitable site for meeting the identified need for 3G AGPs in the Stansted Mountfitchet analysis area and the surrounding

Rural analysis area. No alternative options for meeting 3G AGP needs have currently been identified in this area of the district. The Uttlesford Local Football Facilities Plan (LFFP)

this area of the district. The Uttlesford Local Football Facilities Plan (LFFP) <https://localplans.footballfoundation.org.uk/local-authorities-index/uttlesford/uttlesford-executive-summary/> that was prepared alongside the Playing Pitch Strategy for the Football Foundation has confirmed the need for additional AGPs in the Stansted Mountfitchet area and the Forest Hall School site has been specifically identified in this LFFP as a priority scheme for meeting needs.

- The facility would offer potential for helping to meet both the match and training needs of the two local football clubs, Stansted FC and Elsenham Youth FC. It may also help towards relocating Elsenham Youth FC's activities that would be displaced from the application site following its closure for development. I have consulted the Essex County FA which have advised that they are supportive in principle of a 3G AGP at Forest Hall School forming the principle element of a mitigation package if design, operational and delivery considerations could be addressed.

However, despite the above benefits the feasibility study has shown that whichever option is pursued for siting an AGP on the Forest Hall School site, a large proportion of the school's natural turf playing field area would be lost to accommodate the facility which may further reduce the supply of natural turf playing pitches in an area that already has shortfalls. As the proposal is still at the feasibility stage there are also a lack of certainty about the deliverability of the project given that it does not have planning permission although it is noted that the pre-application advice provided by Uttlesford District Council indicates that the proposal would be considered acceptable in principle. The proposal could only provide an acceptable mitigation solution if significant community use of the facility outside of school hours could be formally secured through a community use agreement and if an acceptable pricing policy, hours of use, programme of use and sinking fund could be secured in practice. There is no detail available at this stage on any of these matters. Notwithstanding this, it is welcomed that the draft Heads of Terms for a section 106 agreement proposes to seek to address some of the issues in relation to the delivery and operation of the AGP e.g. through planning permission being secured prior to implementation of the planning application on the existing playing field and the Community Use Agreement principles document being agreed to provide a framework for a subsequent community use agreement. The proposal in the draft Heads of Terms for details of an alternative playing field mitigation scheme to be provided as a contingency for the AGP project not securing planning permission or not being implemented is also welcomed.

Elsenham Recreation Ground Playing Field Improvement Scheme

As a secondary element of the mitigation package it is proposed to improve the quality of the playing fields at Elsenham Recreation Ground. This is Elsenham Youth FC's principal playing field that contains four football pitches of different sizes. Uttlesford District Council's Playing Pitch Strategy and the Uttlesford Local Football Facilities Plan has identified that improving the quality of the football pitches on this site would be a priority as the current quality is considered to be poor and some of the pitches are overplayed. Potential drainage improvements for example combined with an enhanced maintenance programme may for instance allow more matches/training sessions to take place on the pitches which in turn would help compensate for the loss of part of Forest Hall School's playing field to accommodate the proposed AGP. Such improvements may also help towards relocating Elsenham Youth FC's activities that would be displaced from the application site following its closure for development. However, as no feasibility has been undertaken to date to assess the options for improving the playing field the scope of such improvements is unknown as well as the delivery timescales.

Elsenham Youth FC Relocation Scheme

The commitment to agreeing a relocation scheme for Elsenham Youth FC as part of the Heads of Terms for the section 106 agreement is welcomed because in principle this may allow the club's current use of the playing field on the application site to be transferred to other sites prior to the site being closed which would provide continuity of pitch provision for the club. However, as no detail is available at this stage it is uncertain whether there are alternative venues that could satisfactorily accommodate the club's needs (without displacing other users) or if the relocation scheme would need to be focused on the proposed 3G AGP at Forest Hall School and/or the improvements to Elsenham Youth FC which may not be delivered in time.

Conclusion

The principle of the mitigation package that is now being offered by the applicant is welcomed for the reasons set out above. If delivered, a 3G AGP on the Forest Hall School site, significant qualitative improvements to Elsenham Recreation Ground and a relocation scheme to provide transitional arrangements for Elsenham Youth FC could collectively offer significant football related benefits and respond positively to the priorities in the District Council's Playing Pitch Strategy and the Football Foundation's LFFP. The Football Foundation and the Essex County FA also welcome the principle of the mitigation package. Sport England also acknowledges that the playing field on the application site has poor quality pitches due to their drainage, has no supporting facilities (other than the containers provided by Elsenham Youth FC) and has limited security of tenure for Elsenham Youth FC due to the short term lease

and break clause position. However, despite the mitigation package progressing positively since our initial response to the consultation was provided I have the following concerns:

- **Forest Hall School 3G AGP Delivery:** While the applicant has agreed to secure planning permission for the 3G AGP prior to implementation of the development on the application site's playing field, the applicant is unable to commit to delivering the project prior to implementing the development on the application site playing field. Even if a 3G AGP or an acceptable alternative project could secure planning permission, without a section 106 agreement making provision for its delivery in advance of development starting on the application site there is no certainty that the principal mitigation project would be delivered within an acceptable timescale or that continuity of playing field provision in the Stansted area would be maintained. This is pertinent given that the Forest Hall School site is not within the applicant's control and it would be difficult to see what effective enforcement action the District Council could take against the applicant to deliver the mitigation after the existing playing field has been lost to development. Sport England has had experience of playing field mitigation projects being delivered several years after a playing field has been lost to development or not being delivered at all where a section 106 agreement has not required that the mitigation is delivered in advance of the existing facility being lost. Furthermore, a scenario could arise where the proposed 3G AGP does not secure planning permission in which case there may not be a deliverable project for mitigating the loss of the playing fields. While the Heads of Terms makes provision for details of an alternative project to be provided as a contingency, there is no certainty that an acceptable alternative project could be identified in practice, and if it could, whether it could secure planning permission (if required) and be delivered within an acceptable timescale;
- **Elsenham Recreation Ground Playing Field Improvement Scheme Scope and Delivery:** While the applicant has committed to preparing a feasibility study to assess the options for improving Elsenham Recreation Ground, as the feasibility has not been prepared to date it is unclear what the scope or benefits would be of any improvements scheme and whether the applicant would agree to deliver such a scheme. It is also unclear what the timescales would be for delivering any such scheme. Due to this lack of detail, limited weight can be given to this element of the mitigation package at this stage. However, as this element of the mitigation scheme is essential for compensating for the loss of natural turf playing field provision across both the application site and the Forest Hall School site (if the 3G AGP is delivered) such detail is needed.
- **Elsenham Youth FC Relocation Scheme Detail:** While the applicant has confirmed that the relocation scheme would be agreed as part of the section 106 agreement and delivered prior to any development on the application site's playing field, as no details of the relocation scheme are available at this stage it is unknown whether an acceptable relocation scheme can in principle be identified. Furthermore, the relocation scheme may be focused around the delivery of the 3G AGP and/or the qualitative improvements to Elsenham Recreation Ground which the applicant is unable at this stage to commit to delivering in advance of development commencing.

Even if all of the above concerns had been addressed, Sport England would have to make a departure from our Playing Fields Policy to support the planning application on the basis of exceptional circumstances for the reasons explained in our initial formal response. A full understanding of the scope of the mitigation package plus acceptable delivery

proposals would be necessary for such exceptional circumstances to apply.

In view of the above considerations I would therefore have to advise that Sport England's objection to the planning application is maintained although as set out above the principle of the mitigation package is welcomed and recognition is given to the quality and security of tenure considerations applying to the playing field that would be lost. Without prejudice to this position, if the District Council is minded to resolve to approve the application contrary to this advice I would request that any resolution is subject to a section 106 agreement being completed that includes the draft Heads of Terms enclosed (Enclosure 3) with the applicant's letter relating to the 'Football Pitch Mitigation Scheme'. I would also request that Sport England is engaged by the District Council on the detailed wording of the section 106 agreement and the various documents that will need to be prepared to support the delivery of the proposed terms that have yet to be agreed such as the 'Minimum Facility Specification' for the 3G AGP, the 'Community Use Agreement Principles' and the 'Elsenham Youth FC Relocation Scheme'. This engagement is considered necessary so that Sport England can provide the District Council with specialist advice on these matters in order to help ensure that the mitigation package that is secured through the section 106 agreement is acceptable in practice.

If the Council is minded to approve the application, contrary to the above advice, I would advise that on this occasion the Town and Country Planning (Consultation) (England) Direction 2021 would not be applicable i.e. the application would not need to be referred to the Secretary of State, via the National Planning Casework Unit. This is because the playing field on the application site is privately owned. The Direction only applies to land (playing fields) that is owned by local authorities or educational institutions (or land used in the last 5 years by educational institutions).

If this application is to be presented to a Planning Committee, we would like to be notified in advance of the publication of any committee agendas, report(s) and committee date(s). We would be grateful if you would advise us of the outcome of a future committee meeting that would determine this application.

If you would like any further information or advice please contact me.

Yours sincerely

Roy Warren
Planning Manager

Urban Design

From: [Jack Bennett](#)
To: [Planning](#)
Cc: [Maria Shoesmith](#)
Subject: Northside consultation response UTT/22/0434/OP
Date: 14 March 2022 13:12:40
Attachments: [Outlook-5ii5z3yv.png](#)

Hello there, please see urban design consultation response for UTT/22/0434/OP.

The size and nature of the typology of proposed buildings including associated highways and servicing requirements, the construction materials associated with this type of building i.e. concrete and steel, the site constraints in terms of existing buildings, and the proximity of Stansted airport in terms of unsuitability for other uses and restrictions on green infrastructure, all combine to pose challenges for conventional placemaking/sustainable building but are generally outside of the applicant's control. The scheme does include positive features which work towards meeting these challenges, including provision of design code, which needs to be conditioned to ensure compliance at reserved matters stage. Low-carbon modular timber structural systems for this typology of building should be included in the design code, to guide subsequent reserved matters applications in the direction of net zero carbon construction which does not rely only upon carbon off-setting.

Many thanks,

Jack Bennett

Principal Urban Design Officer
Uttlesford District Council
London Road
Saffron Walden
Essex
CB11 4ER

From: [Jack Bennett](#)
To: [Planning](#)
Cc: [Maria Shoemith](#); [Lois Bowser, Principle Planning Officer - New Settlements](#)
Subject: Northside consultation response UTT/22/0434/OP - ADDENDUM
Date: 05 April 2022 15:05:33
Attachments: [Outlook-g2efnbln.png](#)

Further to submitted urban design consultation summary, see addendum below detailing design comments on the above application:

As detailed in the summary, the main concern is how to achieve good human scaled placemaking within the constraints of large buildings with small ratios of active frontages, large areas of car parking, large roads, and greatly reduced SUDs, green infrastructure, and trees. The overall approach of this scheme is very much a zoned out-of-town place that encourages car use, rather than a walkable place that has a finer grain of mixed-uses encouraging active travel. Having said that, the scheme does include/suggest design and sustainability aspects that are markedly better (in the context) than the average, and that is noted.

Active and sustainable travel

On the street scene, there is no cycle infrastructure (cycle lanes, stands, junctions, crossings) shown, nor any pedestrian infrastructure such as crossings, paths which continue over junctions etc. Raised tables could be used wherever possible depending on the grade of street, potentially not possible where HGVs are involved. Highways to confirm, but EDG street types B, C, and D specify 3m wide verges, street trees, and buses able to stop in carriageway which may enable 3 lanes to reduce to 2.

In sustainability statement, 'where possible' to be removed from the following statement: *'The development will be designed to incorporate the following measures ~~where possible~~ to ensure a highly energy efficiency, low carbon and 'future proofed' building'.*

Detail needs to be included in design code re. bus stops to specify seating, weather protection, real-time information board, refuse bins, landscaping etc.

Central pedestrian refuge must be included where required rather than 'will be considered'. Ditto for raised tables where compatible with highways and HGV requirements. Continue materials and level over junctions to maintain pedestrian hierarchy wherever possible. Footpath continuity over junctions where possible. High quality materials such as pavers etc will likely be limited to key entrances and public realm, but buff/light coloured tarmac should be considered to raise quality of materials where possible, shared cycle/footpath would be appropriate in this material.

Landscaping

The applicant should demonstrate more innovative and ambitious ways that we can include greenery in the context. All options should be explored and tested before taken off the table due to aerodrome safety. Green walls which could provide some vital greenery were suggested, as were rills which could be above-ground depressions formed of granite setts or similar that run alongside footways and direct rainwater away, rather than being directed straight into plastic underground - the water would not be standing. There are many more ideas that could be explored including SUDs which don't have standing water but do slow the flow of surface water via planted verges.

The below must be caveated by making clear that urban design is not the relevant

consultee in the area of safeguarding aerodromes. Any proposals in this regard will need to be agreed with the relevant authority on aerodrome safety. The Safeguarding of Aerodromes (CAP 738) document mentions (para 3.22) that 'building design including large area of flat or shallow pitched roof' may be deemed an 'unintended hazard' in the same category as SUDs, trees, other restricted landscaping and features. Does this mean that pitched roofs are less of a hazard? If some were achieved possibly for smaller buildings, or sawtooth industrial style pitches, would this reduce the risk in that area to enable a few more trees?

Likewise in Wildlife Hazard Management at Aerodromes (CAP 772 pg 24) it mentions that long grass seems to be less of a risk than short grass, could these mean opportunities for wildflower meadows (or at least wildflowers strips alongside footways, verges etc) rather than short-cropped grass which has little amenity or biodiversity value? Short-cropped grass generally should be reserved for areas that people might sit, verges and other unusable areas should generally be wildflowers or more robust quality planting/shrubs. Again, all this must be designed and agreed with the relevant authority on aerodrome safety.

Have the height envelopes been reviewed by the landscape officer?

Car parking should be hidden from view by buildings, soft landscaping, green walls, 'greened' fences etc as far as possible and the code should explore more detailed ways to achieve this.

Verges would be better (from a design point of view) between the footway and vehicular road, to buffer pedestrians from HGVs.

Need to define metric for minimum number of trees per given area in parking, usually 1 per 4 spaces but this will need coordination with safeguarding.

Building character

It will obviously be very difficult to build on any sort of local character or vernacular with these buildings and we should see the rationale behind colour choices and define some in the code. A more varied character throughout the site should be achieved, with distinct 'character areas' that could aid with wayfinding and break the site down to a more human scale. Character areas could be fairly simply defined around features such as the entrance 'gateway', main avenue, central amenity green, secondary 'streets' off main avenue etc. Variable character features could be roof forms, facade colour, signage graphics, materials, types of canopy, fenestration etc. The 'supergraphic' approach shown to signage is supported.

Can visual mass be broken down with stepping/inset facade elements as well as vertical panels. The shadows this would create would be more effective at breaking down the mass, whilst being fairly straightforward to achieve.

Design code states an architectural language 'appropriate to the aspirations of modern business' which is logical but does not consider local character nor local people's opinions. The code needs to explore what this looks like, and options, also for meaningful community engagement so local people can have more of a say on what this new place will be like.

As a minimum this code should explore possible colour schemes, combinations, detailing, etc, and highlight bad practice/colours to avoid, rather than state only colours/materials in

text.

Employee amenity greens - the design code should show some design principles that can be applied to any layout, and also some examples measured layouts which embody these principles and can inform RMAs. These will be vital spaces and code should explore detailed design options for these elements - they will be one of the main opportunities to improve the user experience of the place.

'Village green' - details/diagrams/images of what this means/could be/shouldn't be? Again, another key space that would benefit from some diagrams exploring how it might come together and establishing key design principles e.g. relationship to streets/built form, types of landscape 'rooms' and spaces, how different uses are incorporated, principles of access etc. Would suggest changing the name of the village green to something more urban and reflective of its true character.

Street enclosure

The principle of active frontages addressing public realm and creating enclosure of space needs to be followed as far as possible. On the street scene shown, the frontage on the right hand side of the street is much more successful, simply because the car parking is moved to the rear (or at least side) of the buildings - this enables the public realm to be addressed by soft landscaping and active frontages rather than a large car park as is the case on the opposite side of the street.

It is noted that the type and scale of building, and the parking required will not enable enclosure to the degree of a mixed-use high street for example, but areas of the scheme are more successful than others and the approach should be maximised.

For example, illustrative masterplan option 2 (pg. 5 of design code pamphlet) is a better option as the central amenity green could be enclosed by buildings rather than parking (if the square-ish building to the north of the green was flipped with its parking). Either way the amenity green should be enclosed with active building frontages and not car parking. Units 2 and 4 (on landscape drawing) successfully enclose the public realm and hide car parking, units 5,7,8,9,10 are semi-successful as the public realm is addressed by buildings but also parking. Could the car park at the front of unit 11 be shifted round the back or side for example?

In the design code drawings and diagrams (rather than only words) are required to demonstrate principles of: *Offices fronting the main road where possible, Segregated movement strategy for pedestrians and vehicles, Inward facing service yards where possible, Human scale will be considered with feature changes at a height of around 2.5m to provide a sense of human proportion to the ground level.*

The principle of drawings and diagrams being used rather than only words is set out in the National Model Design Code.

Sustainability

Ambitious targets for net zero carbon have been set out which is supported, and the design code should show how these might be achieved at reserved matters. E.g. what low embodied carbon materials are actually available for these kinds of buildings that aren't just concrete and metal? Would timber structure be feasible in select locations, and would the form/bays of the building need to change to accommodate this? In terms of passive design, again what approaches can be taken to buildings of this type, e.g. how should

habitable accommodation be thermally separated to ensure minimum space is being heated, how should solar shading be incorporated and on what facades etc. The design code should show ways that net zero carbon can be achieved through detailed design to guide applicants and officers at reserved matters. Please see LETI commercial design guide [252d09_0b2d7fb1e19d46ceb4701ec911e0656b.pdf \(leti.london\)](#). This guide is not adopted or endorsed by UDC but is useful guidance, nonetheless.

Requested in the design code detailed measured examples of design measures that can be taken at reserved matters stage to help meet BREEAM outstanding e.g. daylight level, walking/cycling facilities, water recycling, etc. Officers will need to know exactly what to look and ask for rather than only high-level principles. Can some more best practice office design principles/example layouts be explored and demonstrated e.g. naturally lit spaces, communal spaces for well-being, details of user-controlled environmental controls such as shading etc.

Please see a product/system that could be referenced in the design code: [Industrial buildings - Building concepts | Stora Enso](#) It's a product for industrial/commercial buildings made from wood, lowering the embodied carbon in construction, other products are available. Some of the examples could be included in the design code, and layout principles/setting out dimensions allowed for. We would not be specifying/stipulating the system at this stage but including this useful information could inform reserved matters applications. This would enable improved and more reliable carbon reductions, on top of the carbon offsetting which is being allowed for.

Early Years

More details, diagrams, precedents, measured layouts required to show how early years will be an exemplar designed facility and provide a safe and healthy environment for parents, children and early years practitioners taking into account large highways, pollution, active travel challenges, noise etc.

Jack Bennett

Principal Urban Design Officer
Uttlesford District Council
London Road
Saffron Walden
Essex
CB11 4ER

UDC Environmental Health

Environmental Health Consultee Comments for Planning

Application Number: UTT/22/0434/OP - Outline application for demolition of existing structures and redevelopment of 61.86Ha to provide 195,100sqm commercial / employment development predominantly within Class B8 with Classes E(g), B2 and supporting food retail/ food/beverage/nursery uses within Classes E (a), E(b) and E(f) and associated access/highway works, substation, strategic landscaping and cycle route with matters of layout, scale, appearance

Land North of Stansted Airport
Essex

Lead Consultee

Name: Andy Luck
Title: Senior EHO
Tel: x 540

Email: aluck@uttlesford.gov.uk

Date: 24th March 2022

Comments

The site is currently used for a mixture of Airport related services, storage and distribution, aircraft hangars and stands, and is part of the historic and redundant Stansted Airport site. The Proposed Development will be phased and is due to be completed in 2028 with the first unit open by 2024.

Due to the nature, size, location, and proximity of the proposed development to existing residential dwellings there is the potential for adverse impact to the environment and human health. This applies both during the construction phase and from the commercial activities and increased traffic movements after its completion.

The potential receptors include the existing residential properties and park homes to the east, west, north, and northeast of the proposed site. There are also potential receptors which will be introduced as part of the development such as Hotel, and office accommodation and the proposed school nursery.

The application is at outline stage and has been supported by a significant amount of documentation. This includes an Environmental Statement prepared by Trivium on behalf of the applicant Threadneedle Curtis Limited which this service has referenced in making this response and in particular Chapter 5: Demolition and Construction, Chapter 8. Noise and Vibration,

Chapter 9. Air Quality, and Chapter 16. Ground Conditions, and Chapter 19: Environmental Management, Mitigation and Monitoring Schedule.

The overall conclusion is that this service has no objection in principle to this development. However due to the scale and complexity of the scheme there will need to be suitable conditions attached to any consent granted at the reserve matters stage to ensure that there are no adverse environmental impacts arising from both the construction phase and the completed development. To this end we would recommend that there is liaison between the Councils planners to draft and secure appropriate conditions.

Notwithstanding the above there are some initial specific comments regarding the main areas to be considered.

Noise and vibration

Baseline noise surveys have been conducted in 2015 and 2017 to establish the existing conditions at and around the site. The monitors were located at key positions on the site boundary to be representative of existing residential accommodation. The 2017 survey positions were agreed at the time with the Council. It is considered that these surveys remain representative of the baseline noise climate and do not need to be repeated, and are therefore the data is suitable for assessment of the noise impacts of the Proposed Development

Necessary mitigation measures will need to be implemented to reduce or prevent potential health impacts associated with the demolition and construction phase of the Proposed Development and the activities arising from the completed scheme.

The key considerations in relation to the noise and vibration assessment will be as follows: -

The implementation of good practice construction noise and vibration control (through the use of best practicable means). Preliminary construction noise and vibration assessments will need to be undertaken assuming no mitigation control and then reviewed to the magnitude of noise and vibration impacts from other introduced sources.

The following will need to be considered.

- Noise and vibration from operational B8 (distribution) use on site, specifically vehicle movements, loading/unloading etc.
- Noise and vibration from Operational B2 (general industrial); - Fixed plant noise; and –
- Changes in noise level alongside roads due to changes in traffic flow on those roads.

The aim would be to set noise limits from fixed plant for all of the proposed uses and the operation of the general industrial use is which are 5 decibels (dB) below the measured background noise level during the day and evening (06:00-23:30) and night time (23:30-06:00) periods, with a further penalty for any plant/activities that exhibits attention attracting characteristics likely to be audible at receptors, in accordance with British Standard (BS) 4142:2014+A1:2019 guidance³⁰. It is considered that this would adequately safeguard the existing residential amenity

An outline code of construction practice is provided within Volume 2, Appendix: Noise and Vibration – Annex 4. It is suggested that the measures contained within this outline code of construction practice be discussed and agreed to via planning condition at the reserve matters stage to be incorporated into a Construction Environmental Management Plan (CEMP).

Contaminated Land

This has been considered and is outlined in Chapter 16: Ground Conditions. An initial Desktop study has been undertaken to assess the potential extent and receptor pathways of land contaminants.

The following receptors have been considered within this assessment:

Existing Receptors

Human Health

- Current site users (Low Sensitivity);
- Maintenance workers (High Sensitivity); and
- Contractors (High Sensitivity).

Controlled Waters

- Shallow groundwater within the Made Ground (Low Sensitivity);
- Lowestoft Formation (Secondary Undifferentiated Aquifer) (Low Sensitivity);
- Glacial and Kesgrave Sands and Gravels (Secondary (A) Aquifer) (Medium Sensitivity);
- Surface water features – Balancing Pond A (Low Sensitivity); and
- Surface water features – Pincey Brook, Bury Lodge Stream, Great Hallingbury Brook and the River Stort (High to Medium Sensitivity).

Introduced Receptors

Human Health

- Future site users (Low Sensitivity);

- Maintenance workers / contractors (High Sensitivity); and
- Demolition and construction workers (High Sensitivity).

Other (Below Ground Services)

- Potable water supply pipes (High Sensitivity); and
- Buried concrete (High Sensitivity).

The baseline conditions have been summarised with details provided in the Volume 2, Appendix: Ground Conditions – Annex 1 of the Environmental statement.

There are proposed mitigation, monitoring and residual measures to mitigate the potential effects to current site users and worker in the demolition and construction phase and to break any pollutant linkages.

In particular the completion of a Phase 2 Contaminated Land Ground Investigation and the production of a Generic Quantitative Risk Assessment (GQRA) to assess the ground current conditions and the extent of any contamination present within the site; and to facilitate ground gas monitoring and confirm the ground gas regime.

Any areas of identified contamination will need to be identified and then appropriately remediated or mitigated. This could be in the form of removal off site, treatment, or mitigation employed such as the placement of a clean soil cover layer to form a suitable barrier in accordance with BRE Report 465 ('Cover systems for land regeneration – thickness of cover systems for contaminated land')¹¹. This would need to be completed under a Remediation Method Statement and verified in a Validation Report. The Validation Report will be required to ascertain that the remediation measures (if required) have been undertaken satisfactorily and that the site no longer represents a risk when the Proposed Development is completed.

This will need to be conditioned at the reserve matters stage.

Air Quality

The applicant has submitted an Environmental Statement: Vol 1, Chapter 9: Air Quality report which discusses likely impacts to the Bishop Stortford AQMA and Ecological sites (ancient woodland). Mitigation has been discussed including pollutant management during construction, travel plan, barriers to protect woodland and monetary contributions for transport related measures to reduce emissions. The report is broadly acceptable, however, East Herts District Council must be consulted on the air quality proposals affecting their AQMA in Bishop Stortford.

The following broad mitigations has been proposed by the applicant:

- The Dust Management Plan, to be incorporated into the wider CEMP, which will include measures to control other emissions.
- Prepare a comprehensive Travel Plan- The Travel Plan will identify sustainable modes of travel to/ from the Proposed Development from the surrounding areas, including Bishop's Stortford, and will include measures such as walking and cycling and links with existing bus services. Additionally, shuttle bus services will be provided between the Proposed Development and the Stansted Airport Interchange. The Travel Plan will also consider the transition to electric vehicles and suitable electric charging points will be provided as part of the Proposed Development. A survey of staff locations and method of travel to work will be carried out once the Proposed Development is fully operational to identify whether the numbers of vehicles for staff travel as a percentage of the overall staff movement are similar to those predicted. Where necessary, a package of sustainable transport measures would be subsequently introduced to encourage sustainable modes of travel for staff as outlined in the Travel Plan.
- The monetary cost derived by the damage cost calculations (detailed in Paragraph 9.86 in the ES Air Quality Chapter) will also contribute to sustainable transport related mitigation measures which would be included within the Travel Plan and the use of that funding would be agreed and monitored through the travel plan.
- Build a solid fence with further vegetated barrier (further information provided in ES Volume 1, Chapter 4: The Proposed Development), aimed at mitigating effects to pollutants on the ancient woodland sites (Stocking Wood and Round Coppice) as well as restorative management.

These proposals are welcome and may be secured by condition as more specific details are known about the development.

The applicant is relying on long-term air quality improvements due to the increased uptake of electric vehicles across the UK, therefore, in support of this, further details for supplying electric vehicle charge points across the site needs to be supplied as more specific details are known about the occupiers of the development. The travel plan proposes that 20% of parking bays will have EV charging points and this service would recommend that an additional 40% will have capacity for future conversion. The travel plan also proposes a target to achieve a 10% decrease in single occupancy vehicle trips for employees as well as provision for motorised and non-motorised cycles including shower facilities etc (note that these should be covered spaces).

Energy saving and renewable technologies are being considered for this development (Sustainability Strategy) in the interests of carbon saving and energy efficiency and are welcomed as they will contribute to the overall reduction in pollutants.

Application Number: UTT/22/0434/OP - Outline application for demolition of existing structures and redevelopment of 61.86Ha to provide 195,100sqm commercial / employment development predominantly within Class B8 with Classes E(g), B2 and supporting food retail/ food/beverage/nursery uses within Classes E (a), E(b) and E(f) and associated access/highway works, substation, strategic landscaping and cycle route with matters of layout, scale, appearance

Land North of Stansted Airport
Essex

Lead Consultee

Name: Jane Mann
Title: Senior EHO
Tel: x 344



Date: 06 January 2023

I refer to the consultation response by Mr A Luck dated 24th March 2022. Having reviewed the application considering Mr Lucks comments I note that the indicative layout does not reflect good acoustic design and we recommend that a suitably qualified and competent acoustic consultant forms part of the design team in readiness of the reserved matters application.

I would recommend the following conditions are attached to any permission granted.

Contaminated Land

1. Land Contamination

The following works shall be conducted by competent persons and in accordance with the Essex Contaminated Land Consortium's 'Land Affected by Contamination: Technical Guidance for Applicants and Developers' and The Environment Agency Land Contamination Risk Management (LCRM) and other current guidance deemed authoritative for the purposes. The development hereby permitted shall not commence until the measures set out in the approved report have been implemented.

A. Site Characterisation

Notwithstanding the details submitted with this application, no development shall commence other than that required to carry out additional necessary investigation which in this case includes demolition, site clearance, removal of underground tanks and old structures until an investigation and risk assessment has been submitted to and approved in writing by the local planning authority. The risk assessment shall assess the nature and extent of any contamination on the site, whether or not it originates on the site. The investigation and risk assessment must be undertaken by competent persons

and a written report of the findings must be produced. The report of the findings must include:

- (i) a survey of extent, scale and nature of contamination;
- (ii) an assessment of the potential risks to:
 - Human health,
 - Property (existing or proposed) including buildings, crops, livestock, pets, woodland and service lines and pipes,
 - Adjoining land,
 - Groundwaters and surface waters,
 - Ecological systems
 - Archaeological sites and ancient monuments;
- (iii) an appraisal of remedial options, and proposal of the preferred option(s).

B. Site Remediation Scheme

The development hereby permitted shall not commence until a detailed remediation scheme to bring the site to a condition suitable for the intended use by removing unacceptable risks to human health, buildings and other property and the natural and historical environment has been submitted to and approved in writing by the local planning authority. The scheme must include all works to be undertaken, proposed remediation objectives and remediation criteria, timetable of works and site management procedures. The scheme must ensure that the site will not qualify as contaminated land under Part 2A of the Environmental Protection Act 1990 in relation to the intended use of the land after remediation.

C. Remediation Implementation and Verification

The development hereby permitted shall not commence other than that required to carry out the agreed remediation until the measures set out in the approved Remediation scheme have been implemented, unless otherwise agreed in writing by the Local Planning Authority. The Local Planning Authority must be given two weeks written notification of commencement of the remediation scheme works.

Following completion of measures identified in the approved remediation scheme, a verification report that demonstrates the effectiveness of the remediation carried out must be produced and is subject to the approval in writing of the Local Planning Authority.

D. Reporting of Unexpected Contamination

In the event that contamination is found at any time when carrying out the approved development that was not previously identified it must be reported in writing immediately to the Local Planning Authority. An investigation and risk assessment must be undertaken, and where remediation is necessary a remediation scheme must be prepared submitted for the approval in writing of the Local Planning Authority.

Following completion of measures identified in the approved remediation scheme a verification report must be prepared, which is subject to the approval in writing of the Local Planning Authority.

E. Long Term Monitoring and Maintenance

If found to be necessary from the Phase 2 investigation and remediation scheme, a monitoring and maintenance scheme to include monitoring the long-term effectiveness of the proposed remediation over a period of time to be agreed with the Local Planning Authority, and the provision of reports on the same must be prepared, both of which are subject to the approval in writing of the Local Planning Authority.

Following completion of the measures identified in that scheme and when the remediation objectives have been achieved, reports that demonstrate the effectiveness of the monitoring and maintenance carried out must be produced and submitted to the Local Planning Authority.]

Reason

To ensure that the proposed development does not cause harm to human health, the water environment and other receptors in accordance with Policy GEN2 ENV12 and ENV14 of the Uttlesford Local Plan (adopted 2005).

Unexploded Ordnance (UXO)

A detailed assessment of the potential for unexploded ordnance (UXO) at the site and a UXO risk assessment shall be undertaken by a competent person further to the recommendations of the submitted Environmental Statement, Volume 1 chapter 16 Ground Conditions, section 16.61. Any recommendations for further investigation and/or mitigation in the UXO assessment shall be fully implemented.

Reason

To ensure that the proposed development does not cause harm to human health, the water environment and other receptors in accordance with Policy GEN2 ENV12 and ENV14 of the Uttlesford Local Plan (adopted 2005).

Construction works

In view of the scale of the development as proposed, it is recommended that the following Construction Environmental Management Plan is attached to any consent

granted to ensure that construction impacts on adjacent residential occupiers are suitably controlled and mitigated:

Prior to the commencement of the development, a detailed Construction Environmental Management Plan (CEMP) shall be submitted to and approved in writing by the Local Planning Authority, and the plan shall include the following:

- a) The construction programme and phasing
- b) Hours of operation, delivery and storage of materials
- c) Details of any highway works necessary to enable construction to take place
- d) Parking and loading arrangements
- e) Details of hoarding
- f) Management of traffic to reduce congestion
- g) Control of dust and dirt on the public highway
- h) Details of consultation and complaint management with local businesses and neighbours
- i) Waste management proposals
- j) Mechanisms to deal with environmental impacts such as noise and vibration, air quality and dust, light and odour.
- k) Details of any proposed piling operations, including justification for the proposed piling strategy, a vibration impact assessment and proposed control and mitigation measures.

The CEMP shall be consistent with the best practicable means as set out in the Uttlesford Code of Development Practice.

All works shall be carried out in accordance with the approved CEMP thereafter.

REASON: In the interests of the amenity of surrounding locality residential/business premises in accordance with Policies GEN1, GEN2, and GEN4 of the Uttlesford Local Plan (adopted 2005).

External Lighting

To ensure that any external lighting is properly designed and installed to avoid any adverse impacts on residential neighbours from obtrusive or spillover light, or glare, the following condition is recommended:

Prior to the installation of any external lighting, details of all proposed external lighting to be installed on the site, including the design of the lighting unit, any supporting structure, and the extent of the area to be illuminated, shall be submitted to and approved in writing by the Local Planning Authority. Only the details thereby approved shall be implemented.

At all times the lighting scheme shall conform to The Institution of Lighting Engineers Guidance Note 01/21 for The Reduction of Obtrusive Light.

REASON: To protect the amenities of the occupiers of adjoining properties in accordance with ULP Policies ENV11, GEN2 and GEN4 of the Uttlesford Local Plan (adopted 2005).

Illuminated signs

Details of any illuminated signs to be installed on the site, including the design and illuminance levels shall be submitted to and approved in writing by the Local Planning Authority prior to the signs being brought into use. The signs shall be installed in accordance with the approved details.

The illuminated signs shall comply with the Institution of Lighting Engineers Professional Lighting Guide 05, The brightness of Illuminated Advertisements.

REASON: To protect the amenities of the occupiers of adjoining properties in accordance with ULP Policies ENV11, GEN2 and GEN4 of the Uttlesford Local Plan (adopted 2005).

Waste Management

Prior to the first use of the buildings for the purposes hereby approved a scheme for the means of refuse storage including details of any bin stores shall have been submitted to and approved in writing by the local planning authority. The agreed scheme shall be implemented prior to the first occupation of the development and retained for such purposes at all times thereafter.

The operational site waste management strategy shall be in accordance with the Essex County Council and Southend-on-Sea Borough Council Waste Management Plan including mitigation methods to control noise and odour from the waste storage and collection arrangements and pest control measures.

REASON: To protect the amenities of the occupiers of adjoining properties in accordance with ULP Policies ENV11, GEN2 and GEN4 of the Uttlesford Local Plan (adopted 2005).

Air Quality

1. Prior to the commencement of development on each plot or phase, details of the proposed use and operation for each commercial unit/plot together with an updated associated Highway Assessment and Air Quality Assessment shall be submitted to and approved in writing by the Local Planning Authority and thereafter implemented in accordance with the approved details.

REASON: In the interest of protecting the residential amenity, highways and pedestrian safety and air quality from unacceptable levels of increased vehicle movements in accordance with Policy GEN1, GEN2 and GEN4 of the Uttlesford Local Plan (adopted 2005).

2. No development shall take place until a scheme, informed by an appropriate air quality assessment, for protecting local air quality and the Bishops Stortford Air Quality Management Area from adverse impacts associated with the commercial and industrial uses hereby approved has been submitted to and approved in writing by the local planning authority. No occupation of the units hereby consented shall take place until such a scheme has been implemented in accordance with the approved details and it shall be retained in accordance with those details thereafter.

Reason: To protect human health and the amenity of local residents, and prevent any adverse impacts on the Bishops Stortford Air Quality Management Area.

Electric Vehicle Charging Points

3. Electric vehicle charging points (EVCP) shall be provided for 20% of the car parking spaces and passive provision shall be made available for the remaining 80% of the spaces in the development, so that the spaces are capable of being readily converted to electric vehicle charging points. The location of the EVCP spaces and charging points, and a specification for passive provision shall be submitted to and approved in writing by the local planning authority before any of the residential units are first brought into use. The EVCP shall thereafter be constructed and marked out and the charging points installed prior to any of the residential units being brought into use and thereafter retained permanently to serve the vehicles of occupiers.

Reason: To protect local air quality and residential amenity of existing neighbouring and future occupiers of the development.

4. Development shall not commence until details of an air quality barrier scheme to provide mitigating effects to pollutants on the ancient woodland sites (Stocking Wood and Round Coppice), as well as restorative management, is submitted for approval in

writing by the local planning authority. The approved scheme shall be implemented in full and maintained thereafter.

Reason: To protect the ancient woodland sites from adverse air pollution effects from the development.

5. Development shall not commence until a Travel Plan has been submitted to the Local Planning Authority and approved in writing. The approved Travel plan shall be fully implemented and maintained thereafter.

Reason: To protect local air quality and residential amenity of existing neighbouring and future occupiers of the development.

Primary Electricity Sub Station

Prior to development commencing for the Electricity Sub Station hereby approved a noise impact assessment must be conducted by a competent person to assess the potential noise impact of the substation on noise sensitive receptors (e.g. hotel, residential, nursery). Noise from the substation shall be assessed in accordance with BS4142:2014+A1 2019 and any other relevant published procedure or assessment method (subject to local authority approval). Particular attention shall be given to directional and low frequency impact at times of low background levels.

If required, a mitigation scheme to control noise from the substation shall be submitted for written approval. The works shall be carried out in accordance with the approved report shall be retained as such thereafter.

REASON: To protect the amenities of the occupiers of adjoining properties in accordance with ULP Policies ENV11, GEN2 and GEN4 of the Uttlesford Local Plan (adopted 2005).

Nursery and other noise sensitive premises

Noise sensitive premises (nursery) may be adversely affected by road, aircraft, industrial and commercial noise impacts. I would advise the following condition is attached;

The development hereby approved shall not commence until a report identifying those noise sensitive premises within the development that require mitigation of external noise levels and detailing the mitigation required to achieve satisfactory noise levels within those premises (and to their external amenity areas, where relevant) has first been submitted to the Local Planning Authority in writing to be agreed. The report shall also detail the arrangements for ventilating the premises so identified. The development shall be carried out in accordance with the report so agreed and shall be retained as such thereafter.

Reason: To ensure that potential adverse noise impacts to noise sensitive premises within the development are mitigated and to ensure a high standard of amenity for future occupiers

Industrial/commercial Noise Impacts

Plant noise

For each of the permitted commercial and industrial units hereby approved, prior to the installation of any plant, machinery or equipment the details of such shall be submitted to and approved in writing by the Local Planning Authority.

A noise impact assessment must also accompany the submission and include noise emissions from the equipment and mitigation measures to be incorporated. The sound levels shall be assessed in accordance with BS4142:2014+A1 2019 (Or latest equivalent version). The sound emitted must be measured (or calculated if measurement is not possible) at 1.0m from the facade of all residential premises to demonstrate that the sound emitted by the cumulative operation of all external building services plant and equipment hereby permitted does not exceed 5db below the background noise level at any time when the plant is operating. The noise survey must include reference to measured background noise level at monitoring locations and times agreed by the Local Planning Authority. Measurement parameters must include the LA90, LAeq, LA Max and frequency analysis.

Any scheme of mitigation shall be implemented in accordance with the approved details and it shall be retained in accordance with those details thereafter.

Should the plant and equipment fail to comply with this condition at any time, it shall be switched off and not used again until it is able to comply. The use of the equipment must not commence or re-commence until a fully detailed noise survey and report has been submitted to and approved in writing by the Local Planning Authority and approved mitigation measures have been implemented. The plant and equipment shall be serviced regularly in accordance with manufacturer's instructions and as necessary to ensure that the requirements of the condition are maintained at all times.

REASON: To protect the amenities of the occupiers of adjoining properties in accordance with ULP Policies ENV11, GEN2 and GEN4 of the Uttlesford Local Plan (adopted 2005).

Within 3 months from the hereby approved permission, to establish background noise levels in vicinity of the development a representative survey shall be undertaken in accordance with BS 4142:2014+A1:2019 and/or the most suitable method to fully represent any noise source and impact at the boundary of the nearest noise sensitive properties. This shall be undertaken by a suitably competent person. The noise sensitive property locations shall be submitted for written approval by the Local Planning Authority. The noise survey results shall be submitted for written approval of the representative background noise levels for each of the noise sensitive receptors at the reserved matters application stage.

Background noise levels shall be established for the following periods:

- Daytime 0700 to 1900
- Evening 1900 to 2300
- Night 2300 to 0700

REASON: To protect the amenities of the occupiers of adjoining properties in accordance with ULP Policies ENV11, GEN2 and GEN4 of the Uttlesford Local Plan (adopted 2005).

Prior to operation a post completion noise survey must be undertaken by a suitably qualified acoustic consultant, and a report submitted to and approved in writing by the Local Planning Authority. Where the proposed or actual plant and equipment rated noise levels are predicted to be in excess of 5 dB(A) above background noise levels a noise mitigation scheme shall be implemented.

REASON: To protect the amenities of the occupiers of adjoining properties in accordance with ULP Policies ENV11, GEN2 and GEN4 of the Uttlesford Local Plan (adopted 2005).

Hours of Operation

Prior to the first occupation of the non-residential units hereby permitted, details of the hours of operation shall be submitted to and approved in writing by the Local Planning Authority. The non-residential units shall thereafter be occupied solely in accordance with the approved details.

REASON: To protect the amenities of the occupiers of adjoining properties in accordance with ULP Policies ENV11, GEN2 and GEN4 of the Uttlesford Local Plan (adopted 2005).

Road traffic noise impacts.

No development shall take place until a scheme for protecting the existing noise sensitive premises from noise from road traffic changes resulting from the development, including increases in road traffic, changes to road layouts, roundabouts and new road crossings has been submitted to and approved in writing by the local planning authority. The approved development shall not be brought into use until the scheme has been implemented in accordance with the approved details, and shown to be effective, and it shall be retained in accordance with those details thereafter.

REASON: To protect the amenities of the occupiers of adjoining properties in accordance with ULP Policies ENV11, GEN2 and GEN4 of the Uttlesford Local Plan (adopted 2005).

Industrial/commercial operational noise impacts (excluding fixed plant noise)

No development shall take place before a noise impact assessment and noise mitigation scheme for noise from all non- residential uses hereby approved (including industrial, commercial, retail, leisure and manufacturing processes, mobile plant and equipment, loading and unloading of goods and materials and any other noise source associated with the use hereby permitted) has been submitted to, and approved in writing by the Local Planning Authority. The approved scheme shall be implemented before the use/operation commences and be thereafter operated in accordance with the approved details.

REASON: To protect the amenities of the occupiers of adjoining properties in accordance with ULP Policies ENV11, GEN2 and GEN4 of the Uttlesford Local Plan (adopted 2005).

Service yard management

No development shall commence until a Service Yard Management Plan has been submitted to and approved in writing by the Local Planning Authority. Such a management plan shall identify measures to control noise emanating from the service yards. The approved plan shall be implemented at all times .

REASON: To protect the amenities of the occupiers of adjoining properties in accordance with ULP Policies ENV11, GEN2 and GEN4 of the Uttlesford Local Plan (adopted 2005).

Odour/fumes industrial/commercial

No development shall take place before a scheme detailing all plant, machinery, chimneys, ducting, filters or extraction vents to be used in connection with the uses hereby approved have been submitted to, and approved in writing by the Local Planning Authority. The scheme shall be implemented prior to the use commencing and retained thereafter.

REASON: To protect the amenities of the occupiers of adjoining properties in accordance with ULP Policies ENV11, GEN2 and GEN4 of the Uttlesford Local Plan (adopted 2005).

Odour/noise food businesses.

Prior to development commencing details of any proposed odour extraction systems for food businesses shall be submitted to the local planning authority for written approval. The details provided shall include an odour risk assessment and information on ventilation, odour control and noise control in accordance with the Guidance on the Control of Odour and Noise from commercial Kitchen Exhaust Systems.

REASON: To protect the amenities of the occupiers of adjoining properties in accordance with ULP Policies ENV11, GEN2 and GEN4 of the Uttlesford Local Plan (adopted 2005).

UDC Landscape Officer/Arborist

From: Ben Smeeden <[REDACTED]>
Sent: 14 December 2022 15:06
To: Maria Shoesmith <[REDACTED]>
Subject: Northside UTT/22/0434/OP

The extensive perimeter planting undertaken as part of the landscape masterplan for the first phase of the airport development has successfully matured proving an effective framework which would significantly ameliorate the visual impact the proposed development on the wider landscape.

The Landscape Visual Impact Assessment (LVIA) submitted by the applicant has been undertaken in accordance with the relevant guidance. It has been identified that there would be significant effects of the development, but these would be limited to localised visual receptors from Burton End, from the public rights of way around Birchanger and between Burton End and Tye Green, and from Bury Lodge.

The illustrative landscaping proposals include strengthening of screen planting to reduce the visual impact of the development on the setting of Bury Lodge listed buildings.

The visual impact of the proposed units on the wider landscape can be ameliorated by the application of an appropriate palette of colours and finishes to claddings, which would be dealt with at the reserved matters stage if this current application is approved.

The submission includes a proposed height parameters plan showing the maximum building heights within identified zones in order to reduce the visual impact on the surrounding landscape and Bury Lodge.

The proposed widening of Round Coppice Road will impact on its character. The intended erection of a solid 2m high fence to protect the adjacent ancient woodland, Stocking Wood, from traffic pollution would significantly diminish the appreciation of the

woodland from the road. The protection from traffic fumes afforded to the woodland flora by the fencing would be likely beneficial, but limited. Whilst the appearance of the fencing could be softened with planting, on balance, the introduction of such fencing would be visually detrimental.

The illustrative layout shows a number of existing trees to be removed. The total number of trees shown to be removed is 44 individual and 23 groups of trees. 4 veteran oak trees are shown to be retained. Hedgerows within the main body of the site are shown to be removed. The trees and hedges proposed to be removed would not have a significant impact on the wider landscape.

The illustrative landscaping plan shows some hundreds of individual trees to be planted across the site, and additionally a relatively small area of new native species woodland is proposed to strengthen the existing perimeter woodland on the northern boundary. New hedge planting is also shown to be provided. The indicated tree and hedgerow planting would compensate for the trees and hedges removed to accommodate the development.

Ben Smeeden
Landscape Officer.

ECC Place Services (Conservation and Heritage)

Place Services
Essex County Council
County Hall, Chelmsford
Essex, CM1 1QH
T: 0333 013 6840
www.placeservices.co.uk



FAO:
Planning Department,
Uttlesford District Council

Ref: UTT/22/0434/OP
Date: 21/03/2022

HISTORIC BUILDINGS AND CONSERVATION ADVICE

Dear Sir / Madam,

RE: Land to the north of Stansted, CM24 1SG.

Built Heritage Advice pertaining to an outline application for demolition of existing structures and redevelopment of 61.86Ha to provide 195,100sqm commercial/employment development predominantly within Class B8 and Classes E (G), B2 and supporting food retail/food/beverage/nursery uses within Classes E (A), E (B) and E (F) and associated access/highway works, substation, strategic landscaping and cycle route with matters of layout, scale, appearance and other landscaping reserved.

The application site is within the boundary of Stansted Airport, it is 61.86 hectares in extent and is largely flat. The airport abuts the southern, eastern, and western boundary of the site, the western boundary is formed by Bury Lodge Lane and encompasses the Grade II listed building, Bury Lodge Hotel (list entry number: 1238549). Also, adjacent to Bury Lodge Hotel is the Grade II listed building, *Barns to east of Bury Lodge Hotel* (list entry number: 1238489). To north of the site is open land leading to the settlement of Burton End. The Designated Heritage Assets within Burton End and as identified within the Heritage Statement for consideration are:

- The Ash Inn, Grade II listed (list entry number: 1274126),
- Avondale Cottage and Burton Cottage, Grade II listed (list entry number: 1238486),
- North View and The Cottage, Grade II listed (list entry number: 1238487),
- The Thatch, Grade II listed (list entry number: 1238485),
- Rennisons, The Haven and Vernons, Grade II listed (list entry number: 1221423),
- Evergreen and Fieldside, Grade II listed (list entry number: 1221424),
- Fourwinds, Grade II listed (list entry number: 1221425),
- Warmans, Grade II listed (list entry number: 1238479),
- Southview and The Nook, Grade II listed (list entry number: 1238480),
- Ryders, Grade II listed (list entry number: 1238482),
- Ryders Farmhouse, Grade II listed (list entry number: 1238483), and
- Rands, Grade II listed (list entry number: 1238484).



It is considered that, in line with Historic England's *The Setting of Heritage Assets* (GPA Note 3), the proposals would result in several adverse impacts to the settings of several designated heritage assets. Whilst the existing site of Stansted Airport is not considered to make a positive contribution to the setting of the heritage assets, the existing utilitarian nature and low heights of the present buildings and the large open spaces have a neutral effect within the settings of many of the heritage assets. As established by the 'Proposed Height Parameters Plan', the proposed development would result in the erection of buildings of substantial scale and massing, in particular Zone 1 to the north, visually impacting the wider setting of several designated heritage assets.

Regarding the statutory listed buildings of The Ash Inn, Warmans and Southview & The Nook, the proposed development would visually be intrusive as evident within Viewpoint 4. Given the separation between the heritage assets and the site, I consider this resultant harm to be less than substantial and at the low end of the scale. The proposed development, through its scale and massing, would detract from the wider rural setting and character of the heritage assets. Whilst it is understood that this is an Outline Application with details of scale and appearance reserved, heights should be minimised where possible and robust mitigation measures employed within any details following application.

To the north of the site is a cluster of designated heritage assets, this being North View & The Cottage, Avondale Cottage & Burton Cottage, The Thatch, Rennisons, The Haven & Vernons, Evergreen & Fieldside and Fourwinds. The existing site is not considered to positively contribute to the significance of the above heritage assets however the proposed development and its visual impact would fundamentally detract from the wider setting and rural character of the heritage assets, Zone One containing the tallest buildings, as evident from Viewpoint 2 and 3. The proposed development is therefore considered to result in less than substantial harm to the setting of these heritage assets, this harm being at the low end of the scale.

The statutory listed buildings of Bury Lodge Hotel and Barns to east of Bury Lodge Hotel are immediately adjacent to the site and are those most sensitive to change within their setting. The setting of the heritage assets has already been much eroded, the rural context of the listed buildings being adversely impacted by existing development, the wider setting and the rural character of the heritage assets has been much reduced to its more immediate environs. The proposals will result in additional harm to the setting of the designated heritage assets, the visual impact and enveloping nature of the proposed development would detract from their setting and the rural character of the site. This harm is held to be less than substantial and at the middle of the spectrum.

I do not consider there to be any harm to the significance of Ryders, Ryders Farmhouse and Rands.

The proposals are considered to result in less than substantial harm to several designated heritage assets, Paragraph 202 of the NPPF (2021) being relevant and contrary to Section 66(1) of the Planning (Listed Buildings and Conservation Areas) Act 1990. This harm should be weighed against the public benefits of the proposal. The identification and the level of harm is in accordance with the applicant's heritage assessment.

Yours sincerely,

Thomas Muston BA (Hons) MSc
Historic Environment Team
Place Services

ECC Place Services (Ecology)



25th August 2022

Maria Shoesmith
Uttlesford District Council
London Road
Saffron Walden
CB11 4ER

By email only

Thank you for requesting advice on this outline application from Place Services' ecological advice service. This service provides advice to planning officers to inform Uttlesford District Council planning decisions with regard to potential ecological impacts from development. Any additional information, queries or comments on this advice that the applicant or other interested parties may have, must be directed to the Planning Officer who will seek further advice from us where appropriate and necessary.

Application: UTT/22/0434/OP

Location: Land North of Stansted Airport

Proposal: Outline application for demolition of existing structures and redevelopment of 61.86Ha to provide 195,100sqm commercial / employment development predominantly within Class B8 with Classes E(g), B2 and supporting foodretail/ food/beverage/nursery uses within Classes E (a), E(b) and E(f) and associated access/highway works, substation, strategic landscaping and cycle route with matters of layout, scale, appearance and other landscaping reserved

Dear Maria,

Thank you for re-consulting Place Services on the above application.

No objection subject to securing biodiversity mitigation and enhancement measures

Summary

We have reviewed the documents supplied by the applicant including the Ecology Response Report (RSK Biocensus, dated 17 June 2022), Bat Survey Report (RSK Biocensus, June 2022) and Draft Biodiversity Impact Statement (RSK Biocensus, June 2022) which were submitted in relation to our previous comments, dated 25th May 2022. The submitted documents relate to the likely impacts of development on designated sites, protected species and Priority species & habitats and identification of appropriate mitigation measures.

We are now satisfied that there is sufficient ecological information available for determination of this application.



This provides certainty for the LPA of the likely impacts on designated sites, protected and Priority species & habitats and, with appropriate mitigation measures secured, the development can be made acceptable.

The mitigation measures identified in the Chapter 11: Ecology and Biodiversity of the Environmental Statement: Volume 1, subsequent Volume 2 Annexes (RSK) and Bat Survey Report (RSK Biocensus, June 2022) should be secured by a condition of any consent and implemented in full. This is necessary to conserve and enhance protected and Priority species particularly bats, nesting birds, reptiles and Badger.

It's noted that the proposed works will result in the loss of a bat roost and temporary disturbance to a Badger sett. Licences from Natural England will be required to undertake these works. A copy of the mitigation licence, or method statement for a registered site under a bat Class licence will need to be submitted to the LPA prior to commencement.

A Construction and Environmental Management Plan for Biodiversity (CEMP: Biodiversity) should be produced to outline how ecological receptors including retained habitats and Priority habitats as well as bats, nesting birds, reptiles and Badger will be protected during the construction period. Given the site lies within an Amber Risk Zone for the Great Crested Newt (GCN) District Level Licensing ([GCN Risk Zones \(Essex\) | Natural England Open Data Geoportal \(arcgis.com\)](#)) and suitable habitats are present in close proximity to the site, it is considered possible that GCN will be present. However, given the absence of GCN within ponds on site, through eDNA surveys it may be possible to manage potential impacts upon GCN using a precautionary method statement for GCN for the construction stage, including storage of materials. This precautionary method statement should be included within the CEMP: Biodiversity which should be secured by a condition of any consent, concurrent with reserved matters.

In line with the report recommendations, we recommend a Wildlife Sensitive Lighting Strategy should be delivered for this scheme to avoid impacts to foraging and commuting bats, especially around the retained and newly created woodland and hedgerows (particularly to the north and west of site). This lighting scheme should be secured by a condition of any consent, concurrent with reserved matters. This must follow the [Guidance Note 8 Bats and artificial lighting](#) (The Institute of Lighting Professionals & Bat Conservation Trust, 2018). In summary, it is highlighted that the following measures should be implemented for the lighting design, which could be informed by a professional ecologist:

- Light levels should be as low as possible as required to fulfil the lighting need.
- Warm-White lights should be used preferably at 2700k. This is necessary as lighting which emit an ultraviolet component or that have a blue spectral content have a high attraction effect on insects. This may lead in a reduction in prey availability for some light sensitive bat species.
- If light columns are required, they should be as short as possible as light at a low level reduces the likelihood of any ecological impact. However, the use of cowls, hoods, reflector skirts or shields could also be used to prevent horizontal spill.
- Movement sensors and timers could be used to minimise the 'lit time'.

The Draft Biodiversity Impact Statement (RSK Biocensus, June 2022) has shown that there will be a net gain or no net loss in relation to Priority habitats, however, overall there will be a net loss in



Biodiversity Units. A Final Biodiversity Net Gain Design Stage Report should be secured by a condition of any consent, concurrent with reserved matters, to show how a net gain will be achieved either on site or by the use of off-site compensation.

A draft 15 Year Soft Landscape Maintenance and Management Plan (RSK, January 2022) detailing the proposed management of retained and proposed habitats was submitted with this application. The length of time required for on site management of habitats will be determined by the Defra Biodiversity Metric 3.1 (or any successor) and so this may need to be increased. This is required to secure net gains for biodiversity, as outlined under Paragraph 174d and 180d of the National Planning Policy Framework 2021. Chapter 11: Ecology and Biodiversity of the Environmental Statement: Volume 1 also mentions that bird and bat boxes can be incorporated into the proposals although details of how many and where they could be installed has not been provided. A Landscape and Ecological Management Plan (LEMP), to include details such as bird and bat box provision, should be secured by a condition and submitted concurrent with Reserved Matters stage if planning permission is granted.

This will enable LPA to demonstrate its compliance with its statutory duties including its biodiversity duty under s40 NERC Act 2006.

Impacts will be minimised such that the proposal is acceptable, subject to the conditions below based on BS42020:2013.

We recommend that submission for approval and implementation of the details below should be a condition of any planning consent.

Recommended conditions

1. CONCURRENT WITH RESERVED MATTERS ACTION REQUIRED IN ACCORDANCE WITH ECOLOGICAL APPRAISAL RECOMMENDATIONS

"All mitigation and enhancement measures and/or works shall be carried out in accordance with the details contained in the Chapter 11: Ecology and Biodiversity of the Environmental Statement: Volume 1, subsequent Volume 2 Annexes (RSK) and Bat Survey Report (RSK Biocensus, June 2022) as already submitted with the planning application and agreed in principle with the local planning authority prior to determination.

This may include the appointment of an appropriately competent person e.g. an ecological clerk of works (ECoW) to provide on-site ecological expertise during construction. The appointed person shall undertake all activities, and works shall be carried out, in accordance with the approved details."

Reason: To conserve and enhance protected and Priority species and allow the LPA to discharge its duties under the Conservation of Habitats and Species Regulations 2017 (as amended), the Wildlife & Countryside Act 1981 as amended and s40 of the NERC Act 2006 (Priority habitats & species).



2. CONCURRENT WITH RESERVED MATTERS ACTION REQUIRED: SUBMISSION OF A COPY OF THE MITIGATION LICENCE FOR BADGERS

"Disturbance to a Badger sett shall not in in any circumstances commence unless the local planning authority has been provided with either:

- a) a licence issued by Natural England pursuant Badger Protection Act 1992 authorizing the specified activity/development to go ahead; or*
- b) a statement in writing from the Natural England to the effect that it does not consider that the specified activity/development will require a licence."*

Reason: To conserve protected species and allow the LPA to discharge its duties under and Badger Protection Act 1992 and s17 Crime & Disorder Act 1998.

3. CONCURRENT WITH RESERVED MATTERS ACTION REQUIRED: SUBMISSION OF A COPY OF THE EPS LICENCE OR SUBMISSION OF THE METHOD STATEMENT RELATING TO A REGISTERED SITE UNDER A BAT MITIGATION CLASS LICENCE FOR BATS

"Any works which will impact the resting place of bats, shall not in in any circumstances commence unless the local planning authority has been provided with either:

- a) a licence issued by Natural England pursuant to Regulation 55 of The Conservation of Habitats and Species Regulations 2017 (as amended) authorizing the specified activity/development to go ahead; or*
- b) a method statement relating to a registered site supplied by an individual registered to use a Bat Mitigation Class Licence; or*
- c) a statement in writing from the Natural England to the effect that it does not consider that the specified activity/development will require a licence."*

Reason: To conserve protected species and allow the LPA to discharge its duties under the Conservation of Habitats and Species Regulations 2017 (as amended), the Wildlife & Countryside Act 1981 (as amended) and s17 Crime & Disorder Act 1998.



4. CONCURRENT WITH RESERVED MATTERS PRIOR TO COMMENCEMENT: CONSTRUCTION ENVIRONMENTAL MANAGEMENT PLAN FOR BIODIVERSITY

"A construction environmental management plan (CEMP: Biodiversity) shall be submitted to and approved in writing by the local planning authority.

The CEMP (Biodiversity) shall include the following.

- a) Risk assessment of potentially damaging construction activities.*
- b) Identification of "biodiversity protection zones".*
- c) Practical measures (both physical measures and sensitive working practices) to avoid or reduce impacts during construction (may be provided as a set of method statements) to include the protection of retained and Priority habitats as well as bats, Great Crested Newt, nesting birds, reptiles and Badger.*
- d) The location and timing of sensitive works to avoid harm to biodiversity features.*
- e) The times during construction when specialist ecologists need to be present on site to oversee works.*
- f) Responsible persons and lines of communication.*
- g) The role and responsibilities on site of an ecological clerk of works (ECoW) or similarly competent person.*
- h) Use of protective fences, exclusion barriers and warning signs.*
- i) Containment, control and removal of any Invasive non-native species present on site*

The approved CEMP shall be adhered to and implemented throughout the construction period strictly in accordance with the approved details, unless otherwise agreed in writing by the local planning authority"

Reason: To conserve protected and Priority species and allow the LPA to discharge its duties under the Conservation of Habitats and Species Regulations 2017 (as amended), the Wildlife & Countryside Act 1981 (as amended) and s40 of the NERC Act 2006 (Priority habitats & species).



5. CONCURRENT WITH RESERVED MATTERS PRIOR TO COMMENCEMENT: FINAL BIODIVERSITY NET GAIN DESIGN STAGE REPORT

"A Final Biodiversity Net Gain Design Stage Report, in line with Table 2 of CIEEM Biodiversity Net Gain report and audit templates (July 2021), shall be submitted to and approved in writing by the local planning authority which provides a measurable biodiversity net gain, using the DEFRA Biodiversity Metric 3.1 or any successor.

The content of the Biodiversity Net Gain report should include the following:

- *Baseline data collection and assessment of current conditions on site;*
- *A commitment to measures in line with the Mitigation Hierarchy and evidence of how BNG Principles have been applied to maximise benefits to biodiversity;*
- *Provision of the full BNG calculations, with plans for pre and post development and detailed justifications for the choice of habitat types, distinctiveness and condition, connectivity and ecological functionality;*
- *Details of the implementation measures and management of proposals;*
- *Details of any off-site provision to be secured by a planning obligation;*
- *Details of the monitoring and auditing measures.*

The proposed enhancement measures shall be implemented in accordance with the approved details and shall be retained in that manner thereafter."

Reasons: In order to demonstrate measurable net gains and allow the LPA to discharge its duties under the NPPF (2021)

6. CONCURRENT WITH RESERVED MATTERS, PRIOR TO BENEFICIAL USE: LANDSCAPE AND ECOLOGICAL MANAGEMENT PLAN

"A Landscape and Ecological Management Plan (LEMP) including the provision of bird and bat boxes shall be submitted to, and be approved in writing by, the local planning authority prior to beneficial use of the development.

The content of the LEMP shall include the following:

- a) *Description and evaluation of features to be managed.*
- b) *Ecological trends and constraints on site that might influence management.*
- c) *Aims and objectives of management.*
- d) *Appropriate management options for achieving aims and objectives.*
- e) *Prescriptions for management actions.*
- f) *Preparation of a work schedule (including an annual work plan capable of being rolled forward over a five-year period).*
- g) *Details of the body or organisation responsible for implementation of the plan.*
- h) *Ongoing monitoring and remedial measures.*

The LEMP shall also include details of the legal and funding mechanism(s) by which the long-term implementation of the plan will be secured by the developer with the management body(ies) responsible for its delivery. The plan shall also set out (where the results from monitoring show that conservation aims and objectives of the LEMP are not being met) how contingencies and/or remedial action will be identified, agreed and implemented so that the



development still delivers the fully functioning biodiversity objectives of the originally approved scheme. The approved plan will be implemented in accordance with the approved details."

Reason: To allow the LPA to discharge its duties under the Conservation of Habitats and Species Regulations 2017 (as amended), the Wildlife & Countryside Act 1981 (as amended) and s40 of the NERC Act 2006 (Priority habitats & species)

7. CONCURRENT WITH RESERVED MATTERS PRIOR TO BENEFICIAL USE: WILDLIFE SENSITIVE LIGHTING DESIGN SCHEME

"A lighting design scheme for biodiversity shall be submitted to and approved in writing by the local planning authority. The scheme shall identify those features on site that are particularly sensitive for bats and that are likely to cause disturbance along important routes used for foraging; and show how and where external lighting will be installed (through the provision of appropriate lighting contour plans, Isolux drawings and technical specifications) so that it can be clearly demonstrated that areas to be lit will not disturb or prevent bats using their territory.

All external lighting shall be installed in accordance with the specifications and locations set out in the scheme and maintained thereafter in accordance with the scheme. Under no circumstances should any other external lighting be installed without prior consent from the local planning authority."

Reason: To allow the LPA to discharge its duties under the Conservation of Habitats and Species Regulations 2017 (as amended), the Wildlife & Countryside Act 1981 as amended and s40 of the NERC Act 2006 (Priority habitats & species)

Please contact us with any queries.

Yours sincerely,

Ella Gibbs ACIEEM BSc (Hons)

Senior Ecological Consultant

placeservicesecology@essex.gov.uk

Place Services provide ecological advice on behalf of Uttlesford District Council

Please note: This letter is advisory and should only be considered as the opinion formed by specialist staff in relation to this particular matter.

Crime Prevention Officer

Maria Shoesmith
Planning Services
Uttlesford District Council



Mrs. Heather Gurden
Strategic Designing out Crime Manager
Essex Police HQ
Springfield, Chelmsford
Essex, CM2 6DN

22nd March 2022

Dear Maria Shoesmith

Re: UTT/22/0434/OP- Land North of Stansted Airport

Outline application for demolition of existing structures and redevelopment of 61.86Ha to provide 195,100sqm commercial / employment development predominantly within Class B8 with Classes E(g), B2 and supporting food retail/ food/beverage/nursery uses within Classes E (a), E(b) and E(f) and associated access/highway works, substation, strategic landscaping and cycle route with matters of layout, scale, appearance and other landscaping reserved.

UDC Local Plan Policy GEN2 - Design (d) states" It helps reduce the potential for crime"

We note that this is an outline planning application therefore understand that the finer detail for a full response will not be available at this time, and that through consultation the current content may be subject to some changes in the future as the project evolves. The proposed regeneration is a significant development adjacent to Stansted Airport which has site specific safety and security requirements not only for the airport site but also for those locations that border it. We would welcome early and continued engagement with the developer to mitigate safety and security risks to this development and its neighbours, during construction through to completion and beyond.

Application documents such as the Design and Access Statement, the Design Code document, Lighting Strategy and Demolition Plan provide an abundance of information about the planned development but also produce a number of questions which would be better answered by continued consultation throughout the many phases of this development to ensure that crime is designed out rather resulting in the need to retrofit security measure post development. It is imperative to consider crime as a material consideration, the perception of crime and the fear of crime can be an influential factor in determining the synergy and ongoing sustainability of the wider community. Essex Police would recommend developers consider the foreseeability of crime and maximise on the opportunity to design such issues out, as to prevent the need for bespoke situational crime prevention measures in the future. Essex Police recommend that crime is deemed a material consideration throughout all aspects of the design and provide a 'Crime Risk Assessment' which will identify the potential risks. This will ensure that the scheme design and specification create a healthy, safe, and comfortable environment

We would like to see the 'Fire Strategy' expanded to include the other 'Blue Light' emergency services as these would also be part of any incident both on the airport or on sites immediately adjacent to it. We note that reference is made within the application comment from 'NAT' drawing attention to the need to ensure that the communications with aircraft are not compromised by the

construction works or operation of the industrial site, the same assurance will also be needed by the emergency services operating at the airport with regards to their local communications.

Constructing well designed places, buildings and communities that promote both sustainable communities and health and wellbeing is an objective that the Essex Police Designing out Crime Office widely supports; however, it is imperative that they must also be safe, secure, and accessible.

With such a complex development containing many different potential risk types bordering a significant infrastructure site we would strongly recommend that the Designing out Crime Team, the Airport Policing Command and Road Policing Unit are given the opportunity to partake in any stakeholder consultations. The Roads Policing team who would wish for all provisions by the developer to cover the safety of all road users, and vulnerable road user groups such as cyclists and pedestrians, especially where the focus is now very much moving away from personal vehicles. Consideration is requested by developers to use the "Safe system approach" when designing local Roads. This will take into consideration the various Road user groups who wish to access them. It is essential that emergency vehicles can gain rapid access to any incident occurring within the whole development and surrounding neighbourhoods.

Having a strong working relationship between the developer and Essex Police will mitigate the crime risk to the development, promote a safe and cohesive environment for neighbouring residents, businesses, and infrastructure.

We would welcome the opportunity to consult on this development to assist the developer demonstrate their compliance with this policy and achieve a Secured by Design Commercial award. An SBD award is only achieved by compliance with the requirements of the relevant Design Guide ensuring that risk commensurate security is built into each property and the development as a whole. Such an award provides confidence to tenants, employees, visitors and neighbours that risk commensurate security measures have been incorporated into the design thereby positively impacting on their health and wellbeing.

The Essex Police Designing out Crime Team require further consultation as part of the planning process, and if there are any further queries around embedding designing out crime practices within the project, please do not hesitate to contact designingoutcrime@essex.police.uk.

Yours Sincerely



Heather Gurden AD Cert ED&CP, LCGI, MSyI, CAS
Strategic Designing Out Crime Officer (*SDOCO*)
HQ Local Policing Support Unit
Email: designingoutcrime@Essex.police.uk

Thames Water

Uttlesford District Council
Council Offices
London Road
Saffron Waldon
Essex
CB11 4ER

Our DTS Ref: 54129 Your Ref: UTT/22/0434/OP

22 March 2022

Dear Sir/Madam

**Re: HANGAR 7, NINETH AVENUE, LONDON STANSTED AIRPORT, STANSTED, ESSEX ,
CM24 1SG**

Waste Comments

Thames Water are currently working with the developer of application UTT/22/0434/OP to identify and deliver the off-site FOUL WATER infrastructure needs to serve the development. Thames Water have identified that there is insufficient capacity within the foul water network to serve this development proposal and upgrades to the waste water network are required. Works are ongoing to understand this in more detail and as such Thames Water feel it would be prudent for an appropriately worded planning condition to be attached to any approval to ensure development doesn't outpace the delivery of essential infrastructure. "There shall be no occupation until confirmation has been provided that either:- 1. All foul water network upgrades required to accommodate the additional flows from the development have been completed; or- 2. A development and infrastructure phasing plan has been agreed with Thames Water to allow additional development to be occupied. Where a development and infrastructure phasing plan is agreed, no occupation of those additional dwellings shall take place other than in accordance with the agreed development and infrastructure phasing plan." Reason - Network reinforcement works are likely to be required to accommodate the proposed development. Any reinforcement works identified will be necessary in order to avoid sewage flooding and/or potential pollution incidents. "Should the Local Planning Authority consider the above recommendation inappropriate or are unable to include it in the decision notice, it is important that the Local Planning Authority liaises with Thames Water Development Planning Department (telephone 0203 577 9998) prior to the planning application approval.

Water Comments

With regard to water supply, this comes within the area covered by the Affinity Water Company. For your information the address to write to is - Affinity Water Company The Hub, Tamblin Way, Hatfield, Herts, AL10 9EZ - Tel - 0845 782 3333.

Supplementary Comments

Please can the developer contact our developer services team, the development may need to be transferred to another Sewage Treatment Works.

Yours faithfully

Development Planning Department

Development Planning, Thames Water, Maple Lodge STW, Denham Way, Rickmansworth, WD3 9SQ [Tel:020 3577 9998](tel:02035779998) Email: devcon.team@thameswater.co.uk

East Herts EHO

INTERNAL MEMO

To: Development Control
From: *Claire Spendley*
Tel: 01992 531476
Date: 09/01/2023
Planning Ref: UTT/22/0434/OP
Subject: Land North Of Stansted Airport

Notice is hereby given that the Environmental Health Department:

- a) does not wish to restrict the grant of permission
- b) recommends that permission be refused for reasons set out below.
- c) Y advises that any permission which the Planning Authority may give shall include the conditions below.

Thank you for consulting this Service regarding the above application.

I have reviewed this application from an air quality perspective from an East Herts district level only, and have the following comments to make;

The current proposal results in an adverse impact on the Bishops Stortford AQMA therefore in order to provide appropriate mitigation against these impacts I would recommend the following condition is applied;

Condition

No development shall take place until a scheme of mitigation to address the adverse impacts of air pollution on the Bishops Stortford AQMA is submitted to and approved in writing by the local planning authority. No occupation of the units hereby consented shall take place until such a scheme has been implemented in accordance with the approved details and it shall be retained in accordance with those details thereafter.

Reason

In order to ensure an adequate level of air quality for residents of the new dwellings in accordance with policy EQ4 Air Quality of the adopted East Herts District Plan 2018 and in line with the East Herts Sustainability SPD and IAQM Guidance 2017

ENDS

Kindest regards,

Claire Spendley
Environment Team Manager
Environmental Health

ECC Growth and Development Team

Essex County Council
County Planning
County Hall
Chelmsford
Essex CM1 1QH



Our ref:
Your ref: UTT/22/0434/OP
Date: 29th March 2022

Dear Sir/madam,

RE: Outline application by LandSec Properties – UTT/22/0434/OP Land north of Stansted Airport

Thank you for consulting Essex County Council (ECC) on the above planning application.

ECC is a key infrastructure and service provider and is responsible for delivering and commissioning a wide range of strategic and local infrastructure requirements and public services to support and shape inclusive and healthy communities. ECC's role covers a wide range of statutory services including, but not limited to, highways and transportation, education, early years and childcare, minerals, waste, surface water management, passenger transport, adult social care, and public health. We also advise on, and have a material interest in, a number of other related place-making matters to assist in the determination of planning applications.

The Growth and Development team at ECC is responsible for coordinating single corporate responses for major development schemes and Nationally Significant Infrastructure Projects. We aim to work with Districts and to ensure that the County Council's interests and responsibilities to deliver quality and sufficient infrastructure in the right places and at the right time are effectively communicated, and to support good place-making and place-keeping for existing and future communities.

ECC has reviewed this outline proposal and accompanying documents and sets out here comments and recommendations on the proposed development at this site. Please note that transport comments are provided separately. ECC trusts that the following comments will be considered in the spirit within which they are provided, to assist with and to be taken into account, in the determination of this planning application.

Summary

ECC is a key infrastructure and service provider with statutory responsibilities to ensure that the right infrastructure is delivered in the right place at the right time to support new and existing communities. ECC has carefully considered the information

submitted in support of this planning application. ECC would need to raise concerns about potential impact on local residents, if this development is unable to provide the necessary infrastructure, services and facilities to ensure effective mitigation.

Highways and Transportation

Highways and Transportation comments will be forwarded as soon as possible.

Education and Early Years and Childcare

There is ongoing consideration of the proposed nursery and comments will be forwarded as soon as possible. ECC welcomes the inclusion of childcare facilities to support people working at the site, as well as residents in the area who require access to local childcare.

Economic Growth and Skills

Quantum and mix of units

The Planning Statement and Socio-Economics chapter of the Environmental Statement finds that:

- Only one direct job would be created per 87 sq. m of development
- Average GVA per job would be below the Uttlesford District average, which is already reported as being 21% below the UK average – a gap that is widening
- Only 7 to 9% of the jobs would be created in higher productivity sectors (use classes B2 and E(g)) – notwithstanding evidence presented about wage levels of B8 uses

These documents do not consider levels of out-commuting locally (only self-containment and in-commuting); however, the 2011 census indicates that almost one-third of economically active residents in Uttlesford commuted outside of the district for work.

We urge the Local Planning Authority to place limits on the quantum of B8 uses that could be delivered on site, to improve the contribution of this strategic site to the local economy – and, subsequently, outcomes for Essex residents and businesses.

Uttlesford District is already specialised in construction and retrofit (Location Quotient of the district 1.17 compared to Great Britain) and the site aligns well with occupier needs:

- Construction and retrofit - As the industry shifts towards Modern Methods of Construction (MMC), large factories may be required for off-site assembly. Essex already has three such facilities, but more will be required to meet projected growth. Given the land-hungry nature of MMC factories, they may be

more easily accommodated as part of larger employment areas such as Northside Stansted.

The scale and location of the site mean that it could also support new specialisms. Uttlesford District Council's Economic Development Strategy (2018) identifies life sciences, research and innovation, the rural and visitor economies as key sectors. ECC's interim Sector Development Strategy (2021) identifies five key sectors: advanced manufacturing and engineering, construction and retrofit, clean energy, digital, and life sciences (including MedTech and CareTech).

We note that the site aligns well with existing skills and innovation assets and occupier needs in the following two sectors:

- Advanced manufacturing and engineering - The advanced manufacturing and engineering sector needs a wide variety of sizes and types of business accommodation for component manufacture and assembly operations, but most will benefit from sites with good access to the strategic road network and public transport interchanges and adequate utilities capacity. Around 45% of Uttlesford residents are highly qualified employees (NVQ Level 4+), compared to around 35% across the South East LEP area and 40% across the UK.
- Research facilities will also be needed for the design, testing, and commissioning of new products and smaller-scale production processes. Teaching spaces and conference facilities can be important forums for knowledge-sharing and collaboration with partners. Anglia Ruskin University in Chelmsford provides relevant skills and innovation infrastructure, and clusters of high-tech companies are already established at EOS in Braintree and MODUS in Harlow. Innovation Districts may also emerge within existing employment areas as their uses continue to diversify.
- Life sciences (including MedTech and CareTech) - Businesses that design, test, and commission new products within the field of life sciences typically require controlled environments for different types of laboratories such as wet labs, microbiological / clinical labs, and in vivo labs. They require a highly qualified workforce, and teaching spaces and conference facilities can be important forums for knowledge-sharing and collaboration with partners.
- As well as a large workforce at Chesterford Research Park in Uttlesford, skills and innovation assets relevant to this sector include the Cell & Gene Therapy Catapult Vaccines Manufacturing Centre in Braintree and Arise Innovation Hub in Harlow. The UK Health Security Agency headquarters is also planned to be located in Harlow. Again, Innovation Districts may emerge within existing employment areas as their uses continue to diversify.

The scale and location of the site also offers opportunities to increase innovation and productivity amongst SME's. The minimum size of unit proposed is 2,000 sq. m. We would encourage the delivery of affordable workspace and/or an enterprise centre offering easy-in-easy-out terms to support start-ups. We would also encourage the

delivery of Grow-on Space (150 to 500 sq. m) for businesses that have outgrown their initial accommodation.

We welcome proposals to provide amenities for employees on-site; however, we were unable to identify where, how and when these might be delivered.

Placemaking

According to the current land use plan, some workers will be much further from usable green spaces than others. We welcome the commitment to “creating attractive pedestrian routes around the development to enable occupants to explore and enjoy the landscaped setting and the new community woodland area”; however, we would also encourage more green spaces within the centre of the masterplan area. Seek to ensure that the area facilitates and promotes walking and cycling around the development, rather than the use of the use of the private car.

Similarly, we welcome proposals to provide amenities for employees on-site; however, we were unable to confirm whether these would be easily accessible by pedestrian and cycle-friendly routes.

We welcome the commitment to “an open and permeable frontage to the estate roads which serve the development”, as shown in the artist’s impressions; however, some areas of the masterplan could be revisited to review location of surface car parking in relation to buildings and the carriageway.

We welcome the commitment to creating adaptable spaces by “to construct buildings that can be used by at least two kinds of occupier without significant structural alterations.”

Employment areas should be legible to those who are unfamiliar with the area, through measures such as character areas, landmark buildings, vistas and signage. The Essex Design Quality Review Panel should be used at an early stage in the design process.

Futureproofed broadband connectivity

There is no reference to internet connectivity in the Planning or Design and Access Statements. As per the Essex Design Guide, futureproofed internet access should be provided for all homes and businesses, ideally Fibre to the Premises (FTTP). Plans for such an approach should be submitted for review by Local Planning Authority.

Skills and innovation

The Planning Statement refers to a total figure of 5,000 people employed through development (Economic needs and market commentary refers to 1420 directly supported construction jobs) and operation (sustainability strategy refers to 2010 direct new jobs in operation, as part of 2650 net additional local jobs). These are expected to fall under ‘Transport and storage employment’ and ‘Scientific R&D employment’—any more detail on what this employment is anticipated to look like would be welcome.

The references above to key sectors (Construction, MMC, Advanced Manufacturing and Engineering, Life Sciences, etc) should be considered as part of the approach to maximising future skills and employment benefits. Further consideration should be given to ensuring jobs in these sectors are available to local residents – particularly for construction jobs which are, as noted in the Socio-Economics chapter, likely to be highly mobile.

It is also good to see reference to apprenticeships and opportunities for individuals returning to work as part of wider skills considerations.

We would encourage the delivery of an innovation centre providing business and innovation support (including to facilitate import and export trade) and physical space for collaboration. Consideration should be given to how formal / informal business and academic networks can be nurtured locally.

Further, consideration should be given to Stansted College and whether there may be opportunities to link in with emerging skill needs from Stansted Northside. Stansted College may be able to expand its offer to ensure that courses support local employment needs. ECC are separately aware that Stansted College is potentially looking at investment/expansion and would hope that this could embrace more of the digital skills required for the changing logistics sector, if this development is to be so logistics focussed.

Aviation

In regard to aviation, the site is not proposing aviation related activity and was considered surplus to MAG's needs. However, given the opportunities that the site may provide (e.g., logistics), there may be skills and training linkages that may be facilitated within Stansted College

Phasing and delivery

We welcome the proposal to speculatively deliver smaller units, and the commitment to deliver these to be net zero carbon including embodied energy. However, given the scale of the site, we would encourage consideration of a district-wide energy system.

We did not see any evidence of cross-subsidy between more and less viable uses or viability assessment to identify areas where public sector intervention may be required. For example, we note that the higher productivity uses (use classes B2 and E(g)) are assumed to be delivered towards the end of the development period, presumably by a third party. We would encourage consideration of how this could be delivered in an earlier phase, and whether it would require public sector intervention to achieve this.

We welcome the commitment to "A dedicated team at the estate operates 24 hours, 7 days a week, specifically charged with maintenance, landscaping and security of the estate", but would encourage more detail on how this will be funded in the long term.

Transport and Access

There are concerns the scale of growth proposed may have a significant impact on local and strategic route networks. There is also a need to ensure that active travel is facilitated, as well as improvements to the bus network accessing the site, and also connections to the airport, to ensure that rail can be utilised for commuting rather than the private car.

Further, the cumulative impact of the development on the network needs to be considered. There are other roading within the vicinity of the site that would require attention. There would also be a need to ensure that the bus network links with airport to promote the use of the airport as a multi-modal transport hub, but also ensure that workers have the opportunity for public transport connections, and a frequent shuttle service from the airport to the employment site to facilitate such use. There are also aspirations to improve the cycle network and active travel within the area, so I would hope that this development can link in with that.

Digital Connectivity

In line with the objectives stated in the Government's [Future Telecoms Infrastructure Review](#) 2018, all new developments should include provision of future proofed internet access, ideally Fibre to the Premises. In regard to 5G connectivity, reference should be made to the Essex Design Guides [Planning for 5G guidance](#).

Minerals and Waste Planning

Minerals Matters

Safeguarding Mineral Resources

Policy S8 of the MLP requires that a non-mineral proposal located within an MSA which exceeds defined thresholds must be supported by a Minerals Resource Assessment to establish the existence, or otherwise, of a mineral resource capable of having economic importance. This will ascertain whether there is an opportunity for the prior extraction of that mineral to avoid the sterilisation of the resource, as required by the National Planning Policy Framework (Paragraph 210). The NPPF requires policies that encourage the prior extraction of mineral where it is practical and environmentally feasible.

The MLP can be viewed on the County Council's website via the following link: <https://www.essex.gov.uk/minerals-waste-planning-policy/minerals-local-plan>

The area of land associated with the proposed development does not exceed the 5ha threshold upon which local resource safeguarding provisions are applied for this mineral.

Therefore, a Minerals Resource Assessment (MRA) would **not** be required as part of a planning application on this site.

Mineral Infrastructure Matters

With regard to Mineral Consultation Areas, Policy S8 of the MLP seeks to ensure that existing and allocated mineral sites and infrastructure are protected from inappropriate neighbouring developments that may prejudice their continuing efficient operation or ability to carry out their allocated function in the future. Policy S8 of the MLP defines Mineral Consultation Areas as extending up to 250m from the boundary of an infrastructure site or allocation for the same.

The application site does **not** pass through a Mineral Consultation Area (MCA) and therefore, a Mineral Infrastructure Impact Assessment (MIIA) would **not** be required as part of a planning application on this site.

Mineral Supply Audit

The MWPA requests a Mineral Supply Audit to aid in demonstrating compliance with the notion of sustainable development, circular economy principles and the application of Policy S4 of the adopted Minerals Local Plan 2014 (MLP) which requires, inter-alia, '*The application of procurement policies which promote sustainable design and construction in proposed development*'.

The MLP further notes that '*All developers have the potential to reduce over-ordering of construction materials and encourage more sustainable construction practices through their own procurement practices.*' A Minerals Supply Audit would feed into, or be considered alongside, a Site Waste Management Plan which accords with the MLP principle of 'Encouraging the re-use and recycling of construction, demolition and excavation wastes on-site' (MLP, Para 3.41) to provide a materials balance for major developments.

There is currently no set scope for a Mineral Supply Audit, but the framework in Appendix A has been submitted to the authority previously and could be modified to suit the project in question. Some approaches have included the commitment to sustainable procurement practices as well as demonstrating how recycling and re-use targets will contribute to a reduction in primary aggregate demand.

Waste Matters

Safeguarding Waste Infrastructure

Policy 2 of the WLP seeks to ensure that existing and allocated waste sites and infrastructure are protected from inappropriate neighbouring developments that may prejudice their continuing efficient operation or ability to carry out their allocated function in the future. Policy 2 defines Waste Consultation Areas as extending up to 250m from the boundary of existing or allocated waste infrastructure, unless they are Water Recycling Centres, where the distance increases to 400m.

The WLP can be viewed on the County Council's website via the following link:
<https://www.essex.gov.uk/minerals-waste-planning-policy/waste-local-plan>

The application site does **not** pass through a Waste Consultation Area (WCA) and therefore, a Waste Infrastructure Impact Assessment (WIIA) is not required as part of the planning application.

Site Waste Management Plan

Paragraph 8 of the NPPF recognises the importance of "using natural resources prudently and minimising waste" to ensure the protection and enhancement of the natural environment and to achieve sustainable development. It also reiterates the need to mitigate and adapt to climate change and move towards a low carbon economy. An efficient and effective circular economy is important to achieving these objectives.

Policy S4 of the Minerals Local Plan (2014) advocates reducing the use of mineral resources through reusing and recycling minerals generated as a result of development/ redevelopment. Not only does this reduce the need for mineral extraction, it also reduces the amount sent to landfill. Clause 4 specifically requires: "The maximum possible recovery of minerals from construction, demolition and excavation wastes produced at development or redevelopment sites. This will be promoted by on-site re-use/ recycling, or if not environmentally acceptable to do so, through re-use/ recycling at other nearby aggregate recycling facilities in proximity to the site."

It is vitally important that the best use is made of available resources. This is clearly set out in the NPPF and relevant development plan documents. We would therefore recommend that, in lieu of these issues being addressed prior to a decision, conditions are attached to require the applicant to prepare an appropriately detailed waste management strategy through a Site Waste Management Plan.

A SWMP would be expected to:

- present a site wide approach to address the key issues associated with sustainable management of waste, throughout the stages of site clearance, design, construction and operation,
- establish strategic forecasts in relation to expected waste arisings for construction,
- include waste reduction/recycling/diversion targets, and monitor against these,
- advise on how materials are to be managed efficiently and disposed of legally during the construction phase of development, including their segregation and the identification of available capacity across an appropriate study area.

Energy and Low Carbon

We welcome the proposals for an all-electric space heating and power system for office areas in buildings as well as the reduction of embodied carbon and emissions throughout the construction phase. Further details on the proposed mitigation measures are welcomed in the upcoming energy strategy and details on the

proposed operational and lifetime emissions of the development should also be included. Details on the heating and power proposals for non-office areas should also be included, and the minimisation of GHG emissions from those elements of the development should also be explained.

We would strongly recommend the inclusion of battery storage to accompany the proposed onsite renewable energy generation and would highlight the opportunity to maximise renewable energy generation onsite to exceed the minimum proposed 25% of energy demand. The recently adopted ECAC recommendations included "all new build houses, industrial and commercial units to have solar panels installed immediately", "all new homes and all new commercial buildings granted planning permissions to be carbon zero by 2025 and carbon positive by 2030", and "all waste heat from industrial and commercial use to be captured and reused (where local demands exists) by 2035.". Further details on how the proposals meet these standards should also be included.

Environment and Green Infrastructure

Having reviewed the Design and Access Statement, Biodiversity Validation Check, the Landscape Maintenance and Management Plan and the associated documents which accompanied the planning application, **we do not object** to the granting of UTT/22/0434/OP, however we would advise the following recommendations are considered to improve the GI network and help achieve net environmental gains:

Integration of GI into Building and Amenity Space Design

ECCs GI team recommends further exploration and consideration of GI in the fabric of building design, for instance via wildlife bricks, green roofs and walls, habitat creation invertebrate and dual-purpose street furniture/seating (i.e., a bench including a planter). The design of the street furniture and bin stores can contribute to the landscape character, reduce clutter of an area or street and act as a green corridor/link to the wider landscape scale GI network.

Ancient Woodland

As outlined in the Biodiversity Validation Checklist, the site includes the ancient semi-natural woodland of Stocking Wood, with the ancient woodland of Round Coppice Wood located across the road. Paragraph 180(d) of the National Planning Policy Framework (NPPF) states that "*development resulting in the loss or deterioration of irreplaceable habitats (such as ancient woodland and ancient or veteran trees) should be refused, unless there are wholly exceptional reasons and a suitable compensation strategy exists*". Whilst ECCs GI team recognises that significant development and urban features already surround these sites, it is recommended the appropriate landscape buffers, safeguards and mitigation measures are applied.

Management and Maintenance Plan

ECCs GI team supports the '15 Year Soft Landscape Maintenance and Management Plan' submitted for application UTT/22/0434/OP and would expect yearly logs of the maintenance carried out in accordance with the Maintenance Plan. This information must be available for inspection upon a request by the Local Planning Authority.

This is to ensure that GI is maintained for the lifetime of the development as outlined in any approved Maintenance Plan so that they continue to function as intended to ensure the high-quality and multi-functional benefits of GI assets.

Construction Environmental Management Plan (CEMP)

The submitted '15 Year Soft Landscape Maintenance and Management Plan' does not include the construction period for application UTT/22/0434/OP. No development should take place until there has been submitted to and approved, in writing, by the Local Planning Authority a Construction Environmental Management Plan (CEMP). Ideally, strategic elements of the GI framework are brought forward in phase one of the development, to create a landscape structure or evidence is shown that substantive GI is secured as early as possible in initial phases of delivery to allow early establishment. Therefore, a Construction Environmental Management Plan (CEMP) will be required to set out how retained GI, such as trees, hedges and vegetation, as well as any nature designated sites (e.g., SSSI's etc.) will be protected during construction.

The phased implementation of new GI of the development construction will allow for the GI to mature and it will provide further benefit of reducing/buffering the aesthetic impact from the construction work

Building with Nature – GI Standards

Moving forward, it is recommended that the development proposal applies the Building with Nature standards and achieves an accreditation to highlight what 'good' looks like at each stage of the green infrastructure lifecycle and strengthen the development and demonstrate the development goes beyond the statutory minima, to create places that really deliver for people and wildlife. The Building with Nature Standards has been developed by practitioners and policy makers, academic experts and end-users, and has been tried and tested in multiple schemes from Cornwall to Scotland and is endorsed by Natural England, who is reviewing the current national green infrastructure standards.

For more information, please visit here:

<https://www.buildingwithnature.org.uk/about>.

Conclusion

I hope the above is of assistance – if you require further information on the contents of this single response, please contact [Lois Bowser](#). If a decision is made on the application, any delegated/committee report, decision notice and Section 106 agreement should be sent through to ECC upon publication.

Yours sincerely,

Matthew Thomas
Head of Growth and Development

UDC Planning Policy Team

To	Development Management
From	Joanna Hill, Planning Policy
Date	11 March 2022
Application No	UTT/22/0434/OP
Case Officer	Maria Shoesmith
Proposal	Outline application for demolition of existing structures and redevelopment of 61.86Ha to provide 195,100sqm commercial / employment development predominantly within Class B8 with Classes E(g), B2 and supporting foodretail/ food/beverage/nursery uses within Classes E (a), E(b) and E(f) and associated access/highway works, substation, strategic landscaping and cycle route with matters of layout, scale, appearance and other landscaping reserved.
Location	Land North Of Stansted Airport

Adopted Local Plan 2005

The site is within the area defined as Stansted Airport.

1.10 There are sub regional policies, programmes and strategies for areas that include Uttlesford, such as:

Stansted Airport Employment and Training Strategy

Stansted Airport Sustainable Development Plan 2015, part of which is a surface access strategy.

Where development will take place includes:

2.2.2 A120 corridor.

2.2.5 *Stansted Airport*. The Plan sets out limits on the physical extent of the airport. It is to be seen as an airport in the countryside, a concept that originates from the original airport inquiry 1980-83.

Policy S4- Stansted Airport Boundary

The boundary of Stansted Airport is defined on the Proposals Map. Provision is made for development directly related to or associated with Stansted Airport to be located within the boundaries of the airport. Industrial and commercial development unrelated to the airport will not be permitted on the site.

The site is within the Stansted Airport Boundary

Policy AIR4 - Development in the Northern Ancillary Area

The area of land identified on the Inset Map as the northern ancillary area will be principally reserved for activities directly related to, or associated with, the Airport, such as business aviation facilities, hangarage, aviation fuel storage depots and all those activities listed in Policy AIR3.

This policy was replaced in the withdrawn Regulation 19 Local Plan and evidence suggests should be replaced in the emerging Local Plan to remove the reservation for activities directly related to, or associated with, the Airport

Policy S8 – The Countryside Protection Zone

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. There will be strict control on new development. In particular development will not be permitted if either of the following apply:

A) New buildings or uses would promote coalescence between the airport and existing development in the surrounding countryside;

b) It would adversely affect the open characteristics of the zone.

The proposal is contained within land which has existing airport use. It is not encroaching into the CPZ. The CPZ adjoins the site to the north east.

4.9 Land at Stansted Airport is identified specifically for development directly related to or associated with the airport. Industrial and commercial development unrelated to the airport will not be permitted on site. It is not included within the employment land proposals for the expansion of existing firms and the introduction of new employment because of these restrictions on its use.

National Planning Policy Framework (July 2021)

Para 20. Strategic policies should set out an overall strategy for the pattern, scale and design quality of places, and make sufficient provision¹³ for:

a) housing (including affordable housing), employment, retail, leisure and other commercial development

6. Building a strong, competitive economy

Planning policies and decisions should help create the conditions in which businesses can invest, expand and adapt. Significant weight should be placed on the need to support economic growth and productivity, taking into account both local business needs and wider opportunities for development. The approach taken should allow each area to build on its strengths, counter any weaknesses and address the challenges of the future. This is particularly important where Britain can be a global leader in driving innovation⁴², and in areas with high levels of productivity, which should be able to capitalise on their performance and potential.

82. Planning policies should:

a) set out a clear economic vision and strategy which positively and proactively encourages sustainable economic growth, having regard to Local Industrial Strategies and other local policies for economic development and regeneration;

c) be flexible enough to accommodate needs not anticipated in the plan, allow for new and flexible working practices (such as live-work accommodation), and to enable a rapid response to changes in economic circumstances.

106. Planning policies should:

a) support an appropriate mix of uses across an area, and within larger scale sites, to minimise the number and length of journeys needed for employment, shopping, leisure, education and other activities;

e) provide for any large scale transport facilities that need to be located in the area¹ and the infrastructure and wider development required to support their operation, expansion and contribution to the wider economy. In doing so they should take into account whether such development is likely to be a nationally significant infrastructure project and any relevant national policy statements; and

f) recognise the importance of maintaining a national network of general aviation airfields, and their need to adapt and change over time – taking into account their economic value in serving business, leisure, training and emergency service needs, and the Government's General Aviation Strategy²

Para 123 Local planning authorities should also take a positive approach to applications for alternative uses of land which is currently developed but not allocated for a specific purpose in plans, where this would help to meet identified development needs. In particular, they should support proposals to:

use retail and employment land for homes in areas of high housing demand, provided this would not undermine key economic sectors or sites or the vitality and viability of town centres, and would be compatible with other policies in this Framework

Parish/Town Plan or Design Statement

N/A

¹

⁴⁴ Policies for large scale facilities should, where necessary, be developed through collaboration between strategic policy-making authorities and other relevant bodies. Examples of such facilities include ports, airports, interchanges for rail freight, public transport projects and roadside services. The primary function of roadside services should be to support the safety and welfare of the road user (and most such proposals are unlikely to be nationally significant infrastructure projects).

² Department for Transport (2015) General Aviation Strategy

Withdrawn Local Plan (2019)

The previously withdrawn Regulation 19 draft plan has no weight. Given the evidence informing the emerging Local Plan indicates a similar direction of travel Policy SP11 is noted below in so far as the concept of non-airport related growth on this land is likely to be carried forward into the new plan (full policy appended):

Sustainable growth of London Stansted Airport will be supported in principle, subject to conformity with the environmental and transport framework set out in Policy SP11 – London Stansted Airport.

Policy SP11 makes provision for the airport to respond positively to future growth opportunities and continue to make significant sub regional and national contributions to economic development, jobs and wealth creation while setting a clear environment and transport framework with which to regulate future growth. The North London Stansted Employment Area is included within the Strategic Allocation for a range of Use Class B employment development.

Northern Stansted Employment Area

This 55 hectare site is allocated for B2 and B8 Employment uses.

B1, B2 and B8 employment uses are acceptable in principle at this location but will not be restricted to airport-related employment. Small scale ancillary retail and leisure (as defined in Use Classes A1 to A3 and D2) will be permitted in order to serve the needs primarily, of employees in the area. The Council will require proposals to be subject to a comprehensive development brief or Master Plan which shall set out the proportion and phases of development.

Local Plan Evidence Base

Uttlesford Employment Needs & Economic Development Evidence (Iceni - November 2021)

Employment in and around Stansted airport are extremely important to the economy of Uttlesford

Stansted Airport is the largest employer in Uttlesford District – around 1/3 of employment in Uttlesford is within Stansted airport and its environs. Around three quarters of employment in this area are in Transportation and storage and Accommodation and food service.

Stansted airport and Birchanger are home to 60% of the larger business units in Uttlesford.

Office demand is focused generally on local SME businesses and particularly space of up to 20,000 sq.ft. The market is difficult at the time of writing (July 2021) influenced by Covid-19. It is reported that that outstanding requirements are all for small and medium-sized units, with little demand for larger HQ office space. Rents around Stansted Airport achieve around £19 psf which is below viable for speculative development. The new-build office scheme at Trisail Towers has been on the market for five years, but appears unlikely to come forwards in the short-term given viability challenges.

A lack of **industrial supply** is noted in Uttlesford and more generally within 10 miles of Bishops Stortford with a 98% occupancy level within the industrial market. Demand outstrips supply and there is a need to bring forward new development. Within a 10 mile radius of the Airport, agents report significant requirements. There is demand for industrial space in a range of small, medium and large size bands across the District including from established manufacturing businesses in the District. Additional supply is needed, particularly close to M11 Junction 8, which is the area of strongest occupier demand. Demand exists for smaller rural premises across the district and around the smaller towns and villages.

Employment Land Needs to 2040

1.23 For offices Iceni therefore considers a range of 4.0-6.3 ha is a reasonable provision for the office market based on a labour demand model and taking into account a discount for R&D premises growth.

1.24 For industrial 18.9 ha should be considered as a minimum with 27.2 ha being a pragmatic and recommended level of net growth that facilitates new premises for business over the Plan period. This reflects that the vast majority of premises are essentially full and there is justification to support business growth through new allocations. Iceni's of the view that the development at Northside should

not be considered suitable supply for the general industrial needs established here, given the very large nature of units which, certainly for phase one, are large scale and strategic in nature and not relating to the historic and local development patterns.

1.25 The pattern of future allocations should be considered in full as the Local Plan Spatial Strategy developed. At present our view is that Great Dunmow has the strong local industrial market with a range of local businesses. We consider that the allocation of 5-10 ha or more of employment land would be justified. Saffron Walden is the largest settlement. Given the size of the settlement there is limited existing employment land provision. The allocation of some additional land (c. 2-4 ha) would therefore be warranted through the Local Plan having regard to current provision and to support sustainable development. Historic take-up data shows a strong preference for industrial type business to be located up to 5 miles from Stansted where it can access the M11, population centres at Bishop's Stortford and supply chain and business benefits of Stansted Airport. Further industrial and business space should be considered for allocation in this area, beyond Northside.

Industrial and Logistics Market

5.31 Uttlesford is not however particularly a market for 'big box' logistics space which is more focused towards major motorway corridors such as, within the East of England, the M1 corridor through Hertfordshire and Bedfordshire. There is no evidence of big box take-up in the District over the last decade. However, proposals for 200,000 sq.m. of Warehousing space at Northside (adjacent to Stansted Airport) suggests that there is demand for 'big box' space, which is reasonable, given the growth of online retailing, the presence of the airport and proximity to London

5.32 East of England, LSH reports industrial take-up in 2020 which was 30% above the 5 year average at 5.2 million sq.ft. The available supply of units is 2.0 years for the mid-box units, and less than this for larger/ extra-large sizes.

Northside

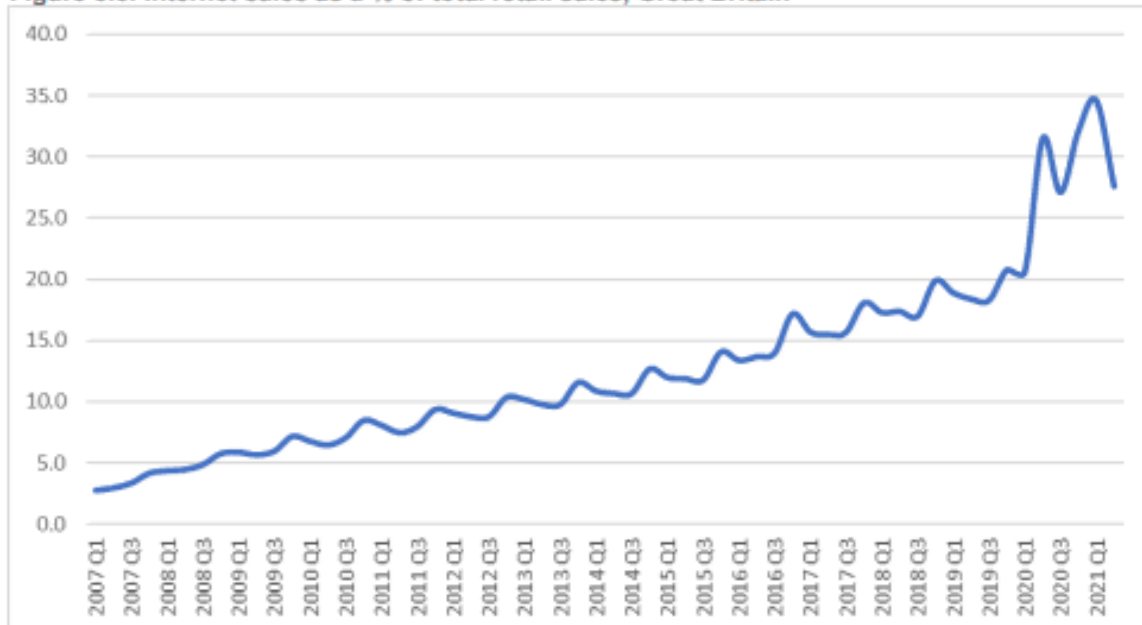
8.25 The airport owners, Manchester Airports Group (MAG), have brought in a development partner – Columbia Threadneedle – to bring forward development of land at Northside, on the northern side of the Airport.

8.26 Around 2.1million sq.ft (200,000 sqm) of principally B8 warehousing development is envisaged, driven by sub-regional/ regional growth in demand for warehousing and logistics space, influenced by structural economic trends including the shift towards e-retailing. It is expected that the early phases of development will be targeted at 'big box' logistics exceeding 100,000 sqft and possibly much larger, although later phases could be smaller units. This reflects the target occupiers as being regional / national occupiers rather than meeting the needs of local businesses.

8.27 Whilst the 2005 Local Plan dictates that this site should be used for Aviation related activities, Stansted Airport's owner-operators don't believe that the site is required for this use and hence it is deemed appropriate that the site is not limited to this use.

8.28 The chart below sets out the shift in retail spending between physical retail space and e-retailing. This structural shift has evidently resulted in a growing take-up of warehousing space which has risen to historical highs, and the expectation is that further growth in internet sales could support further growth.

Figure 8.3: Internet sales as a % of total retail sales, Great Britain



Source: ONS

8.29 IcenI consider that whilst Uttlesford has historically seen minimal growth of 'big box' logistics uses, this reflects a lack of available supply. The locational attributes of this site – its proximity to the M11, ability to draw on labour from a number of surrounding towns, and proximity to London as a major market for goods – mean it would be commercially attractive for these types of activities.

8.30 Oxford Economics, for the scheme promoters, estimate that the scheme will deliver around **2,600 net additional jobs** with associated growth in GVA of £76.6, potentially phased from 2023-30. This suggests employment densities of around 80 sqm per FTE however larger units may be closer to 95 sqm per FTE whilst smaller units could be lower. There are also expected to be temporary construction job benefits of around 1,500 temporary jobs that are likely to involve trades from around the region.

Stansted Airport

12.16 In May 2021, Stansted Airport secured planning consent (through appeal) for expansion to 43 million passengers per year. Additional Direct On-Airport **Additional employment of 3,000 is expected in the Plan period.** Potentially 400-500 additional jobs could be created through indirect and induced employment.

12.17 The airport owners, Manchester Airports Group (MAG), have brought in a development partner – Columbia Threadneedle – to bring forward development of land at **Northside**, on the northern side of the Airport. Around 2.1million sq.ft (200,000 sqm) of principally B8 warehousing development is envisaged. It is expected that the early phases of development will be targeted at 'big box' logistics exceeding 100,000 sqft and possibly much larger. This reflects the target occupiers as being regional / national occupiers rather than meeting the needs of local businesses. Oxford Economics, for the scheme promoters, estimate that the **scheme will deliver around 2,600 net additional jobs.**

Economic Growth outlook

12.18 IcenI has considered baseline forecasts by Cambridge Econometrics which report 61,500 jobs by 2040 from a start of 53,900 in 2019. Based on potential developments at Stansted Airport, Northside and Chesterford Research Park, IcenI is of the view that employment could reach 66,600 by 2040 and that this is a more realistic figure.

Affordable workspace

11.22 The market analysis and business engagement undertaken by Icenl has identified a floorspace affordability issue in the office and employment market in Uttlesford particularly relating to better quality spaces. The workspace market can be difficult for micro-enterprise and SME's to enter. As noted elsewhere, there appears to be a role for the public sector in developing and managing smaller quality units which the market can find it difficult to achieve viably.

11.23 Affordable Workspace can be defined as workspace that has a rental value below the market rate (generally, 80% of the market rate or less). The lower rates mean that occupation tends to be feasible for small or start up enterprises. Therefore, by providing affordable workspace it can help local entrepreneurs and firms to have security and to be protected from rising rents and displacement.

11.24 London authorities and the GLA provide good examples of planning policies that seek to secure affordable workspace. These use Section 106 agreements in order to deliver affordable workspace.

Comments

Development at Northside is of regional importance, reflecting needs beyond the district, due to the importance of Stansted Airport and the delivery of transport services, related services and business, and employment in the East of England.

Northside should **not** be considered suitable supply for the general industrial needs for the rural economy of the Uttlesford District, given the very large nature of units which, certainly for phase one, are large scale and strategic in nature and not relating to the historic and local development patterns.

The Council is in the process of preparing the Regulation 18 Local Plan. Consideration will be made for Planning policies that can widen the benefits of employment growth to surrounding communities. The Employment Needs Report (Icenl 2021):

11.10 Planning policy can be applied to new developments where there are opportunities to provide apprenticeships or training thus raising skills and attainment and supporting people into higher paid employment, potentially connecting employers and employment opportunities to local schools, colleges, training organisations and voluntary services. It seems reasonable to include such policies as a matter of course to encourage local skills and employment development and should generate little burden on the developer / contractor.

11.11 There are a number of authorities in London and the South East that have effectively adopted example policies. Lambeth, Reading and Barnet have set out a policy requirement (as part of Section 106 planning obligation) to access employment opportunities created by the development. This includes creating apprenticeships, using local labour supply and providing training for young people – and where initiatives could not be met in developments, a financial contribution would be considered.

Uttlesford District Council will be considering a requirement for S106 planning obligations to develop a site-specific Employment and Skills Plan (ESP). These are likely to cover the following outcomes:

- Number of apprenticeships,
- Employment and training initiatives,
- Training and work experience for younger people, including those who are not in employment, training or education,
- Best endeavours to maximise local labour;
- Local procurement agreement - potential for local businesses to be included in tender list.

Given the importance of Stansted Airport College in the delivery of training and apprenticeships related to the businesses in and around the airport, they would be an important consultee for Northside and any ESP.

The market analysis and business engagement undertaken by IcenI has identified a floorspace affordability issue in the office and employment market in Uttlesford particularly relating to better quality spaces. The workspace market can be difficult for micro-enterprise and SME's to enter. The new Local Plan would be looking to include Policy to increase the provision of affordable. This may include for example:

10% of affordable workspace must be included for employment developments over 1,000 sqm, leased to the council for a peppercorn rent for 20 years and managed by a council approved Workspace Provider. Rental values for end occupiers will ultimately depend on the quality of space and its location. All proposals which provide affordable workspace must prepare an Affordable Workspace Statement.

If not on-site then equivalent re-provision in an alternative area could be considered.

The site is of regional importance but there is environmental impact on Uttlesford and we would seek to secure benefits for Uttlesford, through an Employment and Skills Plan and contribution to provision of affordable workspace.

The site has excellent access to the road and rail network, the transport and environmental impacts will need to be identified and addressed, including assessment of carbon emissions and climate change sustainability. The recent Strategic Land Availability Assessment Technical Consultation has revealed that there is not access to the airport for active travel (on foot and cycle) which is a consideration. In the future, there may be a Rapid Transit System in the south of the district, linking neighbouring districts, however this is yet to be determined.

Northside will be an important employment generator, and consideration needs to be given to staff movements to and from the site. It is particularly important to use this as an opportunity to enhance the existing public transport network at the airport and not to compete with it. One reason for this is that the existing bus network has been established to a degree by S106 funding from airport expansion.

It is understood via the Stansted Airport Transport Forum that all employees would be offered use of the Airport Staff Travelcard, which gives discounts on fares on the airport's public transport network.

Conclusion

The policy restricting the site to aviation related uses is out of date, and more recent evidence indicates it is no longer needed to be restricted to these uses. Furthermore, the evidence informing the emerging Local Plan indicates this site's locational attributes – its proximity to the M11, ability to draw on labour from a number of surrounding towns, and proximity to London as a major market for goods – mean it would be commercially attractive for 'big box' logistics as well as other uses.

Any employment provision on site would reflect a wider regional need than that of the rural district of Uttlesford.

Consideration should be made in S106 agreements to contribute to

- A site-specific Employment and Skills Plan
- Provision of affordable workspace

To conform to Uttlesford Climate Crisis Strategy, other requirements include:

- Sustainable construction methodology and plan
- Submission of a climate change sustainability statement that will be required in the new plan for major developments that highlights issues around carbon emissions and mitigation.

Withdrawn Regulation 19 Local Plan:

1. They are directly related to airport use of development, apart from within the North Stansted Employment Area ;
2. They contribute to achieving the latest national aviation policies;
3. They are in accordance with the latest permission;
4. Do not result in a significant increase in Air Transport Movements or air passenger numbers that would adversely effect the amenities of surrounding occupiers, or the local environment or transport networks (in terms of, noise, disturbance, air quality and climate change impacts);
5. Achieve further noise reduction or no increase in day or night time noise in accordance with the airport's most recent Airport Noise Action Plan (approved by the Secretary of State on a five yearly basis);
6. Include an effective noise control, monitoring and management scheme that ensures that current and future operations at the airport are fully in accordance with the policies of this Plan and any planning permission that has been granted;
7. Include proposals which will over time result in a proportionate diminution and betterment of the effects of aircraft operations on the amenity of local residents and occupiers and users of sensitive premises in the area, such as through measures to be taken to encourage fleet modernisation or otherwise;
8. Incorporate sustainable transportation and surface access measures in particular which minimise use of the private car, and maximise the availability and use of sustainable transport modes and seek to meet modal shift targets, all in accordance with the London Stansted Sustainable Development Plan;
9. Incorporate suitable road access for vehicles including any necessary improvements required as a result of the development and demonstrate that the proposals do not adversely affect the adjoining highway network; and will not lead to detriment to the amenity of the area and neighbouring occupiers;
10. Be consistent the latest Sustainable Development Plan for the Airport.

Northern Stansted Employment Area

This 55 hectare site is allocated for B2 and B8 Employment uses.

Policy SP 11

London Stansted Airport

Sustainable growth of London Stansted Airport will be supported in principle and is designated as a Strategic Allocation in the Local Plan. The Strategic Allocation (see Policies Map) includes land within the existing airport operational area and incorporates the North Stansted Employment Area. The wider strategic allocation serves the strategic role of London Stansted Airport and associated growth of business, industry and education, including aviation engineering, distribution and service sectors and the airport college which are important for Uttlesford, the sub-regional and national economy.

Airport Safeguarding

Development that would adversely affect the operational integrity or safety of London Stansted Airport will not be permitted. With respect to operational and national security considerations, this includes (but is not limited to) concerns over the height of buildings, lighting, bird activity and proximity to Public Safety Zones. The 1:10,000 and the 1:100,000 risk contours are shown on the Policies Map. Within the 1:10,000 risk contour no residential or employment uses will be permitted. Within the 1:100,000 risk contour permission will only be granted for extensions or changes of use or low density development.

Access to London Stansted Airport

London Stansted Airport's role as a national, regional and local transport interchange will be maintained. The necessary local and strategic transport infrastructure and rail, coach, bus service, pedestrian and cycle capacity to accommodate the passenger and employee trips and other journeys via connections at the airport must be maintained and enhanced. An integrated approach must be demonstrated within the framework of a surface access strategy.

To assist development of new rapid transit options between the airport and new and existing communities, land will be safeguarded to allow access at the terminal. The council will seek financial contributions from the airport operator for the delivery of an appropriate scheme.

Airport Development

Proposals for the development of the airport and its operation, together with any associated surface access improvements, will be assessed against the Local Plan policies as a whole. Proposals for development will only be supported where all of the following criteria are met:

B1, B2 and B8 employment uses are acceptable in principle at this location but will not be restricted to airport-related employment. Small scale ancillary retail and leisure (as defined in Use Classes A1 to A3 and D2) will be permitted in order to serve the needs primarily, of employees in the area. The Council will require proposals to be subject to a comprehensive development brief or Master Plan which shall set out the proportion and phases of development.

Airport-related Car Parking

Proposals for airport related car parking should be located within the Airport Strategic Allocation, as shown on the Policies Map (excluding North Stansted Employment Area). Appropriate mechanisms will be sought to make sure that all on airport car parking is integrated into and contributes to funding of the airport surface access strategy. Proposals for airport related car parking outside this area will only be permitted where all of the following criteria are met:

9. There is demonstrated to be a long-term car parking need that cannot be met within the Airport Strategic Allocation;
10. They relate well to the strategic road network and do not exacerbate traffic congestion;
11. They do not have an adverse impact on amenity; and
12. They are in accordance with the most recent Sustainable Development Plan for London Stansted.

London Stansted Airport Strategic Allocation

Development proposals at the London Stansted Airport Strategic Allocation will ensure:

13. Appropriate strategic landscaping will be provided both on and off site, which shall have regard to the potential for significant visual prominence within the wider area of built development and which does not increase risk to aviation operations arising from structures, lighting, bird strike or open water and having regard to operational and national security considerations; and
14. The height and design of buildings will reflect the site's countryside setting, its visibility from surrounding countryside; and
15. Provision is made for sustainable drainage and the disposal of surface water in order to prevent any harm occurring to neighbouring land.

Strategic Landscape Areas

Development will not be permitted within those areas identified as strategic landscape areas on the Policies Map Inset.

ECC Specialist Archaeological Advice

Place Services
Essex County Council
County Hall, Chelmsford
Essex, CM1 1QH
T: 0333 013 6840
www.placeservices.co.uk



Nigel Brown
Planning and Development Control Manager
Uttlesford District Council
Council Offices
London Road
Saffron Walden
CB11 4ER

Date: 14th March 2022

Specialist Archaeological Advice

Dear Nigel

UTT/22/0434/OP Land North of Stansted Airport

The Historic Environment Advisor of Essex County Council has identified the above application from the weekly list.

The following recommendations are in line with the new National Planning Policy Framework paragraph 205.

RECOMMENDATION: 1 An Archaeological Programme of Trial Trenching followed by Open Area Excavation

1. No development or preliminary groundworks of any kind shall take place until a programme of archaeological investigation has been secured in accordance with a written scheme of investigation which has been submitted by the applicant, and approved in writing by the local planning authority.
2. No development or preliminary groundworks of any kind shall take place until the completion of the programme of archaeological evaluation identified in the WSI defined in Part 1 and confirmed by the Local Authority archaeological advisors.
3. A mitigation strategy detailing the excavation / preservation strategy shall be submitted to the local planning authority following the completion of the archaeological evaluation.



4. No development or preliminary groundworks can commence on those areas containing archaeological deposits until the satisfactory completion of fieldwork, as detailed in the mitigation strategy, and which has been approved in writing by the local planning authority.
5. The applicant will submit to the local planning authority a post excavation assessment (to be submitted within six months of the completion of the fieldwork, unless otherwise agreed in advance with the Planning Authority). This will result in the completion of post excavation analysis, preparation of a full site archive and report ready for deposition at the local museum, and submission of a publication report.

Recommendation 2 Building Recording

1. No demolition, conversion or alterations shall commence until a programme of historic building recording has been secured in accordance with a written scheme of investigation (WSI) to be submitted by the applicant and approved in writing by the local planning authority.
2. No demolition, conversion or alterations shall take place until the satisfactory completion of the recording in accordance with the WSI submitted.
3. The applicant will submit to the local planning authority a report detailing the results of the recording programme and confirm the deposition of the archive to an appropriate depository as identified and agreed in the WSI .

Reason for Archaeological recommendation

An assessment of the archaeological impact is provided as Chapter 12 within the Environmental Statement has been submitted with the proposed application.

The Essex Historic Environment Record shows the proposed development area has the potential to contain significant archaeological remains. A number of phases of archaeological investigations have occurred at Stansted Airport as it developed as London's third international airport. In 1986-1991 the Essex County Council field Unit undertook a major fieldwalking programme identifying a wide range of archaeological sites dating from the late Bronze Age through to the post medieval period. This was followed by expansion in the late 1990's and early 2000 undertaken by Framework Archaeology, and then again major evaluation work was undertaken by Framework Archaeology in advance of Stansted G2.

The submitted Environmental Statement suffers from assessing only a limited area and many of the major discoveries at Stansted have not been identified. The submitted ES

has omitted all of the extensive excavations to the east of the present runway which is disappointing as this would have provided a better understanding of the extent of the likely archaeological deposits. Under 12.47 of the ES it states that the archaeological remains would have been impacted by the World War II construction, however, a number of the archaeological sites already excavated have shown a high level of preservation beneath elements of the WWII airfield.

This office would largely agree with the Receptors and Receptor sensitivity identified in 12.48, however, considering the extent of Roman burials and other occupation in the adjacent long term car parks we would recommend that the Roman remains are also identified as of high potential.

Within the mitigation section (12.60-12.66) this office would support the proposal for evaluation trenches on all areas of development, to include those within the present built up area, and the 2 high voltage under ground cables and the new buildings on the present fields to the north, followed by open area excavation, with a programme of building recording on those structures which warrant recording prior to demolition. We would not recommend a programme of watching brief on any part of the development as this should be avoided through appropriate evaluation, or strip map and assess programmes.

The Written Scheme of Investigation for archaeological trial trenching on one plot of land has been agreed, however, the remaining areas of the site will all need a similar programme to be agreed.

All archaeological work should be conducted by a professional recognised archaeological contractor in accordance with a brief issued by this office or signed off by this office.

If you have any questions, please do not hesitate to contact me.

Yours sincerely



Richard Havis
Principal Historic Environment Advisor



NOTE: This letter is advisory and should only be considered as the opinion formed by specialists in relation to this particular matter.

Essex Fire and Rescue



Essex County
Fire & Rescue Service

Rick Hylton
Chief Fire Officer / Chief Executive

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

North West Group Delivery Point
Harlow Fire Station
Fourth Avenue
HARLOW
CM20 1DU

Enquiries to: Belinda Moroney Fire Safety Officer
T: +44(0) 1376 576800
northwestgroupdp@essex-fire.gov.uk

Our Ref: 90589
Your Ref: UTT/22/0434/OP
Date: 01 March 2022

Dear Sir/Madam

Re: Town & Country Planning Act 1990

Planning Application N^o: UTT/22/0434/OP

Description: Outline application for demolition of existing structures and redevelopment of 61.86Ha to provide 195,100sqm commercial / employment development predominantly within Class B8 with Classes E(g), B2 and supporting foodretail/ food/beverage/nursery uses within Classes E (a), E(b) and E(f) and associated access/highway works.

Location: Land North of Stansted Airport

Thank you for your letter dated 28/02/2022 in which you directed this Authority to your website.

The application has been considered and I draw your attention to the following comments:

Access

Access for Fire Service purposes has been considered in accordance with the Essex Act 1987 - Section 13 and is acceptable provided that the arrangements are in accordance with Building Regulations and details contained in Approved Document B volume 2 requirement B5.

More detailed observations on access and facilities for the Fire Service will be considered at Building Regulation consultation stage.

Building Regulations

It is the responsibility of anyone carrying out building work to comply with the relevant requirements of the Building Regulations. Applicants can decide whether to apply to the Local Authority for Building Control or to appoint an Approved Inspector.

Local Authority Building Control will consult with the Essex Police, Fire and Crime Commissioner Fire and Rescue Authority (hereafter called "the Authority") in accordance with "Building Regulations and Fire Safety - Procedural Guidance".

Approved Inspectors will consult with the Authority in accordance with Regulation 12 of the Building (Approved Inspectors etc.) Regulations 2010 (as amended).

Water Supplies

The architect or applicant is reminded that additional water supplies for firefighting may be necessary for this development. The architect or applicant is urged to contact the Water Technical Officer at Service Headquarters, telephone 01376-576344.

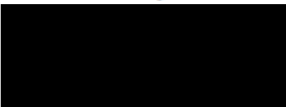
Sprinkler Systems

"There is clear evidence that the installation of Automatic Water Suppression Systems (AWSS) can be effective in the rapid suppression of fires. Essex County Fire & Rescue Service (ECFRS) therefore uses every occasion to urge building owners and developers to consider the installation of AWSS. ECFRS are ideally placed to promote a better understanding of how fire protection measures can reduce the risk to life, business continuity and limit the impact of fire on the environment and to the local economy.

Even where not required under Building Regulations guidance, ECFRS would strongly recommend a risk-based approach to the inclusion of AWSS, which can substantially reduce the risk to life and of property loss. We also encourage developers to use them to allow design freedoms, where it can be demonstrated that there is an equivalent level of safety and that the functional requirements of the Regulations are met."

If you have any further queries, then please contact the above Officer quoting our reference number.

Yours faithfully



Belinda Moroney
Protection

ECC Minerals & Waste Team

From: [Emma Robinson - Planning Technician](#)
To: [Planning](#)
Cc: [Philip Dash - Principal Planning Officer](#)
Subject: [External] FW: Planning Application Consultation - N UTT/22/0434/OP
Date: 22 February 2022 13:44:26
Attachments: [vfm47_CONS - Consultee Letterm.pdf](#)

Dear Planning team

Thank you for your email consulting the Mineral and Waste Planning Authority on the above application. The Mineral Planning Authority has no comment to make in relation to this application as the area of the proposed development site located within the Essex sand and gravel Mineral Safeguarding Area is below the minimum Minerals Local Plan 2014: Policy S8 threshold of 5ha.

Many thanks

Emma

Emma Robinson

Planning Technician

Planning Service

Essex County Council



Cadent Gas

From: plantprotection@cadentgas.com
To: [Planning](#)
Subject: [External] LSBUD Ref: 24731564 Your Ref: UTT/22/0434/OP DBYD MP-LP High Risk
Date: 15 February 2022 11:05:55
Attachments: [24731564_CadentGas.pdf](#)

Date: 15/02/2022
LinesearchbeforeUdig ref: 24731564
Your ref: UTT/22/0434/OP

Dear Sir/Madam,

Your planning application – No objection, informative note required

We have received a notification from the LinesearchbeforeUdig (LSBUD) platform regarding a planning application that has been submitted which is in close proximity to our medium and low pressure assets. We have no objection to this proposal from a planning perspective, however we need you to take the following action.

What you need to do

To prevent damage to our assets or interference with our rights, please add the following **Informative Note** into the **Decision Notice**:

Cadent Gas Ltd own and operate the gas infrastructure within the area of your development. There may be a legal interest (easements and other rights) in the land that restrict activity in proximity to Cadent assets in private land. The applicant must ensure that the proposed works do not infringe on legal rights of access and or restrictive covenants that exist.

If buildings or structures are proposed directly above the apparatus the development may only take place following diversion of the apparatus. The applicant should apply online to have apparatus diverted in advance of any works, by visiting cadentgas.com/diversions

Prior to carrying out works, including the construction of access points, please register on www.linesearchbeforeudig.co.uk to submit details of the planned works for review, ensuring requirements are adhered to.

Your responsibilities and obligations

Cadent may have a Deed of Easement on the pipeline, which provides us with a right of access for a number of functions and prevents change to existing ground levels, storage of materials. It also prevents the erection of permanent/temporary buildings, or structures. If necessary Cadent will take action to legally enforce the terms of the easement.

This letter does not constitute any formal agreement or consent for any proposed development work either generally or related to Cadent's easements or other rights, or any planning or building regulations applications.

Cadent Gas Ltd or their agents, servants or contractors do not accept any liability for any losses arising under or in connection with this information. This limit on liability applies to all and any claims in contract, tort (including negligence), misrepresentation (excluding fraudulent misrepresentation), breach of statutory duty or otherwise. This limit on liability does not exclude or restrict liability where prohibited by the law nor does it supersede the express terms of any related agreements.

If you need any further information or have any questions about the outcome, please contact us at plantprotection@cadentgas.com or on 0800 688 588 quoting your reference at the top of this letter.

Kind Regards,
Plant Protection Team
T: 0800 688 588
plantprotection@cadentgas.com
cadentgas.com

Gigaclear Ltd



Our Ref: 24731564 Your Ref: UTT/22/0434/OP

Tuesday, 15 February 2022

Lynn Rusling
Council Offices London Road
Saffron Walden
Essex
CB11 4ER

Dear Lynn Rusling

Gigaclear Ltd - Asset Network Plans

We acknowledge with thanks your request for information on the location of our assets.

Please find enclosed plan(s) showing the approximate position of our apparatus known to be in the vicinity of this site.

I attach conditions and information regarding our network, including our contact numbers. Please ensure that this detail is made available to anyone carrying out any works which may affect our apparatus.

Should you require further details, please call me at your convenience.

Yours sincerely,

Gigaclear Ltd
01865 591 121
diversions@gigaclear.com

UK Power Network



Registered Office:
Newington House
237 Southwark Bridge Road
London SE1 6NP

Company:
UK Power Networks (Operations)
Limited

Registered in England and Wales No: 3870728

Our Ref: 24731564 Your Ref: UTT/22/0434/OP

Tuesday, 15 February 2022

Lynn Rusling
Council Offices London Road
Saffron Walden
Essex
CB11 4ER

Dear Lynn Rusling

Thank you for contacting us regarding UK Power Networks equipment at the above site. I have enclosed a copy of our records which show the electrical lines and/or electrical plant. I hope you find the information useful.

I have also enclosed a fact sheet which contains important information regarding the use of our plans and working around our equipment. Safety around our equipment is our number one priority so please ensure you have completed all workplace risk assessments before you begin any works.

Should your excavation affect our Extra High Voltage equipment (6.6 KV, 22 KV, 33 KV or 132 KV), please contact us to obtain a copy of the primary route drawings and associated cross sections.

If you have any further queries do not hesitate to contact us.

Plan Provision
0800 056 5866

This information is made available to you on the terms set out below. If you do not accept the terms of use set out in this fact sheet please do not use the plans and return them to UK Power Networks.

1. UK Power Networks does not warrant that the information provided to you is correct. You rely upon it at your own risk.
2. UK Power Networks does not exclude or limit its liability if it causes the death of any person or causes personal injury to a person where such death or personal injury is caused by its negligence.
3. Subject to paragraph 2 UK Power Networks has no liability to you in contract, in tort (including negligence), for breach of statutory duty or otherwise how for any loss, damage, costs, claims, demands, or expenses that you or any third party may suffer or incur as a result of using the information provided whether for physical damage to property or for any economic loss (including without limitation loss of profit, loss of opportunity, loss of savings, loss of goodwill, loss of business, loss of use) or any special or consequential loss or damage whatsoever.
4. The information about UK Power Networks electrical plant and/or electric lines provided to you belongs to and remains the property of UK Power Networks. You must not alter it in any respect.
5. The information provided to you about the electrical plant and/or electric lines depicted on the plans may NOT be a complete record of such apparatus belonging to UK Power Networks. The information provided relates to electric lines and/or electrical plant belonging to UK Power Networks that it believes to be present but the plans are not definitive: other electric lines and/or electrical plant may be present and that may or may not belong to UK Power Networks.
6. Other apparatus not belonging to UK Power Networks is not shown on the plan. It is your responsibility to make your own enquiries elsewhere to discover whether apparatus belonging to others is present. It would be prudent to assume that other apparatus is present.
7. You are responsible for ensuring that the information made available to you is passed to those acting on your behalf and that all such persons are made aware of the contents of this letter.
8. Because the information provided to you may not be accurate, you are recommended to ascertain the presence of UK Power Networks electric lines and/or electrical plant by the digging of trial holes. Trial holes should be dug by hand only.

Excavations must be carried out in line with the Health and Safety Executive guidance document HSG 47. We will not undertake this work. A copy of HSG 47 can be obtained from the Health and Safety Executives website.

All electric lines discovered must be considered LIVE and DANGEROUS at all times and must not be cut, resited, suspended, bent or interfered with unless specially authorised by UK Power Networks.

The electric line and electrical plant belonging to UK Power Networks remains so even when made dead and abandoned and any such electric line and/or electrical plant exposed shall be reported to UK Power Networks.

Where your works are likely to affect our electric lines and/or electrical plant an estimate of the price of any protective /diversionary works can be prepared by UK Power Networks Branch at Metropolitan House, Darkes Lane, Potters Bar, Herts. , EN6 1AG, telephone no. 0845 2340040



- 9 Any work near to any overhead electricity lines must be carried out by you in accordance with the Health and Safety Executive guidance document GS6 and the Electricity at Work Regulations.

The GS6 Recommendations may be purchased from HSE Books or downloaded from the Energy Networks Association's website.

If given a reasonable period of prior notice UK Power Networks will attend on site without charge to advise how and where "goal posts" should be erected. If you wish to use this service, in the first instance please telephone: 0845 6014516 between 08:30 and 17:00 Monday to Friday.

10. You are responsible for the security of the information provided to you. It must not be given, sold or made available upon payment of a fee to a third party.
11. If in carrying out work on land in, on, under or over which is installed an electric line and/or electrical plant that belongs to UK Power Networks you and/or anyone working on your behalf damages (however slightly) that apparatus you must inform immediately UK Power Networks by our emergency 24 hour three digit telephone number **105** providing;
- your name, address and telephone number;
 - the date, time and place at which such damage was caused;
 - a description of the electric line and/or electrical plant to which damage was caused;
 - the name of the person whom it appears to you is responsible for that damage;
 - the nature of the damage.
12. The expression "UK Power Networks" includes UK Power Networks (EPN) plc, UK Power Networks (LPN) plc, UK Power Networks (SEPN) plc, UK Power Networks and any of their successors and predecessors in title.



