

Inquiries and Major Casework Team
The Planning Inspectorate
3rd Floor
Temple Quay House
2 The Square
Temple Quay
Bristol
BS1 6PN

Your Ref: S62A/2023/0022
Date: 8 September 2023

Sent by email: section62a@planninginspectorate.gov.uk

Dear Major Casework Team,

RE: S62A/2023/0022 - London Stansted Airport, Bassingbourn Road, Stansted CM24 1QW

Thank you for consulting Essex County Council (ECC) and providing the opportunity to respond to the planning application (Ref S62A/2023/0022) at London Stansted Airport.

By way of context, ECC engages with Manchester Airport Group (MAG) the current owners of London Stansted Airport on an initiative-taking, productive, professional ongoing basis. This engagement is through a series of statutory and non-statutory meetings at a combination of member and officer levels. The engagement has assisted in ensuring that ECC are able to discuss matters with MAG to develop resolutions and understand how our roles can benefit and mitigate any matters of concerns for both the local and wider Essex community who, live nearby and work in and around the airport.

ECC understands the inter-relationship between this current planning application and a previous application which sought to make best use of the runway capacity (Reference UTT/18/0460/FUL). This earlier application included airfield works comprising two new taxiway links to the existing runway (a Rapid Access Taxiway and a Rapid Exit Taxiway), six additional remote aircraft stands (adjacent Yankee taxiway); and three additional aircraft stands (extension of the Echo Apron) to enable combined airfield operations of 274,000 aircraft movements and a throughput of 43 million terminal passengers (currently 35 mppa), in a 12-month calendar period. This application was supported by evidence that demonstrated how the airport and surrounding infrastructure may be able to deliver on that required for the increased passenger and staff throughput.

ECC appreciates this current application (Ref S62A/2023/0022) is for a proposed 3-bay deep extension of the existing terminal, which would facilitate the expansion of the check-in area, departures lounge, and an internal reorganisation of baggage reclaim facilities, immigration, customs, associated retail and arrivals hall and forecourt. The application also seeks permission for the decommissioning of the existing passenger Track Transit System (TTS) which is to be replaced by the construction of three 'Skylinks' to the three existing aircraft piers: a baggage handling building, plant enclosure and associated hardstanding.

It is understood that the planning application would facilitate the terminal transformation which is designed to provide additional terminal capacity and an improved passenger experience. It is recognised that the plans would enable the development of a larger departure lounge with a wide variety of shops, bars and restaurants, expanded immigration hall and additional baggage reclaim belts. The scheme will also allow for an extension to the security hall to incorporate the latest check-in technology.

ECC is of the view that the plans for the terminal transformation highlight MAG's continued commitment and ambition to invest in London Stansted, delivering new facilities ensuring passenger experience is of a quality expected by all passengers, and an improved working environment for staff. The current planning application is considered to facilitate MAG unlocking the economic contribution envisaged by the previous planning application (UTT 18/0460), assisting the delivery of a planned additional 5,000 jobs, and a doubling of the Gross Value Added (GVA) to £2 billion per annum.

ECC's role is one of statutory consultee. We are a key infrastructure and service provider 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 across the county of Essex. ECC's role covers a wide range of statutory and regulatory services including (but not limited to) -

- the Highways and Transportation Authority;
- the Minerals and Waste Planning Authority;
- the Lead Local Flood Authority;
- the Public Health Authority;
- the Education Authority;
- key economy partner and service provider within Essex, promoting economic development, regeneration, employability and skills, infrastructure delivery for the benefit of Essex and the region.

ECC advise on, and has a material interest in, several other related place-making matters to assist in the determination of planning applications.

The ECC Planning Service is responsible for coordinating and providing the Council's corporate response to major development applications including, commercial, Garden Communities and Nationally Significant Infrastructure Projects. This approach ensures ECC's interests and responsibilities to inform, shape and deliver quality, and provide for the necessary and required infrastructure in the right places and at the right time, are effectively communicated, thereby supporting good place-making and place-keeping for both existing and future communities.

In summary ECC has reviewed the submitted information and is supportive of the terminal expansion as it is recognised that this is complimentary to delivering the passenger growth permitted through the previous application (UTT/018/0460). The ECC support

provided is conditional on mitigation measures identified in ECC's response to the current planning application, which must be accounted for and addressed through planning conditions and an appropriately worded Section 106 legal agreement. More detail is set out in the attached appendix.

ECC appreciate the significant role London Stansted Airport plays in contributing to the national and Essex economy, including attracting foreign and domestic investment, generating direct and indirect employment and supply chain opportunities. ECC acknowledges that the growth already planned at the airport from the UTT/18/0460 application, must be supported by a quality passenger experience. It is also understood that a quality passenger experience will assist MAG in maintaining existing airline services and help attract/expand the airline and route network offered at the airport. In order to attract long haul airlines, the quality and nature of the passenger experience is a matter importance to airlines. ECC is eager to ensure that growth at Stansted provides benefits to those communities living, working, and investing within Essex and widely economy. ECC aims to support MAG in seeking to attract a diverse choice of airlines, routes and increasingly the long-haul offer, provided at the airport. In seeking to do this it is appreciated that the current capacity in the terminal is not adequate, and this terminal transformation is essential.

ECC welcomes ongoing discussions with MAG and relevant partners in relation to matters and issues raised in our response, and to ensure the effective and efficient operation at the airport for the existing and future Essex community.

If you require further information on the contents of this corporate response, please contact Zhanine Smith, Principal Planning Officer who is the Councils Aviation Lead, as detailed below.

Yours faithfully



Graham Thomas
Head of Planning and Sustainable Development

Enquiries to:

Zhanine Smith, Principal Planning Officer (Spatial Planning) and Aviation Lead



APPENDIX

Essex County Council Response to S62A/2023/0022 - London Stansted Airport, Bassingbourn Road, Stansted CM24 1QW (8 September 2023)

Strategic Growth Context

London Stansted Airport is a key international gateway to the East of England, and the third largest airport in the London system; It is also the busiest single terminal airport in the UK. Prior to the Covid-19 pandemic the airport passenger throughput reached twenty-eight million passengers per annum (mppa) in 2019 this was the airports peak passenger throughput. In the 12 month period to April 2023 the total number of passengers that passed through London Stansted was 25.8 mppa, and MAG are projecting over twenty-eight mppa for the financial year 2024. There is now the potential for MAG to exceed pre pandemic passenger throughput. London Stansted currently serves over 180 destinations across Europe, North Africa and the Middle East, providing connections to in excess of 30 countries. The airport plays a critical role in connecting the East of England to the world, benefitting those that choose to live, work, visit and invest in the locality.

The airport is a catalyst for growth and productivity. It employs 12,900 people, within 180 companies and in 2019 contributed £1 billion gross value added to the UK economy.

In 2021 MAG London Stansted was granted permission (planning application reference - UTT/18/0460/FUL) to grow the airport to facilitate forty-three mppa without increasing the number of flights handled on the single runway. Following the granting of this planning permission, London Stansted has become only major airport with significant runway capacity within the London terminal. This is of great benefit to the eastern region and in particular Essex. It will continue to facilitate economic growth and investment that proximity to quality domestic and international air travel delivers.

ECC is also mindful of the range of airlines that operate and are/will be attracted to deliver existing and future services from London Stansted. This terminal extension is considered to enhance the passenger experience, and allow for terminal facilities to be expanded and delivered to accommodate the demands for wide bodied long haul carriers. This is likely to attract a greater diversity of air routes provided at London Stansted, benefitting those that live, work and invest within Essex and the eastern region more widely.

The pre application discussions and information presented in the planning application has indicated that the current main terminal infrastructure is at capacity at peak hours. Without further investment and expansion, facilities will not be able to meet the forecast passenger traffic throughput over the next decade.

ECC is mindful that MAG were granted permission in 2017 for an arrivals terminal building. This facility was 34,000m² and designed by architects Pascall+Watson spanning three levels. The vision at the time was for all arriving passengers to use the dedicated terminal for immigration, baggage reclaim and onward connections. This extension was to the south west side of the existing Norman Foster designed main terminal building, and was deemed to provide convenient access to the train stations and other onward travel modes. It is understood from pre application discussions and the arrivals facility is not a current priority and will not be delivered. The preference is for a rear terminal extension as this will allow MAG to provide new generation check in and baggage reclaim technology to provide an improved passenger experience.

Relationship with the Previous Planning Application for Making Best Use of Existing Runway Capacity (Reference - UTT/18/0460/FUL)

ECC is mindful when commenting on the current application that the airport has already been granted approval in 2021 to increase the passenger cap to forty three mppa, without any additional flights than previously permitted. It is anticipated that passenger numbers will grow steadily to meet those limits in the coming years. The proposed terminal extension would provide the physical means of accommodating and processing the passenger volumes already approved.

It is noted that the current application proposal will not result in any change to the associated environmental effects of airport operations that a rise in passenger numbers and air movements would create. Any potential effects arising from the proposed terminal development would be limited to the impact of the building itself, rather than the consequences of its operations within that building. In reviewing the impact of this application ECC is mindful of the relationship with the previous application.

Current Terminal Transformation Plans

The terminal transformation plans are set out in the current planning application show MAG's intention to develop a three-bay extension at the rear of the existing terminal, covering the full width of the building. The design of the terminal extension is proposed to be consistent with the current main terminal and continuing the original Sir Norman Foster design. ECC welcomes the continuation in the design of the iconic terminal building, and recognises that Sir Norman Foster designed a modular terminal to enable incremental extension as the airport grows.

The proposed development would provide new floorspace, comprising:

Extension Building Floors	Area (Gross External)
Concourse Level (Departures lounge, security, baggage reclaim, arrivals, customs and immigration hall)	16,500m ²
Mezzanine Level (bus-gates, baggage hall and plant room)	15,180m ²
Undercroft Level (baggage hall, plant rooms and ancillary accommodation)	8,360m ²
Baggage Handling Building	
Ground Floor	1,450m ²
First Floor	1,450m ²
Plant Enclosure	
Ground Floor	1,625m ²
Skylink Walkways	
3 no. Walkways – 2 levels	7,860m ²
Total	52,445m²

(Source: MAG, Planning Statement, 2022, page 12-13)

The proposed extension would facilitate an increase in the size of the departure lounge by around 45%, providing more space for passengers to relax before their flights, and offering new bars, shops and restaurants. It would provide for an extended security hall with an additional three security lanes to be fitted with next generation scanners. If permitted the extension would allow a larger baggage belts system to be installed, which is ideally required for larger aircraft typically flying long-haul routes. The proposed extension would enable an improved check-in, to provide a more spacious environment. New 'skylink' walkways may be constructed to link the main terminal to the satellites, replacing the track transit system providing passengers with more flexibility and reliability.

The proposed extension aims to provide additional space inside the terminal to cater for passenger growth up to forty three mppa, and to ensure an improved passenger experience.

Application Site

ECC notes that the application comprises 4.1 hectares and is entirely within the airport's Operational Area. It is noted that the boundary plan highlights it is in two parts –

- Terminal Area – which would comprise the extension, skylinks, baggage handling building and plant enclosure; and
- A Grassland Area comprising 1.7 hectares which is proposed for Biodiversity Net Gain (BNG).

Strategic Policy Context

This section provides an appreciation of the relevant Government policy and how it is relevant to this current planning permission.

[Department for Transport - Beyond the Horizon - the Future of UK Aviation – Making Best Use of Existing Runways \(2018\) \(MBU\)](#)

The MBU sets out Government support for airports beyond Heathrow making best use of their existing runways, subject to related economic and environmental considerations being considered. It allows airports to increase either the passenger or air traffic movement caps to allow them to make best use of their existing runways through the submission of a planning applications. It allows applications to increase existing planning caps by fewer than ten million passengers per annum (mppa). It understood that this current application is not seeking to alter the airports runway capacity or the passenger numbers, and both of which are therefore not related to this planning application. However, it is important to note that providing the terminal capacity to enhance the passenger experience is important for ensuring the efficient, effective and delivery of the previous planning application UTT/18/0460/FUL.

[Department for Transport – Airport National Policy Statement \(Airport NPS\) New Runway Capacity and Infrastructure at Airports in the South East of England \(2018\)](#)

ECC appreciates that the Airports NPS provides the primary basis for decision making on development consent applications for a Northwest Runway at Heathrow Airport, and is an important and relevant consideration in respect of applications for new runway capacity and other airport infrastructure in London and the South East of England. The Airports NPS sets out:

- The Government's policy on the need for new airport capacity in the South East of England;
- The Government's preferred location and scheme to deliver new capacity; and
- Particular considerations relevant to a development consent application to which the Airports NPS relates.

It sets out planning policy in relation to applications for any airport nationally significant infrastructure project in the South East of England, and its policies are relevant for the examination by the Examining Authority, and decisions by the Secretary of State, in relation to such applications.

For a scheme to be compliant with the Airports NPS, the Secretary of State expects to see the elements set out in the NPS comprised in its design, and their implementation and delivery secured, particularly with regard to runway length and increased capacity of air transport movements. The Airports NPS makes it clear that other NPSs may also be relevant to decisions on nationally significant infrastructure projects at airports and these

should be considered where appropriate. In reviewing the information presented in the Airports NPS it is noted that there is reference to terminal infrastructure at Heathrow, and therefore it is expected that this current application should consider the provisions set out within the Airports NPS, and provide justification as to how/whether these policy provisions are relevant to terminal transformation project at London Stansted.

[Department for Transport - Aviation Strategy entitled 'Flightpath to the Future' \(2022\)](#)

The Aviation Strategy sets out a strategic framework for the sector. It provides clarity on the key priorities and an understanding of how Government and industry will work together to deliver them. It continues to highlight that aviation enhances global connectivity and trade, and the importance of retaining the UK position as one of the strongest aviation and aerospace sectors in the world, whilst delivering a greener and cleaner sector. The strategy supports sustainable airport growth within acceptable environmental limits. It highlights support for Jet Zero, and airspace modernisation. There is a recognition for a need to enhance skills and capacity across the sector. It also demonstrates an increasing importance of General Aviation within the UK economy and the aviation sector.

ECC is also mindful of the need to ensure our airports learn lessons from pandemic and ensure that infrastructure can innovate and adapt to the challenges that may be posed by any future pandemics. The Aviation Strategy acknowledges the adaptation that airports and carriers delivered to facilitate international travel. It is recognised that the flow of passengers through terminals with enhanced restrictions presented challenges, and there is a commitment to ensure that Government is aware of the future travel systems required to manage restrictions that may be imposed by future pandemics. ECC would seek to ensure that this terminal extension provides the facilitates to allow the airport to innovate and consider future challenges within the terminal that may be posed by pandemics.

[Department for Transport - Jet Zero Strategy – Delivering Net Zero Aviation by 2050 \(2022\)](#)

The strategy sets out clear targets committing the UK aviation sector to reaching net zero, or Jet Zero, by 2050. It also highlights that Government is wants all domestic flights to achieve net zero by 2040, and all airport operations to be zero emission by the same year. It is acknowledged that the strategy sets out the Government's decarbonisation goals for the aviation sector. The strategy recognises that improvements in operational efficiency of the existing aviation system is important in reducing emissions. A commitment to this was that the Government published a call for evidence in the Spring 2023. The output of this is expected in spring 2024. This planning application has been submitted in advance of this, therefore it is important that ECC reviews the measures MAG have imposed to ensure the extension conforms to the zero emission target by 2040.

County Policy Context

Essex County Council - Flights of Fancy (2014)

The ECC policy view was articulated within the Flights of Fancy publication. It was developed to assist officers in developing the formal views of ECC to proposals set out by the Airport's Commission. The Airport's Commission was an independent commission established in September 2012 by the UK Government to consider how the UK could "maintain its status as an international hub for aviation and immediate actions to improve the use of existing runway capacity in the next 5 years". Flights of Fancy gave a clear view on ECC views for future airport capacity within the South East and provide a clear understanding of the role that Stansted may play.

Everyone's Essex

The Council's organisation strategy, which sets out a strategic aim for a strong, inclusive and sustainable economy. This strategic aim includes a commitment to deliver and maintain high quality infrastructure to support a growing economy and the delivery of new homes and communities. Achieving this requires us to ensure that the development, planning and infrastructure delivery across the administrative county. To ensure that planned growth includes provision for the delivery of ECC's infrastructure and services commensurate with the growth being planned, and to support existing and future residents and businesses. A key commitment of Everyone's Essex relates to infrastructure, namely:

We will deliver and maintain high quality infrastructure to improve opportunities for people living in Essex as well as supporting a growing economy and the delivery of new homes and communities by investing in the region of £1 billion by the end of this council.

ECC Detailed Comments:

The nature and scope of the ECC consultation responses address the following:

- Highways and Transportation
- Minerals and Waste Planning
- Lead Local Flood Authority – Flood and Water Management
- Public Health and Wellbeing
- Education – Early Years and Childcare
- Economic Growth, Regeneration, Skills, and Tourism
- Biodiversity Net Gain, Environment, Green and Blue Infrastructure
- Climate Change / Design

A response has been provided under each service area.

Highways and Transportation

Following review of the current planning application, ECC as the Highway Authority are satisfied that the conditions outlined in planning consent UTT/18/0460/FUL will cover the passenger and employment growth expected at the airport. The conditions on the decision notice and the provisions outlined in the Unilateral Undertaking dated 26th March 2021 are sufficient.

From a highways and transportation viewpoint, the impact of the current planning application is acceptable to ECC as the Highway Authority, subject to the following condition being secured to manage the impact on the local highway network for which ECC as Highway Authority are responsible:

Construction Traffic Management Plan:

No development shall take place, including any ground works or demolition, until a Construction Traffic Management Plan has been submitted to, and approved in writing by, the local planning authority. The approved Plan shall be adhered to throughout the construction period. The Plan shall provide for:

- a. construction vehicle routing
- b. the parking of vehicles of site operatives and visitors
- c. wheel and underbody washing facilities.

Reason:

To ensure that parking by operatives does not occur on the highway, to manage access for construction traffic via the most appropriate routes and to ensure that loose materials and spoil are not brought out onto the highway in the interests of highway safety and Policy DM 1 of the [Highway Authority's Development Management Policies](#) February 2011.

Minerals & Waste Planning

[Essex Mineral Local Plan](#) was adopted in 2014, the plan includes policies which seek to:

- safeguard mineral resources from unnecessary sterilisation (Policy S8);
- ensure the delivery of permitted/allocated sites for mineral working (various policies)
- ensure the continued and future operation of mineral infrastructure such as transshipment sites to facilitate the movement and processing of aggregates (Policy S5 and S8);

ECC confirms that proposed development at London Stansted Airport does not conflict with the delivery of the policies of the Essex Mineral Plan and therefore has **no objection as mineral planning authority**.

The [Essex and Southend-on-Sea Waste Local Plan](#) was adopted in 2017, the plan includes policies which seek to:

- safeguard permitted waste operations (Policy 2)
- support the delivery of allocated waste management capacity to meet identified needs (Policy 3)

ECC confirms that the proposed development at London Stansted Airport does not conflict with the delivery of the policies of the Essex and Southend-on-Sea Waste Local Plan, and therefore has **no objection as waste planning authority**.

Lead Local Flood Authority – Flood and Water Management

As the Lead Local Flood Authority (LLFA) ECC provides advice on Suds schemes for major developments. ECC have been a statutory consultee on surface water since the 15th April 2015. In providing advice ECC, and their appointed consultants, aims to ensure sustainable drainage proposals comply with the required standards as set out in the following documents:

- Non-statutory technical standards for sustainable drainage systems (NSTS)
- ECC's adopted [Sustainable Drainage Systems Design Guide](#)
- The CIRIA SuDS Manual (C753)
- BS8582 Code of practice for surface water management for development sites.

Lead Local Flood Authority position.

Having reviewed the Flood Risk Assessment and Drainage Strategy and the associated documents which accompanied the planning application and the further work undertaken and supplied ECC as **Lead Local Flood Authority do not object** to the granting of planning permission based on the following:

Condition 1:

No works except demolition shall take place until a detailed surface water drainage scheme for the site, based on sustainable drainage principles and an assessment of the hydrological and hydro geological context of the development, has been submitted to and approved in writing by the local planning authority. The scheme should include but not be limited to:

- Limiting discharge rates to 362l/s for all storm events up to and including the 1 in 100 year rate plus 40% allowance for climate change. No increase in surface water discharge from the site as a result of this development (betterment provided by water harvesting system).

- Provide sufficient storage to ensure no off site flooding as a result of the development during all storm events up to and including the 1 in 100 year plus 40% climate change event.
- Demonstrate that all storage features can half empty within 24 hours for the 1 in 30 plus 40% climate change critical storm event.
- Final modelling and calculations for all areas of the drainage system.
- The appropriate level of treatment for all runoff leaving the site, in line with the Simple Index Approach in chapter 26 of the CIRIA SuDS Manual C753.
- Detailed engineering drawings of each component of the drainage scheme.
- A final drainage plan which details exceedance and conveyance routes, FFL and ground levels, and location and sizing of any drainage features.
- A written report summarising the final strategy and highlighting any minor changes to the approved strategy.

The scheme shall subsequently be implemented prior to occupation.

Reason:

To prevent flooding by ensuring the satisfactory storage of/disposal of surface water from the site.

To ensure the effective operation of SuDS features over the lifetime of the development.

To provide mitigation of any environmental harm which may be caused to the local water environment.

Failure to provide the above required information before commencement of works may result in a system being installed that is not sufficient to deal with surface water occurring during rainfall events and may lead to increased flood risk and pollution hazard from the site.

Condition 2:

Prior to occupation a maintenance plan detailing the maintenance arrangements including who is responsible for different elements of the surface water drainage system and the maintenance activities/frequencies, has been submitted to and agreed, in writing, by the Local Planning Authority.

Should any part be maintainable by a maintenance company, details of long term funding arrangements should be provided.

Reason:

To ensure appropriate maintenance arrangements are put in place to enable the surface water drainage system to function as intended to ensure mitigation against flood risk.

Failure to provide the above required information prior to occupation may result in the installation of a system that is not properly maintained and may increase flood risk or pollution hazard from the site.

Condition 3:

The applicant or any successor in title must maintain yearly logs of maintenance which should be conducted in accordance with any approved Maintenance Plan. These must be available for inspection upon a request by the Local Planning Authority.

Reason:

To ensure the SuDS are maintained for the lifetime of the development as outlined in any approved Maintenance Plan so that they continue to function as intended to ensure mitigation against flood risk.

Summary of Flood Risk Responsibilities for your Council

ECC has not considered the following issues as part of this planning application as they are not within our direct remit; nevertheless these are all very important considerations for managing flood risk for this development, and determining the safety and acceptability of the proposal. Prior to deciding this application you should give due consideration to the issue(s) below. It may be that you need to consult relevant experts outside your planning team.

- Sequential Test in relation to fluvial flood risk;
- Safety of people (including the provision and adequacy of an emergency plan, temporary refuge and rescue or evacuation arrangements);
- Safety of the building;
- Flood recovery measures (including flood proofing and other building level resistance and resilience measures);
- Sustainability of the development.

In all circumstances where warning and emergency response is fundamental to managing flood risk, ECC advise local planning authorities to formally consider the emergency planning and rescue implications of new development in making their decisions.

INFORMATIVES:

- ECC has a duty to maintain a register and record of assets which have a significant impact on the risk of flooding. In order to capture proposed SuDS which may form part of the future register, a copy of the SuDS assets in a GIS layer should be sent to suds@essex.gov.uk
- Any drainage features proposed for adoption by ECC should be consulted on with the relevant Highways Development Management Office.

- Changes to existing water courses may require separate consent under the Land Drainage Act before works take place. More information about consenting can be found in the attached standing advice note.
- It is the applicant's responsibility to check that they are complying with common law if the drainage scheme proposes to discharge into an off-site ditch/pipe. The applicant should seek consent where appropriate from other downstream riparian landowners.
- The Ministerial Statement made on 18th December 2014 (ref. HCWS161) states that the final decision regarding the viability and reasonableness of maintenance requirements lies with the LPA. It is not within the scope of the LLFA to comment on the overall viability of a scheme as the decision is based on a range of issues which are outside of this authority's area of expertise.
- ECC will advise on the acceptability of surface water and the information submitted on all planning applications submitted after the 15th of April 2015 based on the key documents listed within this letter. This includes applications which have been previously submitted as part of an earlier stage of the planning process and granted planning permission based on historic requirements. The Local Planning Authority should use the information submitted within this response in conjunction with any other relevant information submitted as part of this application or as part of preceding applications to make a balanced decision based on the available information.

Public Health and Wellbeing

Following review of the current planning application, ECC as the lead advisor for Public Health in the county makes the following comments -

- In relation to Public Health considerations, ECC acknowledges that some of the social wellbeing elements of the employment strategy were addressed as part of the previous planning application UTT/18/0460/FUL. ECC wishes to ensure through this planning application process that the construction phase(s) for the build currently proposed provides appropriate employment practices, skills and training opportunities.
- ECC acknowledges that the current terminal is operating at full capacity at peak periods and that this creates challenges operationally and for passengers. Equally, it is recognised that further capacity is required to meet the expected forty-three mppa passenger throughput permitted through the last planning application and appeal (application ref. UTT/18/0460/FUL) in a satisfactory way. ECC would also recommend to the applicant that to ensure consistency with the Strategic Framework for Aviation document 'Flight Path to the Future' that consideration is given to ensure that the future terminal design / layout will allow the airport operator to provide for sufficient flexibility and innovative measures within the terminal to meet challenges of any potential pandemics in the future. This would allow for safer flow of passengers combined with the permitted greater terminal passenger throughput. This would include ensuring suitable detailed design, layout and configuration, with flexibility.

Education – Early Years and Childcare

ECC are mindful that construction employees will be operating on sites and therefore consideration should their child care needs should be given. Parents travel to the area to access suitable childcare options local to their place of work, and ECC notes that childcare provision is one of the biggest barriers to employment. ECC would therefore welcome further discussion with the applicant on this matter in order to ensure that appropriate provision is provided for construction employees. ECC is mindful that MAG will be reviewing their masterplan, and therefore consideration may be given to access to Early Years and Child Care facilities.

Economic Growth & Regeneration

ECC acknowledge that the uplift in employment was highlighted in the previous application UTT/18/0460/FUL, and the provisions set out in the Unilateral Undertaking in relation to skills, education and employment are consistent with this proposed application. ECC will continue to assist and review in their implementation.

ECC acknowledges that London Stansted Airport is an economic catalyst for Essex and the wider eastern region. It is also the biggest single site employer in the region within excess of 12,900 persons employed, working for over 180 on-airport companies (2019).

ECC recognise that the proposed application would ensure the more efficient and effective movement of passengers through the terminal. With capacity at the terminal constrained, and almost operating at capacity within peak periods. This proposed terminal extension would ensure that London Stansted airport can meet its planned growth aspirations and continue to attract existing and new airlines.

It is acknowledged that the new terminal infrastructure to fulfil an improved passenger experience and meet new national and international regulation is much larger and efficient. The baggage belts required to efficiently facilitate wide bodied aircraft, used for long haul are longer. ECC are supportive in accommodating the planned growth at the airport, and therefore support this application.

ECC appreciate the role that London Stansted plays in the Essex, Eastern Region and national economy, in enhancing connectivity, and the wider links to economic growth and development. It is a key asset for Essex, and is important for the wider locality extending beyond the Essex administrative boundary.

In reviewing the information supporting the current planning application it is apparent that the development of an extended terminal will result in direct employment related to the construction of the building and associated reconfiguration of the existing terminal. It is

noted that any growth in those employed at the airport, after the completion of the terminal extension is a matter that was considered at the previous application (ref UTT/18/0460/FUL).

London Stansted acts as a conduit for foreign direct investment, tourism and trade, with direct flights to more EU destinations than any other London airport and has an increasing long haul connection offer. ECC understand that the diversity of domestic and international flights (increasingly long haul) is a key asset for industry investing in Essex and the wider eastern region. It is considered that this application will assist MAG in delivering an enhanced passenger experience that is likely to be attractive to existing and future airlines, providing opportunity for more routes and services. New routes and services are seen as a key catalyst to attracting inward investment into Essex and the wider region, thus boosting the economy of Essex. There are significant emerging inward investment opportunities that Stansted serves such as Freeport East and Thames Freeport, and major commercial development sites coming forward in Essex in the future. New routes and services which the terminal expansion should facilitate will enhance the attractiveness of these sites to international investors. ECC welcomes this application and appreciates the opportunity it will create for our economy.

Skills

ECC recognises the need to support and enhance the skills and training within the aviation sector. Decarbonisation within the transport sector and the growth in the Green Sector is also important for aviation and there are and will be huge technological advancements that require enhanced skills and training for the future aviation sector workforce.

Essex has been at the forefront of recognising the importance of having a skilled aviation sector. The Stansted Airport College (established in 2015) was the first purpose built college at a UK airport. Currently the college and key partners are considering options to enlarge and diversify the training offered within the existing 500-student capacity building to meet demand as well as creating the UK's first aviation education and skills campus at the site.

The Stansted Aerozone is an aviation-themed learning hub to inspire children and young adults about the key STEM subjects of science, technology, engineering, maths and careers in the aviation industry. Since opening its doors in 2015 it has so far welcomed over 15,000 visitors.

ECC recognises that this current application is not proposing any further employment opportunities beyond those outlined in UTT/18/0460/FUL. The conditions set out in the Unilateral Undertaking therefore remain applicable. This application is deemed to support

the passenger growth planned, and will enhance the environment for current and future staff employed at the airport and is therefore supported.

It should also be recognised that the benefits to employment and skills from the project during construction alone, and cumulatively with other major projects and NSIPs across the county, are significant. ECC would therefore welcome the opportunity to collaborate with the applicant on how to maximise the benefits of the project to education, skills and employment across Essex, both during construction and operation.

ECC expects the applicant to produce an employment and skills strategy/plan for the project as required in section 5.4 of the [Essex Developers' Guide to Infrastructure Contributions](#), which should be secured through the Section 106 Agreement. This should outline the plan for delivery of employment and skills opportunities, including opportunities for apprenticeships, work placements, school engagement and skills programmes/initiatives, which would help those furthest from the job market into employment and upskill local residents to enable them to access employment opportunities on this project and other major projects/NSIPs across the county. The employment and skills plan should include a commitment to ensure local economic benefit through job creation, training schemes and use of local contractors where possible. Interventions/programmes should be based on research and engagement with the local community to establish skills, education and employment needs within the local community.

Tourism

ECC appreciate that this application is not proposing additional passenger throughput. However it is acknowledged that it will seek to enhance the current passenger experience at London Stansted Airport. This is supported as ECC are seeking to deliver high quality tourist environments. It is also acknowledged that London Stansted is a key facilitator for the tourist sector in Essex.

Visit Essex – Supporting the local visitor economy, has the remit for promoting and developing tourism across the county of Essex. Given the proposed increase in passenger numbers, and subsequent leisure trips, ECC seek to secure funding for Visit Essex to actively promote Essex as a tourism destination.

ECC wish to continue working with MAG to deliver measures to promote Essex as a tourism destination and to ensure that passengers arriving at Stansted Airport are aware that they have arrived in Essex.

Biodiversity Net Gain, Environment, Green and Blue Infrastructure

ECC's Green Infrastructure Team supports the provision of Biodiversity Net Gain (BNG) in the proposed 'Grassland Site' just outside of the airport boundary due to the safety/safeguarding constraints outlined in para 2.4.2. of the Biodiversity Net Gain Report. It is positive to see that paragraph 2.5 highlights the need for a BNG Management and Monitoring Plan (MMP). It is recommended that the MMP should also provide details of how management and monitoring will be funded for the 30 year period.

ECC supports the recommendation in paragraph 5.2.1 that a Habitat Management Plan should be submitted and approved to ensure that a minimum of 10% BNG is achieved at the grassland site.

It is positive to see the commitment to continued observation of the BNG Site in section 5.3 by a Mott MacDonald Ecologist alongside the STAL Environment Team. It is recommended that observation continues beyond 2025 and that the [company/person(s)] responsible are nominated.

The ECC GI team does not provide advice on BREEAM (section 6.0), however, it also recommends that a Landscape and Ecology Management Plan (LEMP) is submitted and approved as part of the planning documents.

ECC acknowledges that minimum 10% BNG has been met and demonstrated within the BNG Report and that there are limits with the type of biodiversity enhancement possible due to safeguarding requirements. Despite this, ECC encourage the applicant to strive for a BNG figure that goes beyond 10% and will create a greater uplift in biodiversity within the grassland site. For this, it is recommended that alternative Biodiversity enhancement measures are explored, which go beyond the measures set out within the BNG Report. The Civil Aviation Authority provides some [advice](#) on types of enhancement that does not typically cause a safeguarding issue.

ECC supports the delivery of 'a variety of green and blue infrastructure that provides an environmental support system for the community and wildlife.' ECC recommends consideration is given to the utilisation of GI and Sustainable Drainage Systems (SuDs). GI and SuDs should be developed together to maximise benefits through multifunctionality- they do this by helping to reduce flood risk whilst providing biodiversity and amenity benefits. The ECC GI team notes that the drainage basin located within the blue line boundary to the south of the airport could also provide opportunity for further biodiversity enhancement and recommends potential for this is explored, within the limitations of safeguarding.

ECC also acknowledge that MAG are reviewing their masterplan, it is recommended that the BNG creation [for this application] could provide a case study for this masterplan to understand best practice BNG within the restrictions and limitations safeguarding measures.

ECC recommends that the applicant consults and considers the [Essex Green Infrastructure Strategy](#) (2020) and [Essex Green Infrastructure Standards](#) (2022) alongside the National GI Framework (2023).

Climate Change / Design

ECC welcomes the applicant's ambitions to achieve the Jet Zero Strategy commitments alongside MAG's commitment to net zero operation by 2038.

ECC supports the design continuation in keeping with the Norman Foster design to ensure its compatibility with the scale, form, layout, appearance, and materials of the existing terminal building and appreciates the efforts to incorporate modern design methodologies to ensure a sustainable design is conducted.

ECC acknowledges that the project is proposed to meet BREEAM Excellent, and whilst not a required standard, is an important certification to achieve to demonstrate the sustainability of the development.

ECC supports the key alignments with key documentation such as the LETI Climate Design Guide, 2021 Building Regulations Part L (June 2022 update), the Uttlesford Local Plan and supplementary guidance, and the Essex Design Guide – [Net-Zero Carbon Viability and Toolkit Study](#). ECC further recommends the project sustainability KPIs be cross referenced with ECC's recently published [Essex Net Zero Policy Study](#) (July 2023) by Introba, Etude and Currie & Brown which sets out the requirements that need to be met to ensure all new buildings in Essex are net zero carbon in operation from the outset by achieving an operational energy balance on site (where possible) and therefore align with local and national climate targets. This means that they should be ultra-low energy buildings that are fossil fuel free and generate renewable energy on-site to at least match annual energy use, and exceed where possible. Specific energy targets are set for space heating and total energy use (where typology has been modelled), and this ensures high building fabric standards are achieved, highly energy efficient systems are used and energy demand is minimised.

ECC would also support a Whole Life Carbon Assessment, in accordance with RICS Guidance and BS EN 15978 methodology, to be carried out with measures identified to minimise embodied carbon emissions (in addition to the operational carbon emissions referred to above), as outlined in MAG CSR Strategy target which states, "Working with

industry experts, we will apply our methodology for calculating embodied carbon to reduce the carbon intensity of a selection of our capital projects by 2024”.

ECC acknowledges that a climate adaption strategy is to be developed to ensure the proposed extension is designed to suitably ensure adaptability for future climate conditions, as well as mitigating against the impacts of climate change.

ECC notes the ambition to integrate water recycling and grey/rainwater harvesting into the development and is encouraged by the likelihood of this being feasible within the proposed extension.

ECC supports the proposal’s fossil fuel free approach, incorporating all electric building systems during operation, with back-up power prioritising sustainable fuels. Furthermore, we would recommend the use of building systems using refrigerant with the lowest Global Warming Potential (GWP) feasible for the development and demonstrate how the selection is derived.

ECC supports the proposal for passive and active measures to be incorporated to reduce regulated energy demand and encourages this to be a key part of the heating and cooling design, prioritising triple glazing, solar shading and heat recovery where feasible. Please refer to the Essex Design Guide for recommendations for suitable methods. We also support the use of energy from the renewable solar energy source on site to power the proposed terminal as well as the proposed air source heat pump plant enclosure. We acknowledge the extension will also facilitate an improvement in the overall energy efficiency of the existing terminal infrastructure over time in order to meet the 2038 targets set by MAG. We acknowledge and recommend the use of thermal modelling to CIBSE guidance and then the continued monitoring of operational performance of the project through design stages and well into the practical operation of the completed terminal extension. The use of a Building Energy Management System (BEMS) is encouraged to ensure comparisons between actual performance with predicted and inform required activities to eliminate any performance gap is understood and acted on during the operation of the building.

ECC acknowledges the targets for sustainable material and product procurement, and we would like to see this value reach as close to 100% as feasible through effective and sustainably minded supply chain decisions. The procurement of construction materials should prioritise reused/recycled materials and domestic reclaim, starting with reuse of materials on site, followed by materials from a certified/accredited sustainable source.

ECC welcomes the significant waste targets made for 100% of non-hazardous demolition, excavation, and construction waste for reuse/recycling/recovery (diversion from landfill).

Specific targets should be implemented for reuse/recycling of waste created throughout the relevant life cycle stages.

ECC recommends that a comprehensive options report for structural materiality be conducted to assess feasibility and suitability of structural solutions. Where feasible this should incorporate sub and superstructural elements, and proposals for the low carbon material options that have been considered. This is a critical part of the BREEAM assessment, and is of pressing relevance in the requirement for low embodied carbon solutions for developments within Essex.

ECC also recommends an assessment of circular economy principles suited to the extension be conducted, to determine the key design decisions that will impact the buildings ability for adaption and deconstruction. Such recommendations could include but not be limited to avoiding permanent connections between structural elements instead favouring dismantlable connections to ensure material recovery at end of life.

To ensure measures are embedded into the detailed design of the proposal which mitigate and adapt to climate change, the following planning conditions are advised:

Condition 1 – Climate Mitigation and Adaptation Strategy, incorporating Energy Statement:

The Climate Change Mitigation and Adaptation Strategy must be submitted for approval prior to the commencement of the development. The Strategy should set out the approach being taken towards climate mitigation and adaptation and measures should cover a range of sustainability matters, including, but not limited to, water (use efficiency, rainwater harvesting, water recycling), energy (use efficiency and generation), low carbon design (passive active measures, materiality, Whole Life Carbon Assessment (GWP inc.), waste / circular economy). As part of the strategy, an Energy Statement shall be provided which demonstrates how the scheme will achieve the following targets:

- An annual space heating and space cooling demand no greater than 15kWh/m² GIA
- An annual Energy Use Intensity (EUI) no greater than:
 - 70kWh/m² for offices
 - 35kWh/m² for industrial
 - All other building types are to report on their EUI, be fossil fuel free and meet the space heating/cooling demand targets.
- An annual yield from on-site renewable energy generation which is equal to or greater than the total annual Energy Use Intensity.
- The development is fossil fuel free.

EUI's listed above use gross internal floor areas (GIA) and include regulated and unregulated energy loads. EV charging is not included in the EUI, but should be sub-metered. Renewable energy should not be included within the EUI calculation.

Calculations for all figures should be conducted using a predictive energy modelling methodology, such as CIBSE TM54 or equivalent.

The on-site renewable energy generation output should be calculated including the impact of shading and included within the Energy Statement.

Reason:

To demonstrate how the scheme will align with the objectives of the NPPF (2021), contribute to national targets in the Climate Change Act 2008 (as amended), the emerging Essex Net Zero Policy – Technical Evidence Base 2023 and with the local climate targets. This contributes to achieving the Essex Climate Action Commission target of Net Zero by 2050 as endorsed by Essex County Council and Uttlesford Council's target of the district being Net Zero by 2030. To meet the commitment outlined in MAG CSR Strategy (2020) where: "All new and replacement airport infrastructure will run on renewable energy by 2025" as well as facilitating the target of "All airport infrastructure to operate on renewable energy by 2030."

Condition 2 – In-use Monitoring:

Prior to commencement of development, an in-use Energy Performance Monitoring Strategy should be submitted for approval, outlining the principles to be implemented through the proposed BEMS, ensuring comparisons between actual performance with predicted, to inform any necessary actions required to eliminate any performance gap, including how data will be collected and reported.

Reason:

To demonstrate how the scheme will align with the objectives of the Essex Net Zero Policy – Technical Evidence Base 2023 (including the targets set out in Condition 1).

Condition 3 – As built performance confirmation:

Prior to occupation the as-built performance information should be submitted. This should include results from performance modelling demonstrating space heating/cooling demand, energy use intensity and installed solar PV output has been met.

Reason:

To demonstrate how the scheme will align with the objectives of the Essex Net Zero Policy – Technical Evidence Base 2023 (including the targets set out in Condition 1).

Condition 4 – BREEAM – prior to commencement:

Prior to commencement of the development, evidence in the form of a Pre-assessment Estimate shall be provided to show that the development is capable of achieving a minimum BREEAM rating of ‘Excellent.’

The Pre-assessment Estimate shall be provided by a qualified and registered BREEAM assessor. The appropriate BREEAM Assessment method based on the 2018 methodology (or current methodology if superseded) shall be selected by the assessor based on the typology of the building being assessed.

Reason:

To provide assurance that the development is capable of achieving BREEAM ‘Excellent’ in accordance with the targets set out in the application proposals.

Condition 5 – BREEAM – post construction:

Within 3 months of practical completion, a Post Construction Certificate shall be provided for the development, showing that it has achieved a minimum BREEAM 2018 (or later) rating of ‘Excellent’.

The assessment and certificate shall be provided by a qualified and registered BREEAM Assessor.

Reason:

To demonstrate that the development after Post Construction Review achieves BREEAM ‘Excellent’ in accordance with the targets set out in the application proposals.