

Mr C. Parker Planning Inspectorate 3J Kite Wing Temple Quay House 2 The Square, Bristol BS1 6PN Direct Dial: 01223 582784

Our ref: P01564444

22 September 2023

Dear Mr Parker

T&CP (Development Management Procedure) (England) Order 2015 & Planning (Listed Buildings & Conservation Areas) Regulations 1990

LAND AT LONDON STANSTED AIRPORT, BASSINGBOURN ROAD, ESSEX Application No. S62A/2023/0022

Thank you for your letter of 31 August 2023 regarding further information on the above application for planning permission. On the basis of this information, we offer the following advice to assist your authority in determining the application. Our comments below should be considered alongside our previous letter of advice dated 25 August 2023.

Historic England Advice

Significance

Stansted Airport Terminal is an iconic piece of architecture, designed by the internationally renowned practice of Foster+Partners in collaboration with Arup Engineers. The project was appointed in 1981 and the terminal opened in 1991. In 1990, the building was awarded the European Union Prize for Contemporary Architecture/Mies Van der Rohe Award, alongside other numerous awards.

The building is recognised as a landmark work of high-tech architecture, and a seminal building. The concepts pioneered on Stansted Airport Terminal would be further developed in subsequent airports designed by the firm, such as the Hong Kong Chek Lap Kok International Airport (1997) and Beijing Capital International Airport (2008), two of the world's current largest and most advanced airports, as well as influencing other airport planners worldwide.

The current terminal was designed to support 15 million passengers per annum (mppa). It was conceived as a single arrivals/departures passenger terminal operating in relation with 4 satellites, linked by an automated Tracked Transit System (TTS). When first opened in 1991, it operated with two satellites, a third satellite was added in 1999.



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Stansted Airport is also the third largest airport in London and one of the busiest airports in UK; a key international gateway handling over 27mppa. In 2017, permission was granted for a new arrivals building to accommodate future increases; this was however, not implemented. In 2021, permission was granted for the annual passenger cap to be increased from 35 to 43mppa. This latter figure is considered the maximum throughput the airport could achieve with a single runway and represents a substantial increase to the original capacity for which the terminal was designed.

The vision and future aims for the airport were set in the Stansted Airport Sustainable Development Plan 2015 (SPD); this document was set to be revised at least every 5 years. The document considered the TTS as a vital infrastructure to the efficient running of the terminal. The need for replacement or complete refurbishment of the vehicles in the medium term was acknowledged (land use document, page 35). A review in conjunction with both passenger user groups and airline partners was envisaged in order to establish its long term future. It is unclear whether this has taken place.

Impact of the proposals on significance

The applicant has submitted a Heritage Statement (ARS Report N^o 2023/125). The document provides an outline of the historical development of the airport, description and assessment of significance. It also examines the impact resulting from the proposed interventions, namely, the extension in three bays of the terminal building and enclosing of the airside canopy, and the partial demolition of the TTS and its replacement with walkways. The replacement of the TTS is largely argued on economic and passenger flow management terms. The removal of this infrastructure would render the airfield's canopy without a function, being subsequently enclosed by the extension.

Whilst we welcome the production of this document, we disagree with its assessment that the proposals would cause *minor* harm to its significance.

The proposals would remove elements that were integral to the idea of how the terminal and satellites operated and were experienced. There will also be a considerable change on the appearance of the terminal building on the airfield side; this would have the effect of unbalancing the transversal section of the building, with open canopies on either side. These interventions would have a strong impact on the architectural significance of this building, which we consider has great potential to be of national significance.

In terms of movement and relationship of the terminal with its satellites, the current proposals do not take into account the original concepts in which the airport was



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designed, neither have explored whether its principles could be followed.

For example, the TTS is considered a pinch point on the flow of passengers through the airport. This could be partly because the maximum efficiency of the system would have been achieved when the four satellites were completed, as the infrastructure would operate on a full loop. However, when the third satellite was implemented, this was not connected to the TTS, but to a separate airlink. It would seem reasonable to assume that the full track was laid out at the outset, with the stations subsequently developed in parallel to the construction of the satellites. As an options appraisal has not been included, it is unclear whether the option of reinstating/completing the full loop has been explored.

The current TTS is considered unfeasible, the changes in airport environment being cited as one of the reasons (ARS report, page 43). However, it is worth noting that a good number of the most recent, largest international airports incorporate similar automated people mover systems in their designs. The system is therefore apt to serve modern requirements, the issue being the cost of upgrade and maintenance, particularly when compared to the cost of constructing and serving the walkways.

The replacement of the TTS with long skylinks is argued to improve passenger experience. However, the use of skylinks would not appear to deliver a more efficient management of passenger flow, but simply to spread it out over a longer distance. The argument of an improved passenger experience is therefore challenged.

Planning Policy Considerations

We consider the following paragraphs of the NPPF are of relevance on the assessment of this application:

Paragraph 189 explains that heritage assets are an irreplaceable resource and should be conserved in a manner appropriate to their significance, so that they can be enjoyed for their contribution to the quality of life of existing and future generations.

Paragraph 192. In determining applications, local planning authorities should take account of a) the desirability of sustaining and enhancing the significance of heritage assets, b) the positive contribution that conservation of heritage assets can make to sustainable communities and c) the desirability of new development making a positive contribution to character and distinctiveness.

Paragraph 194. In determining applications, local planning authorities should require an applicant to describe the significance of any heritage assets affected, included any contribution made by their setting. The level of detail should be proportionate to the asset's importance and no more than is sufficient to understand the potential impact of



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the proposal on their significance.

Paragraph 197. The effect of an application on the significance of a non-designated heritage asset should be taken into account in determining the application. In weighing applications that directly or indirectly affect non-designated heritage assets, a balanced judgement will be required having regard to the scale of any harm or loss and the significance of the asset.

In turn paragraphs 199 and 200 ask to give great weight to the conservation of heritage assets, irrespective of the level of harm, with any harm to have clear and convincing justification.

Historic England Position

The need for the upgrade of the infrastructure is not disputed. However, we remain concerned about the impact the proposed interventions would have on the architectural significance of this iconic landmark of airport planning design.

It is also unclear whether the proposed interventions would be enough to appropriately manage the substantial increase in passenger numbers granted. For an infrastructure of this relevance, we would expect to see a more thorough options appraisal of the options considered and how these fit with the vision for the airport and previous granted proposals.

Ultimately, there stands the question of what is the maximum capacity the terminal can carry without losing the attributes that merited its recognition as a landmark referent on airport planning design, not only in terms of its innovative architectural design, but also in terms of its functionality, efficiency and use of cutting edge technology.

Finally, we also draw your attention to the comments submitted by the C20 Society and their intention to submit a listing screening. Consequently, we would recommend that determination of the application is halted until this assessment is carried out, its significance assessed, so that appropriate weight can be given to the impact on the architectural values of the building.

Recommendation

Historic England has concerns regarding the application on heritage grounds. We consider the issues and safeguards outlined in our advice need to be addressed in order for the application to meet the requirements of paragraphs 189, 192, 194, 197, 199 and 200.



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In determining this application you should bear in mind the statutory duty of section 66(1) of the Planning (Listed Buildings and Conservation Areas) Act 1990 to have special regard to the desirability of preserving listed buildings or their setting or any features of special architectural or historic interest which they possess.

Your authority should take these representations into account in determining the application. If there are any material changes to the proposals, or you would like further advice, please contact us. Please advise us of the decision in due course.

Yours sincerely

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