

EAST HERTS COUNCIL

EXECUTIVE – 4 NOVEMBER 2014

REPORT BY EXECUTIVE MEMBER FOR STRATEGIC PLANNING  
AND TRANSPORT

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STANSTED AIRPORT PUBLIC CONSULTATION: DRAFT  
SUSTAINABLE DEVELOPMENT PLAN, SEPTEMBER 2014

WARD(S) AFFECTED: ALL

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**Purpose/Summary of Report**

- To detail the public consultation by Stansted Airport on its draft Sustainable Development Plan, and to agree the Council's response to it.

**RECOMMENDATION FOR EXECUTIVE: That:**

<b>(A)</b>	<b>Stansted Airport be informed that, in respect of its public consultation on its draft Sustainable Development Plan, paragraphs 2.7 to 2.63 of this report form the Council's formal response.</b>
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1.0 Background

1.1 Stansted Airport has issued a draft Sustainable Development Plan (SDP) for 10 weeks public consultation between 2nd September and 7th November 2014.

1.2 The consultation material, which is split over five documents, sets out the proposals for the future growth and development of the airport.

1.3 Following the close of the consultation on 7<sup>th</sup> November 2014, Stansted Airport will consider the representations made and currently aims to publish a Final SDP by late 2014.

2.0 Report

2.1 Stansted Airport is the third largest London airport and currently handles around 18 million passengers per annum (mppa) who

travel to around 150 destinations across 30 countries, which are predominantly short haul and North African.

- 2.2 Manchester Airports Group (MAG) acquired the airport from BAA in February 2013 and is committed to increasing growth of its business. Stansted currently has planning permission to increase flights to accommodate 35mppa on its single runway. The draft SDP, the subject of the current consultation, is intended to replace BAA's 2006 Interim Master Plan.
- 2.3 The draft SDP states the current aspirations of MAG in respect of its potential future development. The consultation envisages that, in optimising the use of existing capacity, between 40 and 45mppa could be accommodated at the airport (although the operational constraints of the single runway would be more likely to limit the upper level to around 43mppa). The SDP also envisages potentially almost doubling cargo throughput to 400,000 tonnes pa.
- 2.4 It is to be stressed that there is no intention through this document to introduce proposals for any additional runway. However, it should also be noted that the Airports Commission, headed by Sir Howard Davies, is due to publish its Final Report in 2015. While the findings of the Commission are currently unknown, it should be noted that Stansted Airport is one of a number of long term options under consideration to provide additional runway capacity to meet future increased demand. A separate consultation will be carried out in respect of the findings of the Airports Commission and therefore this should not be confused with the current consultation by Stansted Airport.
- 2.5 The draft SDP itself is split into five individual documents, covering:
  - Summary
  - Economy and Surface Access
  - Land Use
  - Environment
  - Community

Each of the latter four documents focus on different aspects of the proposals for growth at the airport. A copy of the Summary document is included at **Essential Reference Paper 'B'**, with the whole draft SDP available for viewing at:

<http://www.stanstedairport.com/developmentplan>. It should be

noted that there is a difference in page numbering between downloadable and print versions of the documents. Where page numbers are referred to in this report, they related to the downloadable versions.

2.6 The Stansted Airport website provides a synopsis of MAG's draft aims and targets:

1. **Make the most effective use of our runway and infrastructure.** This will help provide more choice and range of destinations and airlines we offer, including long-haul services;
2. **Maximise the use of our land providing a safe, efficient and commercial operation** to allow our business and those of our tenants and partners to grow. This will include the creation of new passenger and airside facilities;
3. Unlock economic growth and create more jobs in our region - **making full and efficient use of the single runway has the potential to generate £4.6bn in GVA and create an extra 10,000 jobs on-site;**
4. Continue to **support local business through our Meet the Buyers events.** By 2017, we hope to generate over £2m worth of new contracts for local businesses;
5. **Maintain our number one position for public transport usage** and champion initiatives to improve rail links to London and Cambridge, increase bus connectivity and encourage more of our staff to choose sustainable ways to get to work;
6. Commitment to invest in energy efficient and low carbon technologies with the **aim for airport operations to become carbon neutral;**
7. Seek to **minimise the impact of all aspects of noise with a target to tighten our noise** penalty limits;
8. Reduce, reuse, recycle – **target to recycle 70% of waste by 2020** with zero landfill waste;

9. Establish a **new on-site education centre** providing a flexible and inspirational learning environment to inspire the workforce of tomorrow;
10. Continue to improve the **Stansted Airport Employment and Skills Academy**, helping to provide training and jobs for local people with an aim to get 550 local people into work a year whilst **increasing apprenticeship opportunities** for young people.
- 2.7 In terms of this Council's response to the consultation, it should be noted that the draft SDP poses a series of questions in each of the four main subject documents. However, many of the issues raised separately are inter-related across the piece and therefore it is more appropriate that issues be considered as a whole rather than being framed around answering set questions.
- 2.8 While there are several issues that should be taken into account by MAG before progressing its draft SDP through to final publication, and these are detailed throughout this report, there a number of very positive aspects of the draft SDP.
- 2.9 The principle of MAG developing a new SDP for Stansted Airport is to be welcomed as a replacement for BAA's, now outdated, 2006 Interim Master Plan. It provides a fresh impetus for improvement at the airport and signals the current owner's intentions to continue to revitalise the airport and further its economic recovery from the position which it inherited. Linked to this, the current £80m investment scheme for the terminal transformation is seen as a very positive outcome of MAG's ownership.
- 2.10 MAG's outreach projects to local communities and support for developing employment openings and awareness raising of opportunities around the airport from a young age are also most welcomed.
- 2.11 However, in regard to certain proposals within the draft SDP, there are a number of matters which it is considered should be addressed before the Plan is finally adopted.
- 2.12 Firstly, it is currently unclear what the status of the draft Plan is. The Aviation Policy Framework<sup>1</sup> (APF) provides advice on the

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<sup>1</sup> Aviation Policy Framework, DfT, March 2013

content of Airport Master Plans. However, while the consultation states that the SDP is proposed to replace the BAA 2006 Interim Master Plan, it is not itself labelled as a Master Plan. While detailing the APF document within its National Policy Section, it does not fully comply with the contents of that guidance and these areas are discussed later in this report.

- 2.13 The draft SDP confirms that all of its development proposals can be accommodated within the current confines of the airport site. It also seeks to ensure that passengers and businesses have the necessary transport infrastructure and connectivity to compete and grow; however, these aspects would certainly have an impact beyond the site boundaries, even with MAG envisaging that it would make the most of existing on site infrastructure.
- 2.14 In respect of the increased passenger numbers proposed in the draft SDP (to between 40 and 45mppa), it should be noted that, while planning permission for expansion to 35mppa was granted by the Secretaries of State in 2008, the permission has not yet been implemented, largely due to the effects of the economic recession. To increase passenger numbers beyond 35mmpa, a further formal planning application would be required.
- 2.15 As of the end of May 2014, passenger throughput stood at 18.2mppa with a total of 133,900 Air Transport Movements (ATMs), which is well below the 35mppa permission. MAG has projected that it is likely to reach the 35mppa threshold by 2025. This is considered to be an ambitious growth rate, and contrasts with the Airport Commission's predictions of capacity not being reached at Stansted until 2040 at the earliest<sup>2</sup>. While forecasting is not an exact science and it is acknowledged that MAG considers that the Airports Commission has underestimated the rate of passenger growth at the airport, it is still likely that at least another 10 years of unused capacity remain before permitted passenger levels are reached.
- 2.16 The consultation states that, for the assessment of certain environmental and surface access effects, a figure of 43mppa has been used as the maximum throughput that the airport could achieve with a single runway; owing to capacity limits of the runway and the associated infrastructure. This begs the question why an upper limit of 45mppa is being promoted if in fact only 43mppa could be achieved. Throughout the consultation very little technical evidence appears to have been made publically

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<sup>2</sup> Source: *Airports Commission: Airport Level Passenger Forecasts 2011 to 2050, January 2014*

available to underpin the envisaged increase in passenger numbers to between 40 and 45mppa.

- 2.17 Many intentions are expressed about mitigating the impacts of projected levels of development without interested parties having the ability to view any transparent evidence base or analysis that may exist. Therefore, it is not possible to understand how any data relating to either potential impacts or mitigation measures has been derived or for any scrutiny of that material. The APF states, in respect of Master Plans, that “the body of the document should be accessible to a lay person, and the technical detail clearly annexed”. The latter element has not been achieved in the draft SDP and it should therefore be revised to provide much greater clarity over its evidence base. If full inclusion of data in the documents is not appropriate then, in line with the Government’s guidance, this detail should be annexed. It would also be helpful if such information were to be signposted throughout (e.g. via links to appropriate website pages).
- 2.18 It is also noted that elements of technical evidence are yet to be completed and therefore the impact of any potential findings is yet unknown. Particular incomplete evidence base areas relate to traffic modelling and air quality impacts, which are key elements to underpin any airport development plan. Any material amendments to the SDP arising from these studies could occasion the need for further public consultation. In any event it is considered that a further round of public consultation should be carried out in order to allow respondents opportunity to comment in light of the technical evidence once published.
- 2.19 In the current absence of such evidence, and without the full impacts of the permitted 35mppa on both local and wider areas yet being known (and unlikely to be so for at least another decade), it is not considered that there is justification for lifting the current planning caps at Stansted.
- 2.20 Setting aside matters of principle, should the proposals for increased passenger numbers be advanced, various matters should be taken into account in the final SDP documents. Comments have been made, not in order of importance, but rather to reflect the same format as the suite of documents forming the draft SDP.

### **Economy and Surface Access**

- 2.21 In respect of transport, accessibility to the airport should be enhanced to ensure users have the availability of surface access

necessary to meet their needs and this is rightly acknowledged in the document. Enhanced connectivity is seen as “a key factor in driving economic regeneration and productivity in some local areas around the airport” (p08). Further it is stated (p09) “We are committed to... deliver high quality and reliable transport infrastructure with sustainable travel choices for both passengers and employees”.

- 2.22 However, connected to the discussion above in relation to lack of technical evidence, there is no analysis provided of the impact that any changes to existing planning caps may have on surface access to the airport. This should have been undertaken and issued in tandem with the draft SDP in order that the funding and delivery of necessary improvements to the rail and highway networks could be identified and mechanisms for achieving these be stated. This should then serve as a basis for establishing and formalising partnership arrangements with relevant infrastructure providers and key stakeholders (as detailed p08) to enable delivery with contributions (both technical and financial) from Stansted commensurate with the scale of impact generated by increased airport related movements.
- 2.23 Stansted’s record of achieving highest modal share of passenger trips to any UK airport by public transport (around 51%) is to be commended and it is most encouraging to see a commitment to continue supporting modal shift away from car-borne journeys, especially for staff.
- 2.24 However, it is recognised that there are various impediments to modal shift and these should, where possible, be addressed through the SDP to ensure that users have the opportunity to reach the airport in the most sustainable manner.
- 2.25 The possible uptake of passenger transport is limited in part by inflexible timetabling which does not allow either passengers or employees (who work shifts that extend considerably beyond the hours of opening to passengers) to access Stansted by rail or bus at certain times from late evening to early morning.
- 2.26 Furthermore, bus access from parts of East Herts to the airport is difficult, especially during off-peak times. This results either in workers from the district utilising car borne travel where convenient bus services do not exist, or that some potential employees would be unable to take up positions at the airport. There is already a past acknowledged recruitment issue at the airport with significant numbers of job vacancies. This position

may well be exacerbated as employment opportunities increase through the development proposals in the draft SDP.

- 2.27 MAG should therefore focus on supporting improved bus services to and from their employment base from, inter alia, the key towns in East Herts including Bishop's Stortford, Hertford, Ware, Buntingford and Sawbridgeworth, to provide access for existing and potential employees. Where demand exists for bus timetable extensions on existing routes or for the introduction of new services, MAG should deliver financial support to secure their provision, both initial and on-going.
- 2.28 In relation to rail, there are a number of key priorities, some of which lie outside the auspices of MAG to provide, but others which are in the company's control to effect.
- 2.29 The draft SDP's ambitions to increase rail services between the airport and London, Cambridge and beyond are generally supported, as long as these are not at the expense of commuter services on the West Anglia Main Line (WAML).
- 2.30 It is already widely acknowledged that the WAML is in desperate need of enhancement to ensure that it is equipped to cope with both existing and anticipated increased demands on the route. The 4-tracking of the West Anglia Main Line to Broxbourne and improving rail connectivity to London, especially Stratford, are seen as key infrastructure measures to support this. Further measures to enhance links to Stansted are also supported, provided that they do not impact on local services in the district. Stansted Airport should continue to press Network Rail for preparatory work on 4-tracking to be undertaken during Control Period (CP) 5, to ensure that the main scheme could be implemented early in CP6.
- 2.31 Enhanced connectivity from wider destinations (in Hertfordshire and beyond) should be investigated, particularly to enable easier and fewer transfers between routes. The feasibility of introducing timetabling to enable trains to stop at additional stations on some Stansted bound journeys should be examined with the aim of improving connections and reducing car borne trips.
- 2.32 More local to the airport, it is considered that, contrary to the statement in the draft Surface Access proposals that the current single track tunnel beneath the runway would be sufficient, this may not prove to be the case in the longer term, as the single tunnel would continue to limit the airport to 6 arriving and 6



departing trains per hour. Although the capacity of those trains could be increased via the Stansted Express rolling stock being extended to 12 car trains, connectivity would still be restricted and would not allow for greater frequency or increased service provision beyond that.

- 2.33 Even though it is not currently envisaged to directly serve the airport, the planned Crossrail 2 scheme would provide improved links from London via connection at Tottenham Hale with its existing access to the Stansted Express. This initiative, coupled with the 4-tracking proposals already identified above, could lead to significantly increased numbers of passengers seeking to access the airport via rail. In the event that the Crossrail 2 scheme was to be extended to serve the airport in the future, there are doubts that there would be enough spare capacity for these services.
- 2.34 In light of all of the above, it is therefore considered prudent that MAG should aim to plan in the medium to long-term to provide additional infrastructure for the potential passenger numbers that these initiatives could engender. Such planning should include investigating the potential to provide a second bore, so that the station at the airport would be in a position to enable greater frequency of services and accommodate additional passenger numbers travelling by train. While not needed at the current time, delivery of such infrastructure invariably follows a very lengthy process and therefore the profile of such a scheme should be raised at the earliest opportunity.
- 2.35 For car-borne traffic (and indeed for bus and coach travel), a challenge for Stansted is to improve connectivity and, in this respect, east-west surface access presents particular issues. Because Hertfordshire's key road and rail links are primarily of a radial nature based around access to/from London and the main towns, this can present difficulties for road users accessing the airport, especially at peak times. While the planned opening of the A120 Little Hadham Bypass in 2019 should go some way in alleviating one of the main congestion points on an important road corridor to the airport, raised passenger numbers could negate some of these gains via increased trip generation. As a considerable number of increased trips would be generated even as a result of currently permitted growth at, and related to, the airport, it would be appropriate for MAG to both support HCC's longer term aims to complete the upgrade of the route via the bypassing of Standon and Puckeridge and to make a financial

commitment towards its future delivery through partnership arrangements.

2.36 Should growth beyond permitted caps be progressed then it is important that the full impact of future trip generation be assessed and mitigation measures/necessary infrastructure be identified and provided commensurate with such impact. In particular, improved capacity on the M11 should be addressed via any proposals. The A120/M11 junction (J8) has already been identified as having capacity issues, especially at peak times, and specific improvements to this junction should be identified to relieve pressure at this point. North-facing slip roads, that have previously been suggested, should be considered among a range of potential improvement measures.

2.37 In respect of the M11 itself, which is regularly plagued by disruption and closure due to accidents, it is considered that a daytime HGV no-overtaking ban between J8 and J9 (which already has the support of the Highways Agency following a previous trial) could be made permanent to help ameliorate conditions and improve trip reliability. This measure could potentially also be extended to include the stretch from J7. Other potential improvements on the M11 should also be investigated. In this regard, Stansted should state its intentions in the SDP that it will work in partnership with the Highways Agency to effect the best solutions to ensure that journey reliability is improved.

2.38 Furthermore, the APF states:

5.11 All proposals for airport development must be accompanied by clear surface access proposals which demonstrate how the airport will ensure easy and reliable access for passengers, increase the use of public transport by passengers to access the airport, and minimise congestion and other local impacts.

5.12 The general position for existing airports is that developers should pay the costs of upgrading or enhancing road, rail or other transport networks or services where there is a need to cope with additional passengers travelling to and from expanded or growing airports. Where the scheme has a wider range of beneficiaries, the Government will consider, along with other relevant stakeholders, the need for additional public funding on a case-by-case basis.

- 2.39 As the evidence base for transport is not currently available and modelling to factor in increased passenger numbers is yet to be undertaken, it is not possible to assess the impact that these would have in terms of road or rail. As the APF states that the developer should pay the costs of upgrades, it is not sufficient for MAG to state that it does not consider that the proposals would incur the need for any further infrastructure without the ability of interested parties to test such assertions.
- 2.40 However, MAG's commitment to partnership working with key stakeholders is welcomed and it is considered vital that this occurs in relation to the identification and delivery of strategic and local transport infrastructure. Partnership arrangements should be immediate and on-going.
- 2.41 In terms of economic matters, the proposals to meet employment provision within the confines of the airport are welcomed. While it is recognised that the local economy benefits from operations at Stansted and maintains a feeder role, East Herts continues to support the principle of any directly air-related enterprises being located on site. Likewise, future job creation at the airport is supported.

### **Land Use**

- 2.42 Stansted Airport lies within the boundaries of Essex and, where proposals are of a nature not to be considered a nationally significant infrastructure project to be determined under National Infrastructure Planning procedures, determination of applications lies with Uttlesford District Council. All proposals, in addition to complying with national policy, should be in accordance with both the adopted Uttlesford Local Plan, 2005, and the emerging Uttlesford Local Plan.
- 2.43 In respect of the current draft SDP Land Use Plan document, this refers to specific buildings and areas throughout the text which have not then been notated on the plans included within the document. The final SDP should ensure that these are shown for clarity for the reader, especially those unfamiliar with the layout of the airport.
- 2.44 The draft SDP states that an increase in cargo capability would result in around 400,000 tonnes per annum being handled at Stansted on dedicated cargo aircraft (and almost doubling from

213,000 tonnes to year end August 2014) plus an additional 60,000 tonnes in belly freight.

- 2.45 However, it is not clear whether this takes into account the fact that the role of freight operations are subject to considerable change. Traditionally, a significant proportion of freight transfer has been accommodated via belly-hold operations (i.e. using cargo hold space in passenger aircraft). However, the introduction of the A380 and Dreamliner aircraft, which are increasingly coming into operation, may have an impact for freight operations on existing and future aviation capacity as these aircraft concentrate on accommodating larger passenger numbers at the expense of cargo space. Therefore, as the quantity of belly-hold freight carried by these aircraft is smaller than that of their predecessors, this could potentially have significance in terms of demand for additional increased stand-alone freight movements. The draft SDP fails to articulate its approach to potential diminishing belly-hold freight and whether this would impact on the predicted figures as stated. Likewise, the long-haul aspirations of MAG may also have an impact on freight operations.
- 2.46 Furthermore, there is a concern that, as any spare capacity in day time flights is used up by passenger aircraft, this could have a knock-on effect of increasing the potential for night flights, especially for cargo. Such a move would not be supported and the issue should be addressed through the SDP, so that the full impact of potential freight movements can be fully assessed. Further discussion of night flights is included at paragraph 2.50 below in respect of the Environment document.
- 2.47 Beyond the issues raised in the Land Use document, it is further recommended that MAG should state its intentions to liaise with district councils around the issue of airport parking. While the strategy within the draft SDP is noted, there is currently no acknowledgement of current parking practices of some passengers who choose to park in residential areas in neighbouring settlements then travel by bus or taxi to the airport to avoid parking fees. Where there is a persistent issue, MAG should, as part of its parking strategy, commit to helping the local authority investigate ways to ameliorate the situation and thereby improve the local amenity of residents.

## **Environment**

- 2.48 In respect of the environment, this volume states (p05) that:

In particular the advance of aircraft and vehicle technology and the outlook for further improvements in the lifetime of this plan suggest future noise impacts will be lower than previously assumed and we are confident that local air quality will remain well within the Government's limits.

- 2.49 This assertion in the draft SDP is to be welcomed; however, it should be underpinned by technical evidence to support this position, which is currently either not provided as part of the consultation or is incomplete.
- 2.50 There are particular concerns relating to the issue of night flights (also discussed in respect of the Land Use volume in relation to cargo above). As there is an inter-relationship between the two issues, it is important to consider the potential impact that an increase in cargo movements could have on increased numbers of night flights and thus a direct impact on the amenity of residents under flight paths who would be affected by such.
- 2.51 Page 24 of the Land Use document states that “we believe that there would be benefits in amending the way the current restrictions operate, potentially through the introduction of a specific ‘night noise envelope’. To move to a locally determined night noise regime would require the Government to remove Stansted’s current designation for the purposes of noise control”.
- 2.52 The implications of this could be an increase in night flights. It is not considered appropriate that there should be any increase in night flights and this Council would not support any such proposals, nor would a move to local control be supported.
- 2.53 Furthermore, there is no detail within either Land Use or Environment section over mitigation measures to provide respite for residents affected by night flights, contrary to the aims of the APF (paragraph 3.35). Moreover, there is no discussion around any possible alternative approaches to an increase in night movements that may exist. MAG should therefore examine the potential to reduce the impact of night flights at a local level while working within the Government’s ‘designated’ centrally set limitations.
- 2.54 In relation to noise envelopes, the SDP should address the advice contained in the APF (paragraph 3.29) in relation to new runway capacity and therefore seek to restrict its current noise contours as technology advances allow, rather than simply to “Continue to ensure that the daytime noise contour (57dB<sub>LAEQ, 16hr</sub>)

will not exceed an area of 33.9km<sup>2</sup>” (p39). The airport should therefore work towards improving existing noise impacts and seek to demonstrate what further improvements can be made going forward as movements increase at Stansted, rather than promoting working within an envelope predicated on earlier technology.

2.55 It should be understood also that noise at night is not confined to that generated by aircraft movement, but also from ground activities and associated road access trips, which extend considerably beyond the airport boundaries.

2.56 In terms of air quality, the airport’s aspirations to minimise emissions are supported. However, in the absence of the completion of the detailed air quality assessment currently being undertaken, it is not possible to fully comment on the future air quality proposals within the draft SDP.

2.57 Matters that should be taken into account include an assessment of whether there would be any additional impacts from the alteration in planning caps to the air pollution in relation to combustion of aviation fuel, potential inefficient aircraft engines, particulate matter released from worn/burnt aircraft tyres, fuel tanks and transfer facilities and vehicles travelling to and from the airport and ground services.

2.58 Any additional impact on human, animal and plant health should be also assessed and appropriate mitigation measures put in place to ensure negative effects are minimised.

2.59 Potential impacts in terms of increased light pollution should also be assessed and mitigation measures identified where possible.

### **Community**

2.60 The draft Community Plan illustrates the links that have been forged by MAG with local communities since purchasing the airport. Its initiatives to be focussed over coming years show commitment to improving conditions with local communities and forging relationships, especially those aimed at young people. Career opportunities are linked through educational projects, such as the Employment and Skills Academy.

2.61 Throughout the consultation, numerous public events and opportunities for the public to engage in the process have been

arranged and it is encouraging to see the efforts made in this respect.

- 2.62 An on-going commitment to partnership working with key stakeholders is also supported.
- 2.63 In conclusion, in light of all of the above, it is considered that the introduction of a draft Sustainable Development Plan to replace the previous Interim Masterplan should be welcomed as a concept, albeit that its status should be clarified. However, in addition to the need to take into account representations made to the consultation, the finalisation of the document should be reserved until such time as the (currently incomplete) technical evidence base is available for public and stakeholder scrutiny to either underpin the proposed policy approaches or to inform their potential reshaping.

### 3.0 Implications/Consultations

- 3.1 Information on any corporate issues and consultation associated with this report can be found within **Essential Reference Paper 'A'**.

#### Background Papers

- Stansted Airport Draft Sustainable Development Plan, September 2014: <http://www.stanstedairport.com/developmentplan>.
- Airports Commission: Airport Level Passenger Forecasts 2011 to 2050, January 2014:  
<https://www.gov.uk/government/publications/airports-commission-airport-level-passenger-forecasts-2011-to-2050>
- Airports Commission Interim Report, December 2013:  
<https://www.gov.uk/government/publications/airports-commission-interim-report>
- Aviation Policy Framework, DfT, March 2013:  
<https://www.gov.uk/government/publications/aviation-policy-framework>

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