



that the prisons will be for men only and hence there will be no mother and baby unit on site.

At present, there are 2 pre-schools and 1 childminder in the area, and this may not be sufficient to meet levels and the type of provision, particularly in terms of year-round care. ECC would welcome further consideration be given to any requirements as part of the formal pre-application process, and in terms of how any demand could be identified. Given the remoteness of the site the provision of childcare is unlikely to be within the immediate vicinity of the prisons. The latest childcare sufficiency data can be viewed via [Essex Childcare Sufficiency Assessment \(Autumn 2020\)](#).

Schools – Primary and Secondary

Guidance on school provision is contained in the [Developers' Guide](#), section 5.2. ECC has a statutory duty to ensure there are sufficient school places for children in Essex. Our Strategy for delivering this objective is contained in the [School Organisation 10 year plan for Essex school places 2021-2030](#). ECC acknowledge that it is unclear how to measure the impact of these MOJ proposals on demand for additional pupil places at primary and secondary level during both the construction and operational phases. However, ECC would welcome some consideration at the pre-application stage given the significant influx of potential people involved in their construction, and the 1200 – 1400 permanent jobs, and who may move to the area on a part time/full time basis.

Proposals and Layout - Design

The design and layout of buildings should reflect their location. The plans as presented propose to construct prison blocks with 4 floors, 7 separate house blocks (or living accommodation) and other support buildings, which appear to adopt a “standard approach” within the new prison programme ignoring local circumstances. Whilst it is appreciated that the detailed scale and massing of the built form are not yet specified at this early conceptual stage of the design process, ECC has concerns regarding the impact this densely built development will have on the local context/character, which must be considered in future plans.

ECC would be looking for a BREAM Outstanding rating, which is the highest rating available. This should be a design consideration imperative.

The proposition of approx. 500 car parking spaces within the centre of the site raises concerns over the proportion of hardstanding materials, which would significantly alter the site's current rural character and nature. Any parking area should implement landscape features and drainage to enhance the resilience to climate change. ECC recommend that any future design plans will be required to showcase how development reflects and responds to the local vernacular in terms of height, density, massing, materials, etc. as well as conserving the local built and natural character that exists. Design codes will be useful tool in achieving this.

ECC highly recommends a detailed review of the provided case studies outlined within page 8 of the submitted consultation document is undertaken to ensure that successful elements of prison design can be suitably implemented within this particular site's context.

Any future planning application will need to consider lighting, access to secure open space, and how the scheme will support employment, positive choices and relationships between people and the environment. This will help to ensure that the design of the new prison contributes to wider aspirations of the rehabilitation and resettlement of inmates to reduce the risk of reoffending.

ECC recommend that any future planning application should consider the following local guidance documents and design codes to ensure that the scheme conforms to Essex standards:

- Essex Design Guide - Large Footprint Buildings – reviews the principles of designing large footprint commercial/industrial buildings, layout, access, parking, materials, character, sustainability and health.
- Essex Design Guide - Higher Density Development – reviews the principles of appropriate density models and how they impact upon character and context of the local landscape. A review of suitable access requirements and parking standards for future proofing of spaces, improving mental/physical wellbeing and encouraging activity.
- Braintree | Essex Design Guide.

ECC recommend a review of other policy and guidance documents is undertaken including NPPF, the National Design Guide and the Secured By Design principles to ensure the local and wider context of the site is considered in design.

Landscape, Heritage and Environment Matters

These are matters of direct relevance and the domain of Braintree District Council as the local planning authority. In relation to this initial consultation, we have used Place Services to provide some initial commentary to help shape this phase of the consultation process.

Landscape

Initial plans involve the construction of prison blocks having 4 floors, 7 separate house blocks (or living accommodation) and other support buildings. Whilst the detailed height and dimensions of these buildings are not yet specified their significant impact on the local landscape is a significant concern that needs to be evidenced and considered in the buildings design and layout. Any designs will need to recognise and reflect local distinctiveness in terms of scale, height, density and massing of buildings, and be sensitive to the need to conserve local features of architectural and historic importance with appropriate use of landscaping. Any development should also respond positively to local character and context to preserve and enhance the quality of existing places and their environs.

ECC notes that reference is made on page 20 of the consultation document to a commitment ensuring that any new prisons will need to work with the local rural landscape, and this is described below.

The proposal will be required to have regard to the character of the landscape and its sensitivity to change, and if permitted it will need to enhance the locally distinctive character of the landscape in accordance with the Landscape Character Assessment. The proposed site is located within the Stambourne Farmland Plateau as contained in the



Braintree Landscape Character Assessment (2006), pages 73 – 75. The landscape is characterised by relatively open gently undulating arable land bounded by species rich hedgerows with trees and ditches with narrow country lanes bounded by grass verges and ditches. Wethersfield Airfield dominates the views in the south eastern area. The report includes a suggested landscape guideline to ensure that any new development is small scale responding to the historic settlement pattern and the open arable landscape.

Whilst this Character Assessment is still relevant in planning terms, it was published in 2006 and the landscape has evolved greatly in this time. ECC recommend that a localised Landscape Character Assessment at 1:25000 scale is undertaken as part of any application. Any proposal will be required to undertake a Landscape Impact Assessment consistent with guidelines contained in the Braintree DC Local Validation List - Landscape Impact Assessment as being a major development in the countryside.

ECC recommend that any future application needs to consider landscape impact and to consider the following guidance published by the Landscape Institute. The Landscape and Visual Impact Assessment (LVIA) Third Edition recognises that landscape value is not always signified by designation: '*the fact that an area of landscape is not designated either nationally or locally does not mean that it does not have any value*' (paragraph 5.26 and Box 5.1). Consequently, further LI guidance TGN 02-21 - Assessing the Value of Landscapes Outside National Designations should also be considered.

ECC welcome the opportunity to select and agree representative viewpoints to inform the assessment of effects and best practice in the Landscape Institute document TGN-06-19 Visual Representation of Development Proposals should be followed. ECC recommend the use of wireframes and photomontages (Type 4 AVR level 3) are used for visualisation representation.

Ecology

ECC require reasonable biodiversity enhancements to be provided to secure measurable net gains for biodiversity consistent with NPPF paragraphs 174d and 180d. They need to be based upon the ten principles set out in Chartered Institute of Ecology and Environmental Management (CIEEM) paper Biodiversity Net Gain - Good practice principles for development (2016).

ECC recommend any future planning application is supported by robust ecological surveys and assessments using data search records and survey information and undertaken by a suitably qualified ecologist at the appropriate times of the year using prescribed methodologies. Consideration will need to be given regarding all the likely impacts on designated sites (international, national, and local), protected species and priority habitats and species and not just significant ones. Effective and robust measures, in line with the biodiversity mitigation hierarchy of Avoidance; Minimisation, Rehabilitation/Restoration and Offsetting will be required to be identified. Any residual impacts will need to be compensated for on-site or off-site with long term management secured, and appropriate enhancements included to ensure biodiversity net gain. ECC recommends any application is supported by a completed Essex Biodiversity Validation Checklist. Any reporting on biodiversity matters should take account of the CIEEM - Guidelines for ecological impact assessment.



ECC has undertaken a high-level review of the site and identified the following. This review should be revised in more detail to inform any planning application:

- there are no statutory designated sites within 1km radius of the site;
- there are four Local Wildlife Sites within a 1km radius of the proposed site, one of which is on or adjacent to the site; and
- a review of MAGIC maps identified that the site contains, or is in close proximity to, ancient woodland and deciduous woodland Priority Habitats. The Ecological Impact Assessment will need to ensure that these sites and habitats are appropriately considered and not adversely impacted through the application process.

Any application should make use of the Great Crested Newts District Level Licensing Scheme operated by Natural England and available in Essex. Developers are able to pay a fee to join a district level licensing scheme rather than carry out their own surveys, to plan and/or carry out mitigation work. Further details can be viewed by the link above.

ECC would encourage any application to:

- seek to provide a minimum of 15% biodiversity net gain;
- to use the DEFRA Biodiversity Metric 3.0 (or any successor) in any calculation;
- submit a Biodiversity Net Gain Report (BNGR) setting out a baseline assessment, details of losses and compensatory habitat, and necessary biodiversity enhancements the BNGR should follow the CIEEM Biodiversity Net Gain Report and Audit templates; and
- reference these biodiversity requirements as an additional 'Green Aim' of the development.

Historic Buildings

ECC welcomes reference to Green Aim 8 (page 16) of the consultation document to seek ways of protecting and sustaining the heritage of the site. To be consistent with NPPF, paragraph 197, ECC recommends the aim is strengthened to 'protect and enhance' the heritage of the site rather than 'protect and sustain'.

NPPF, paragraph 189 identifies heritage assets as an irreplaceable resource that 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. NPPF, paragraph 199 states that when considering the impact of a proposed development on the significance of a designated heritage asset, great weight should be given to the asset's conservation (and the more important the asset, the greater the weight should be). This is irrespective of whether any potential harm amounts to substantial harm, total loss or less than substantial harm to its significance.

In addition, NPPF, paragraph 192 requires authorities to maintain or have access to a historic environment record to be used in assessing the significance of heritage assets and the contribution they make to their environment; and predict the likelihood that currently unidentified heritage assets, particularly sites of historic and archaeological interest, will be discovered in the future.

Place Services manage and maintain the Essex Historic Environment Record (HER) on behalf of ECC and other local planning authorities in the county. The Essex HER is the most complete, computerised database of heritage assets in Essex, containing more than



38,000 records. A summary version of the Essex HER can be searched on-line at the [Heritage Gateway](#). This resource will prove useful in the planning application process to protect and enhance relevant heritage assets both on and off-site that may be impacted by the development proposals. The proposals will be required to have regard to nearby heritage assets, including conservation areas and listed buildings, it is essential that new development is sensitive to this context, conserves and enhances their setting and provides a positive contribution to the local character of the area.

As a priority, ECC requires that any scheme should seek to minimise and mitigate negative impact on heritage assets in a way that meets the objectives of the NPPF, paragraph 206 and look for opportunities to better reveal or enhance the significance of heritage assets. ECC has undertaken a high-level assessment of the site noting the rural setting of numerous designated heritage assets including twelve Grade II Listed buildings within 1km radius of the site, namely:

- *Sculpin's Farmhouse (List UID: 1139033) – an early-seventeenth century, timber framed, plastered house within a moated site;*
- *Ffuleslo (List UID: 1123486) – a sixteenth-century timber framed house;*
- *Welcome Slough Farmhouse (List UID: 1170150) – a timber-framed house, seventeenth century or earlier;*
- *Welcome Slough Farm barn (List UID: 1122864) a seventeenth to eighteenth-century, timber framed barn;*
- *Boyton all Farmhouse (List UID: 1123485) – a timber framed, mid-sixteenth century house within a moated site;*
- *Barn approximately 60m north of Boyton Farmhouse (List UID: 1337794) – a sixteenth century barn with seventeenth-century extension, Timber framed, weatherboarded;*
- *White Hall Farmhouse (List UID: 1123313).- a timber framed, plastered house with a thatched roof, late-sixteenth century with later extensions;*
- *Deeks Farmhouse (List UID: 1122861). Seventeenth-century (or earlier) timber-framed and rough rendered cottage*
- *Morris Green Farmhouse (List UID: 1170112 – a fifteenth-century house (or earlier), with later restorations. Timber framed and plastered;*
- *Willow's Farmhouse (formerly Shelley's Farmhouse) (List UID: 1338080) – a sixteenth century house (or earlier). Timber framed and with decorative pargetting;*
- *Gainsford Hall (List UID: 1317343) – a sixteenth century Manor house, with eighteenth and nineteenth-century alterations; and*
- *Woodley's Farmhouse (List UID: 1122996) – a seventeenth-century, timber framed and plastered, house with a red tile roof.*

ECC considers that given the close proximity of these designated heritage assets to the site the impact on their setting is likely to be detrimental. There may also be a harmful impact on other, as yet unidentified, designated heritage assets after a more detailed analysis has been undertaken to inform an application.

An application will also need to consider the impact on non-designated heritage assets. Wethersfield Airfield itself is a non-designated heritage asset and listed on the Essex Historical Environment Record (HER No. HER16658) and its history can be viewed [here](#).



ECC considers there is a high potential for non-designated heritage assets to survive on the site including gun emplacements, pill boxes, observation posts, air-raid shelters and other structures from the Second World War. The HER description states that several Nissan huts and hangers survive along with the control tower. The perimeter track of the airfield survives and the loop hardstands still remain in the southwestern quadrant of the field. The layout from the Second World War survives including many dispersal areas. To the south of the proposed development site is a chapel, considered to be the first purpose built Chapel on a USAF base in the UK.

The potential layout and landscape plan identified on page 13 would remove any legible trace of the airfield and its historic phases of development. The proposed prison layout does not preserve anything of the arrangement of runways. The loop hardstands to the southwest of the site appear to have been retained in the diagram, but they would be without any context as all other traces of the airfield would have been removed. ECC recommend a more sympathetic design that retains some legibility of the historic airfield should be a starting point for any scheme.

Any application will need to be accompanied by a robust Heritage Statement (HS) using the staged approach outlined in Historic England - Statements of Heritage Significance: Analysing Significance in Heritage Assets (Historic England Advice Note 12). The HS should contain a full discussion of the form, materials and history of any affected heritage asset and an understanding of their significance, and in particular the contribution to significance made by the setting of any heritage asset. The analysis of the setting of heritage assets should use the guidance in Historic England - The Setting of Heritage Assets Planning Note 3 (Second Edition). The HS should consider the levels of impact resulting from the proposal on the significance of all designated and non-designated impacted heritage assets. It should be acknowledged that the aspects of setting are not simply to be expressed in terms of views but within the definition contained in the NPPF, Glossary, page 71.

ECC recommend early consultation is undertaken with Historic England, but also local communities, local heritage groups, historical societies, parish councils and other stakeholders (the Airfields of Britain Conservation Trust, the Wethersfield Airfield Museum and the Wethersfield Local History Group) to gain as much local information as possible.

With regards the potential impact on the historic environment ECC considers there is the potential for harm to numerous designated and non-designated heritage assets resulting from the proposed scheme. Given the level of detrimental impact on setting and the possible extent of heritage assets affected, including the historic airfield itself, at present it is unlikely the scheme could be supported from a heritage perspective should it progress to an application.

Archaeology

ECC recommend any application is informed by a detailed archaeological desk-based assessment. This will need to include an assessment of each of the surviving buildings from the WWII airfield consistent with NPPF, paragraph 194. In addition to a desk based assessment further archaeological evaluation in the form of trial trenching is likely to be required.



Wethersfield Airfield is a non-designated heritage asset comprising the World War II airfield and details of the Essex HER record 16658 can be viewed [here](#). This military history of development and use of the site contributes greatly to the interest and significance of the airfield. A survey of military airfields in Essex (Thorpe, S, 1996) identified that although the airfield has been partly developed several buildings and the original airfield layout remained.

The profile of twentieth-century military heritage and its conservation has risen in recent years due to its place in history becoming increasingly understood and valued. However, their fabric and structures are often vulnerable to neglect, decay and development. In recognition of their significance and vulnerability, a conservation guidance document on [Historic England - Historic Military Aviation Sites](#) was published in 2016 and should be referenced in as part of the evidence base work assessing the significance of the airfield. The document also refers to the importance of incorporating features such as runways, perimeter tracks and defensive structures into any new development proposals.

ECC has also identified other non-designated heritage assets at Sculpins Farm, a 17th century designated structure which lies within a moated site (EHER [6827](#)) and a Roman Road (EHER [7352](#)) which bisects the north eastern part of the proposed development area.

Arboriculture

ECC welcomes that a Landscape Design Strategy is being progressed given the rural setting of the site and need to sensitively integrate the site with its wider landscape setting.

ECC would require any application to consider the potential impact of construction and operational traffic on both the use of the historic rural lanes and their associated native trees and hedging. The majority of roadside trees and hedges are likely to be boundary features within the private ownership of local landowners, and not as is generally assumed, ECC Highways, and increased traffic is likely to put an unexpected burden on landowners.

ECC welcomes reference to enhancing the existing tree planting and the potential relocation of trees on the eastern part of the site. However, the task of tree relocation is a specialist job that should only be undertaken in exceptional circumstances, and is not suitable for all trees (e.g., veteran trees) and has no guarantee of success. There is however, potential to carry out robust planting to enhance the site in the future.

ECC recommend the British Standard "Trees in Relation to Design, Demolition and Construction to Construction - Recommendations" (BS 5837) (2012) is followed in any tree survey detailing how trees are appropriately and successfully retained on site. Any proposal should also undertake an Arboricultural Impact Assessment, an Arboricultural Method Statement and provide full details of planting schemes and their future maintenance regimes.

In October 2019, ECC established the Essex Climate Action Commission (ECAC) to advise on ways to mitigate against climate-change and make recommendations to help Essex become net-zero by 2050. The ECAC has made over 130 recommendations regarding how new and existing buildings can contribute to meeting the climate agenda in its report [Net-Zero: Making Essex Carbon Neutral \(July 2021\)](#) and the [Built Environment;](#)



Land Use and Green Infrastructure; Energy; Transport; Waste Management and Community Engagement technical annexes.

ECC is still formulating its response to the recommendations to determine how best to incorporate them into a Climate Action programme of work that is appropriately funded and then delivered. ECC note the MoJ ambition in Aim 1 and 2 on page 16 of the consultation document to reduce carbon emissions by 85% compared to other prisons, for prisons to become all electric; installing energy efficient heat pumps, lighting, appliances and equipment; the use of building materials based on their low environmental impact; and the use of responsible suppliers. However, ECC would expect the MoJ to seek to provide net zero prisons over the lifetime of their development not simply when operational, particularly given the climate emergency and to help meet Government targets. ECC notes the reference on page 20 of the consultation to seeking to lower carbon emissions so any prison is as close to zero as possible, and the following opportunities, but not an exhaustive list, should be considered when progressing the design and layout of each prison:

- the maximisation of renewables onsite to meet 100% of demand;
- consideration for battery storage;
- use of solar panels;
- Implement sufficient electronic charging points for employees and visitors alike, and provide the connectivity to expand this at a future date;
- Provide for new habitat creation including woodland which achieves a minimum of 15% biodiversity net gain.
- maximises incorporation of passive design features to control heat gain and deliver passive cooling (in line with the sequential cooling hierarchy⁴⁴) without resorting to energy intensive cooling methods such as air conditioning
- consideration of smart and flexible energy systems;
- opportunities to reuse waste heat should be sought and any heat networks connections/creation;
- plans to monitor and disclose emissions to ensure they do continue to meet net zero standards;
- any residual carbon dioxide emissions should be offset through financial contribution to local carbon offset fund; and
- Consideration could be given to a single energy centre serving the entire site providing well-designed on-site communal heating resulting in significant space savings within buildings, helping to make the most efficient use of the site.

ECC acknowledges that there is a balance to be taken between modern methods of construction with standardised components and assemblies offering economies of scale and consideration given to the local landscape. It is noted that the HMP Five Wells Prison near Wellingborough is utilising 80% standardised design which will be used on subsequent prison developments. This development is located adjacent to an existing urban area as opposed to the remote location at Wethersfield located within its own natural and historic landscape issues identified above.

Braintree District Council (BDC) has recently approved its Climate Change Strategy 2021-2030 and the Initial Action Plan September 2021 – March 2023 and can be viewed via the following [committee papers](#). To ensure its effectiveness it will be closely linked with the

ECAC and subsequent ECC response and also reflect the outcomes of the Environment Bill.

In progressing future proposals ECC recommend consideration is given to the ECAC recommendations and the ECC response to those recommendations and the BDC Strategy and Action Plan.

Multi-functional Green Infrastructure (GI)

We welcome reference to Green Aim 4 (page 16) which seeks to minimise any impact on wildlife, plants and trees both within and beyond the prison fence, potential re-location of trees as appropriate and the creation of new wildlife habitats. ECC view the provision of multifunctional GI within developments and connectivity to wider GI is a key consideration at every stage in the planning and design process and consistent with NPPF, paragraph 8c (environmental protection and enhancement objective) and paragraph 98 (access to high-quality open spaces; opportunities for sport and physical activity to aid health and well-being; and helping address climate change).

ECC consider the provision of GI should be central to the design and layout of the new prisons. However, the current proposal promotes a 'sustainable and green' prison based upon the 'prevention' of developmental impact rather than identifying the additional benefit GI can bring to the scheme, the inmates and wildlife. For example, GI could be used innovatively to help with the rehabilitation of inmates and their mental health, as recently highlighted by concerns at HM Prison, Chelmsford which included concerns over poor daily regimes being implemented with inmates locked in cells for long periods of time. Enhanced GI can also provide opportunities to develop employment skills as part of any rehabilitation. The ECC Strategy Everyone's Essex includes a commitment to 'Green Growth' seeks to develop Essex as a centre for innovation, supporting new technologies and business models to enable the ECC economy to transition to net zero and secure green jobs for the future by ensuring there are the right local skills and drawing in investment opportunities.

ECC has prepared an Essex Green Infrastructure Strategy (2020) on behalf of the Essex Green Infrastructure Partnership in 2020 (including BDC). Section 5.1 provides examples of this multi-functionality, including recreational and active living supporting healthy lifestyles (both physical and mental well-being); green travel routes; habitat provision involving the conservation and enhancement of biodiversity; heritage and cultural assets providing landscape, place quality and amenity; food production and productive landscapes; pollution absorption and removal; flood attenuation and water resource management; and access to nature. The proposal should consider all these initiatives as a minimum.

Whilst there are no statutory requirements for GI, the 25 Year Environment Plan and emerging Environment Bill will place significant importance on protecting and enhancing GI, its accessibility and biodiversity net gain.

ECC has recently consulted upon the Essex GI Standards Framework and Guidance that has been developed to support policy and decision making in the planning and delivery of GI. The consultation can be accessed by the following link - <https://consultations.essex.gov.uk/rci/essex-gi-standards/>. These Essex standards have 9 Principles of Good GI, as well as identifying target measures and indicators to achieve quality and consistency in the provision, management and stewardship of GI as an



essential part of place-making and place-keeping for the benefit of people and wildlife. This includes supporting standards, such as Building with Nature, Livewell Development Accreditation, Accessible Natural Greenspace Standard.

The proposals state that the new prisons will be different to existing prisons and will impact positively on local landscape through their design and operation. ECC recommend the proposal applies the Building with Nature standards to achieve an accreditation of 'good' at each stage of the green infrastructure lifecycle to strengthen the prison's credibility and to demonstrate that the prison goes beyond the statutory minima, to being sustainable and green. The Building with Nature Standards and process can be viewed [here](#).

ECC recommend the following are considered as part of any future application with regards GI and welcome further discussion through the pre-application and PPA process.

Any proposals should consider relevant sections in the [Sustainable Drainage Systems Design Guide for Essex](#), [Essex Design Guide](#) and relevant policies in the Braintree Local Plan policies and equivalent green and open space strategies regarding the approach to green infrastructure provision in the local authority area. ECC would seek clarification with regards those existing green spaces and GI which are to be retained and where new green space will be created in order to maximise the provision of GI, including initiatives such as green roofs or nature-based courtyards.

Any planning application will need to be accompanied by a number of policy and evidence supporting documents, which will need to reference GI matters. As the scheme progresses other necessary policy, evidence and study documents will be identified in addition to those outlined below.

- Environment Impact Assessment (EIA) – the EIA (Landscape and Visual Impact section) should be informed by a comprehensive audit of the existing GI assets to demonstrate the multifunctionality of GI and its connectivity to the wider landscape and neighbouring communities. Measures to improve gaps in the existing GI provision, avoidance or reduction of significant adverse effects on the functionality of existing GI assets (irrespective of scale) and assist in the identification of measures for compensating/off-setting unavoidable significant adverse effects on GI assets to protect the overall integrity of the surrounding GI network (including any nearby designated sites of importance).
- GI Strategy – to be prepared based on the GI Standards identified in the Essex GI Strategy Standards Framework (see above). An assessment of the site's ecological context should be submitted to and approved in writing by a landscape specialist from the local planning authority. Any GI Strategy should outline how the scheme is to be designed to deliver biodiversity net gain (including the net gain biodiversity calculation for the site), in accordance with NPPF (2021), paragraph 179b. The Strategy should identify wider environmental net gains as part of the necessary nature recovery networks and the wider landscape GI network. Any Strategy will need to demonstrate the site and its setting has been reviewed for multiple functions and benefits (listed in the Essex GI Strategy (chapter 5.1, page 35) and ensure that green spaces are designed to ensure multi- purpose and functional use, whether contributing to the benefit of existing communities or for educational and wellbeing for inmates (GI covers potential for learning employable skills).

- Biodiversity Enhancement Strategy – to demonstrate measurable net gains for biodiversity in accordance with NPPF(2021), paragraph 179b and conditioned as part of any planning application;
- Design and Access Statement – reference should be made to GI and landscape matters where appropriate. Strategic elements of the GI framework should be brought forward in the early phases of development in order that substantive GI is secured as early as possible to allow its early establishment;
- Construction Environmental Management Plan (CEMP) – to set out how retained GI, such as trees, hedges and vegetation, as well as any nature designated sites (e.g., SSSI's etc.) will be protected during the construction phase. It should enable the phased implementation of new GI to allow for it to mature and provide natural buffering from the construction work; and
- Landscape Ecological Management and Maintenance Plan – to outline a work schedule for a minimum of 10 years including who is responsible for the maintenance, funding and management of GI assets (including any surface water drainage system) for the lifetime of the development. This will ensure appropriate mechanisms are put in place to maintain high-quality value and benefits of the GI assets and should be agreed prior to commencement of works

In October 2019, ECC established the Essex Forest Initiative and committed to plant £1million worth of trees (some 375,000 trees) to assist with climate change, biodiversity and flood management. All Essex local councils have set separate targets which add up to a current total target of 870,000 trees. This initiative is consistent with the aim on page 16 of seeking to create new habitats for wildlife so that local wildlife benefits from the building overall. The Essex Forest Initiative would be keen to be involved in any tree planting plans regarding the scheme if it progresses to a planning application. Any tree planting should also consider other nearby initiatives, such as the Ground Control Wildfell site, which is less than one kilometre from the current airfield, in order to consider connectivity of these habitats.

Surface Water Management

ECC welcomes the reference to Green Aim 3 (page 16) to the use of Sustainable Urban Drainage Systems to manage the flow of surface water and commitment to undertake a full Flood Risk Assessment (FRA) on page 23. The layout and design of the scheme should take into account an integrated approach to water management. ECC would seek early pre-application discussion as the LLFA on the scope of the FRA.

ECC updated the Sustainable Drainage Systems Design Guide for Essex in 2020. ECC has also outlined what it would expect to see, as Lead Local Flood Authority (LLFA), within any FRA at various stages of development and can be viewed via What We Expect To See | Essex Design Guide. With any stage of the application, the LLFA would expect submission of all relevant documents from the previous stages. This would help give a full overview of the history of the application and will help the review process. Large strategic sites may also require drainage information to be provided as part of the master planning process. Chapter 7 of the 'Ciria SuDS Manual C753' provides a conceptual guide for the overall SuDS design process and of the implementation of SuDS during master planning. This includes an integrated series of features across the site to help contribute towards

storage requirements as well as meeting water quality and amenity benefits. Provision of central rainwater harvesting system would be given consideration and early engagement with LLFA is recommended.

The scale and purpose of a prison development is different in nature to other development and to which the source control features could be designed onsite. For example, ECC seeks to provide SuDS options that are multifunctional in nature providing additional health and wellbeing benefits. Whilst these could be provided for the benefit for inmates their full benefit to the community will not be maximised. However, the amount of hard standing areas and building footprint should be minimised on-site and wherever possible permeable paving be considered. Any SuDS should include the provision of green roofs and rain gardens within the main prison building. Consideration should be given to providing central rainwater harvesting systems to deliver some of the prison's water requirements and promote the efficient use of water.

It is recommended that the landscape outside of the Prison building itself offers potential opportunities to deliver attractive and multifunctional space, including biodiversity enhancements. The outside landscape within the site may include areas such as visitor car parks, footpaths, sports pitches, walking and cycling routes. Such features can be constructed to be permeable in nature and located alongside green landscape features delivering wider benefits in terms of flood management and runoff treatment, and which could link into any green corridors beyond the prison perimeter. SuDS features are required to provide appropriate storage to meet allowable discharge rates from the site. Given potential site constraints, it may be necessary to provide above ground SuDS features beyond the prison perimeter, in order to maximise their multifunctional purpose and providing a pleasant and healthy environment for visitors and the local community.

Employment and Skills

Everyone's Essex sets out the following economic related commitments of ECC to 2025:

- to create a strong, inclusive and sustainable economy including creating 'good jobs' enabling people to build their skills;
- delivering and maintaining high quality 'infrastructure' to support a growing economy;
- creating the conditions for growth and maximising the impact of public sector investment; developing green growth; and
- through levelling up the economy by addressing the drivers of socio-economic inequality. Further details can be viewed [here](#).

ECC welcomes the potential community benefits identified on page 22 based upon other recent prison developments including:

- the creation of between 1200 – 1400 permanent jobs with local people able to apply;
- creation of hundreds of jobs for the community during the construction phase (including apprenticeships and work placements); and



- a commitment to ensure that at least 25% of the workforce are employed locally and 25% of the project spend is spent locally.

ECC consider that the percentages for local jobs (25%) should be regarded as a minimum and could be higher through early engagement with appropriate partners enabling the upskilling and employment opportunities for local residents. The example KPI targets and actual performance data from the Glen Parva prison is encouraging on this matter. ECC is keen to be involved in this process if the scheme progresses.

ECC is involved in the Essex Anchor Institutions Programme alongside other organisations including hospitals, local government (districts, boroughs, city), universities, further education organisations, voluntary sector, County Council and Integrated Care System (ICS)/Clinical Commissioning Group (CCG)/NHS. There is no reason why the Prison Service could not be incorporated into this process.

ECC is seeking to connect, support and enable anchor organisations' who will be significant players in the economic recovery of Essex in their role as investors, purchasers and employers. Many are tied to place and embedded in their communities.

Anchor Institutions have several levers available to them which they can influence to help shape the local area including:

1. Workforce developer – shaping and developing the skills of the local workforce.
2. Employer –employing locally and improving the wellbeing of their employees.
3. Local business incubators – supporting SMEs to encourage growth and innovation within them.
4. Procurement of goods and services – increasing social value through procurement.
5. Estates and environment – ensuring estates include community, health and environmental benefits.

Further guidance on anchor institutions can be viewed via the [Future of Essex – Essex Partnership delivering a shared vision for change](#) website.

ECC would also expect any proposal to prepare an Employment and Skills Plan (ESP) as outlined in the Developers' Guide, section 5.4 and for them to be secured via S106 agreements. These ESPs will help with a steer on how best to invest in apprenticeships/traineeships; key skills gaps and growth sectors; and general access to skills training.

ESP's should be created by the applicant prior to implementation and must include a series of key performance indicators for both the development phases and, in the case of commercial sites, for the end-use phases. Where developers are already bringing about activity, these may contribute towards meeting the agreed ESP performance indicators. The ESP is expected to include key performance indicators and developments are expected to meet the minimum benchmarks, which are pursuant to the National Construction Skills Academy model adopted by the industry and outlined in 'Appendix L: Employment and Skills' of the Guide. Any ESP should set out the job roles expected to be generated during the construction phase including opportunities for apprenticeships, traineeships and workplace targets. It would provide a good opportunity to promote prison careers (prison officers; probation officers and prison instructor roles) to the local workforce and colleges to identify future career paths and their links with local college courses etc.



In general terms these roles can provide average salaries of approximately £30,000 per annum depending on training and grade. The ESP should also identify potential requirements into associated professions with the development including nurses, teachers and office staff etc. The ESP should also identify whether the scale of new roles generated by the development impacts on the need for the provision of local training then a developer contribution is likely to be sought to fund any support training capacity.

The following ECC and SELEP policy and strategy documents are provided for information to assist with the preparation of any ESP:

- Prosperity and Productivity Plan - this Plan sets out our framework for an economy in which productive businesses create high-value, sustainable jobs and in which everyone benefits from growth. It investigates the next 20 years and sets out priorities for the next five.
- Skills for Growth Strategy - the strategic context for the strategy is to set out the priorities and strategy for Essex in response to the National Industrial Strategy. It includes a Skills for Growth Action Plan (Pg. 12 – 13) An updated Skills Strategy Action Plan will be published which will provide a guide for future investment (date of publication still to be confirmed).
- Economic Recovery and Renewal Strategy (March 2021) - this strategy sets out working arrangements with partners (including ECC and MDC) to support a path to recovery and renewal in the short to medium term. It outlines the opportunities and needs of the SELEP area and the actions that we will take to drive the South East into new economic growth as the country recovers from the COVID-19 pandemic and establishes new ways of working internationally following the EU Transition.

Once again thank you for consulting ECC at this very early stage, please contact either [REDACTED] the case officer or me if you require further information or would like to discuss this response in more detail.

Yours sincerely,

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Head of Planning and Sustainable Development

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