

17th March 2023

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Planning Response Unit
Department for Levelling Up, Housing and
Communities
By Email

Dear ██████████

MDPGA Wethersfield EIA Screening Request

We write on behalf of the Home Office (the 'Applicant') to formally request a Screening Direction under Regulation 5 (6) of the Town and Country Planning (Environmental Impact Assessment) Regulations 2017 (as amended) (herein referred to as 'the EIA Regulations') from the Secretary of State in relation to the repurposing of the former Royal Air Force (RAF) Wethersfield to provide temporary accommodation for asylum seekers at Wethersfield, Braintree, Essex (hereafter referred to as the Proposed Development).

In line with the requirements of Regulation 6 (2) of the EIA Regulations, this screening request presents the following information to assist the Secretary of State in adopting an EIA Screening Direction for the Proposed Development:

- A plan sufficient to identify the land (Figure 1 in Appendix A);
- A description of the nature and purpose of the Proposed Development; and
- A description of the aspects of the environment likely to be significantly affected by the Proposed Development and the likely significant effects, taking into account:
 - a. Schedules 2 and 3 of the EIA Regulations;
 - b. The characteristics of the Proposed Development; and
 - c. The location of the Proposed Development and its surrounds.

The Government EIA Screening Checklist has been completed and this is provided in Appendix B.

1. Baseline

- 1.1 The Site comprises part of the existing Ministry of Defence Police and Guarding Agency (MDPGA) Wethersfield headquarters and training centre for the Ministry of Defence Police (MDP) (referred to hereafter as the Site), located in Wethersfield, Braintree, Essex. The Site is situated on the former RAF Station Wethersfield, used by the RAF, United States Army Air Force (USAAF) and the United States Air Force (USAF) between the 1950s and 1980s.
- 1.2 The boundary of the Site is centred on National Grid Reference TL714329. The Site location and boundary is illustrated in Figure 1 in Appendix A, and the environmental context of the area surrounding the Site is illustrated in Figure 2 in Appendix A.
- 1.3 The Site consists of two main areas:
 - **Main Camp:** The area of the Main Camp consists of approximately 3.32 hectares (ha) comprising six barrack blocks and a further two blocks currently fitted as offices.
 - **Hardstanding area:** The area to the east of Main Camp comprises hardstanding and some green areas at an approximate area of 3.18 ha in total.

- 1.4 The Site totals an area of approximately 6.5 ha and is located within the Three Fields Ward of Braintree District Council (BDC) within Essex County Council (ECC).
- 1.5 The Main Camp area of the Site is abutted to the south, by 21 Service Family Accommodation (SFA) houses which are still occupied by UK service families. The SFA houses are due to be fully vacated by 31st July 2023.
- 1.6 All MOD users are due to fully vacate the wider facilities by 2025, although the current users (MOD Police particularly) are not utilising the vast majority of the wider facility. The Ministry of Justice are planning to construct two large prisons, one Category B and one Category C housing c.3,400 prisoners, on the western side of the Site.
- 1.7 The Site is assumed to be vacant and as a worst case assessment the population baseline of the Site and traffic numbers associated with the Site are assumed to be zero.
- 1.8 The Site is brownfield and visually open, with greenfield land extending beyond the wider facility in all directions. The Site is bounded to the north-east by the former RAF airfield, approximately 10 ha in area, comprising former runways and taxiways. The B1053 runs approximately 1.4 kilometres (km) to the west, connecting the Site to the village of Wethersfield which lies approximately 1.4 km to the south-west.
- 1.9 The Site is located within the South Suffolk and North Essex Clay and (NE515) National Character Area (NCA), with the Bovingdon Hall Woods Site of Special Scientific Interest (SSSI) situated approximately 5 km southeast of the Site. There are four non-statutorily designated ancient woodlands identified within 2 km of the Site, ranging approximately 320 m to 1.3 km from the Site.
- 1.10 The Site is located within Source Protection Zone (SPZ) 3 (Total Catchment), defined as having a fairly low risk of groundwater contamination associated with minor groundworks owing to the long travel time (greater than 400 days) between the Site and the nearest groundwater abstraction point.
- 1.11 There are four Grade II listed buildings within 1 km of the Site, the closest being Sculpin's Farmhouse, approximately 225 m northwest of the Site. Wethersfield Conservation Area is approximately 1.6 km southwest of the Site. There are no World Heritage Sites, Scheduled Monuments, Registered Park and Gardens or Registered Battlefields within close proximity of the Site.
- 1.12 The nearest residential settlements to the Site is the village of Wethersfield, approximately 1.0 km to the south and the village of Finchingfield, approximately 3.0km the west. The statistical geographies selected for socio-economic assessment are Wethersfield Parish (GSS code E04003935) and Finchingfield Parish (GSS code E04003897). These geographies are selected as appropriate to use because (i) they provide the granular results for Wethersfield and Finchingfield alone rather than the wider ranging geography of output areas, or lower/middle level super output areas and (ii) provide a comprehensive range of Census 2011 data that is published and available as Local Area Reports¹. Census 2021 data is not yet available at these geographic levels or for the detailed characteristics that enable a robust socio-economic assessment.
- 1.13 The combined usual resident population of Wethersfield and Finchingfield parishes is 2,740 residents in 1,173 dwellings. The population of the parishes is relatively older – over 27 percent of residents are over the age of 60 years. The male/female population is approximately 50:50. The population is largely of White British ethnicity – almost 97 percent. Most households are in homes that are owned either outright or with a mortgage – almost 70 percent. The Census counts include as residents those in Service Family Accommodation (SFA) within the RAF Station Wethersfield.
- 1.14 As aforementioned there are 21 houses located within the SFA. It is likely they are occupied with between 2-4 people, which equates to between 42-84 residents.
- 1.15 Key amenities and community facilities in Wethersfield include: Wethersfield Fire Station, Wethersfield Village Hall, Wethersfield Recreation Ground and Playground, Wethersfield Post Office, and Wethersfield CE Primary School, all of which are within 2 km of the Proposed Development. There is also some holiday accommodation properties in Wethersfield. Key amenities and community facilities in Finchingfield include

¹ NOMIS Wethersfield Parish Local Area Report available at <https://www.nomisweb.co.uk/reports/localarea?compare=E04003935>. NOMIS Finchingfield Parish available at <https://www.nomisweb.co.uk/reports/localarea?compare=E04003897>

Finchingfield Post Office and Stores, Finchingfield CE Primary School, and public houses, which are within approximately 3 km of the Proposed Development.

- 1.16 The nearest GP surgery offering primary healthcare is Freshwell Health Centre in Finchingfield, approximately 2.5 km west of the Proposed Development. The nearest hospitals are Halstead Hospital and Braintree Community Hospital, the latter of which offers Accident and Emergency services; both are approximately 10 km from the Proposed Development. It is likely that existing residents access additional healthcare facilities, social infrastructure, and amenities to those outlined above, within the larger settlements of Braintree, Halstead, and Haverhill.
- 1.17 It is understood that once operational, the Proposed Development is expected to have capacity for up to 1,700 service users. The elements of the Site applicable to the Proposed Development are currently not in residential use. The Proposed Development, if fully developed, would therefore introduce an additional population which represents a substantial increase upon the existing populations of Wethersfield and Finchingfield (1,700, as a 62 percent increase on 2,740 existing residents). A population increase of this size could generate significant demand for local services and amenities, including local health services and open spaces. This is likely to include additional needs upon social infrastructure in the surrounding area. This may be mitigated with increased provision of services to meet the increase in need, including the provision of healthcare which will be managed by the Integrated Care board (ICB) and will be fully integrated for the entirety of the first year of operation to meet the needs of the service user population. The Proposed Development may affect the demographic structure of the parishes – assuming that the service users are more likely to be male, and younger and of more diverse ethnicities than the existing resident population.
- 1.18 Each technical assessment within the Screening Checklist in Appendix B includes a more detailed baseline description applicable to that topic. The characteristics and duration of the Proposed Development and the Site have been considered when assessing the environmental aspects likely to be affected and the potential for likely significant effects to result from the Proposed Development.
- 1.19 The following sources of data have been utilised in the establishment of the baseline:
 - Defra's MagicMaps²;
 - Extrium's Noise and Air Quality Viewer³;
 - Braintree District Council (BDC)'s Air Quality Annual Status Report⁴;
 - Office for National Statistics^{5,6}
 - UK Air Quality Strategy⁷;
 - UK Climate Projections 2018⁸;
 - British Geological Survey (BGS)'s Geology Viewer⁹;
 - Environment Agency (EA)'s Aquifer Designation Map¹⁰;
 - EA's Groundwater Vulnerability Map¹¹;

² DEFRA, (2022); Magic Maps. Available at: <https://magic.defra.gov.uk/MagicMap.aspx>

³ Extrium. 2023. *England Noise and Air Quality Viewer*. [Accessed 21 February 2023]. Available from: <http://www.extrium.co.uk/noiseviewer.html#>

⁴ Braintree District Council. 2022. *2022 Air Quality Annual Status Report*. Available from: https://www.braintree.gov.uk/downloads/file/3583/dp20_ids_mandate

⁵ The Wethersfield Built-up area (GSS code E34002503) defined by Office for National Statistics at time of publication of Census 2011.

⁶ Office for National Statistics, (2012); Census 2011.

⁷ Department for Environment, Food and Rural Affairs (2007). *The Air Quality Strategy for England, Scotland, Wales and Northern Ireland*.

⁸ Met Office, UK Climate Impacts Programme, British Atmospheric Data Centre, University of East Anglia, Newcastle University [online]. Available at: <http://ukclimateprojections.metoffice.gov.uk/>

⁹ British Geological Survey, 2022. *Geology of Britain viewer*. Available: <http://mapapps.bgs.ac.uk/geologyofbritain/home.html>. Last checked 25/04/2022.

¹⁰ Data.go.uk, open source data. Available at <https://www.data.gov.uk/dataset/ca01077c-5dce-40c9-9c38-74c936b7f075/aquifer-vulnerability-maps-england-and-wales>

¹¹ Data.go.uk, open source data. Available at <https://www.data.gov.uk/dataset/42d7d021-538c-46e2-abb6-644e01c63551/groundwater-vulnerability-maps-2017-on-magic>

- Publicly available landfill data¹²;
- Civil and Structural Engineering Appraisal¹³;
- Natural England (NE)'s National Character Areas¹⁴;
- Ministry of Justice Site Reports¹⁵
- BDC'S Landscape Character Areas¹⁶;
- BDC'S Listed Buildings, Conservation Areas and Article 4 Directions¹⁷;
- Heritage Gateway's Historic Environment Record (HER)¹⁸;
- Essex County Council (ECC)'s Minerals Local Plan (MLP)¹⁹;
- ECC's Waste Local Plan (WLP)²⁰;
- UK National Risk Register²¹;
- BDC's online planning portal²²;
- British Standard (BS) 5228²³; and
- British Standard 5906:2005²⁴.

2. The Proposed Development

- 2.1 The Home Office is seeking temporary permission for change of use of existing buildings at Wethersfield for the purpose of the processing of non-detained asylum seekers (migrants) and the provision of temporary residential accommodation with communal services, for a maximum period of 180 days for each service user (hereafter referred to as the 'Proposed Development'). Subject to the outcome of the EIA screening process, it is expected that the Proposed Development will be completed pursuant to permitted development rights under the General Permitted Development Order (GDPO) (Part 19 Class Q of the General Permitted Development Order 2015, as amended). The Proposed Development is expected to be operational for a temporary period of 12 months in total.
- 2.2 The Home Office has a statutory obligation to provide eligible asylum seekers with accommodation and subsistence support whilst their application for asylum is being considered. This is in accordance with the Immigration and Asylum Act 1999, the Asylum Support Regulations 2000, the Asylum Seekers (Reception Conditions) Regulations 2005, the Nationality, Immigration and Asylum Act 2002 and the Immigration Act 2016.
- 2.3 The asylum system has faced significant pressures and it has become necessary to source, and use, additional temporary accommodation (sometimes referred to as contingency accommodation), such as

¹² Data.gov.uk, open source data. Available at: <https://data.gov.uk/data/map-preview?e=2.072&n=55.816&s=49.943&url=http%3A%2F%2Fenvironment.data.gov.uk%2Fds%2Fwms%3FSERVICE%3DWM%26INTERFACE%3DENvironment--7a955570-d465-11e4-a37c-f0def148f590%26request%3DGetCapabilities&w=-6.236>.

¹³ Civil Engineers (2023) Civil and Structural Engineering Appraisal

¹⁴ Natural England. 2014. *Map: National Character Areas*. Available from: <http://publications.naturalengland.org.uk/map?category=587130> [accessed March 2023]

¹⁵ Ministry of Justice Site Reports - various

¹⁶ BDC. 2006. *Landscape Character of Braintree District*. Available from: <https://www.braintree.gov.uk/downloads/file/2405/e40-landscape-character-assessment-section-3-landscape-character-of-braintree-district-september-2006>

¹⁷ BDC. 2023. *Listed Buildings, Conservation Areas and Article 4 Directions*. Available from: <https://braintree.maps.arcgis.com/apps/webappviewer/index.html?id=83db4230bb5046e6bca72169e40b3266> [accessed March 2023]

¹⁸ Heritage Gateway <https://www.heritagegateway.org.uk/Gateway/> [Accessed March 2023]

¹⁹ ECC, 2014. *Essex Minerals Local Plan 2014*. Available from <https://assets.ctfassets.net/knkzaf64jx5x/5UZuVtnjZbJ81oVZoZKvX/90acfc65df6fa8ee8ab20df3f0cda1c8/essex-minerals-local-plan-adopted-july-2014.pdf>

²⁰ ECC, 2017. *Essex and Southend-on-Sea Waste Local Plan 2017*. Available at <https://assets.ctfassets.net/knkzaf64jx5x/5MMZ5nNFmOCIPF56igb0Jc/e6f7ab4cba4ed1198c67b87be7b375e7/waste-local-plan-2017-compressed.pdf>

²¹ UK Cabinet Office, (2020). National Risk Register 2020. Available at: https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/952959/6.6920_CO_CCS_s_National_Risk_Register_2020_11-1-21-FINAL.pdf

²² BDC, 2022. *View or comment on planning applications*. Available at <https://www.braintree.gov.uk/planning-building-control/view-comment-planning-applications> [Accessed March 2023]

²³ BS 5228 -1:2009 Code of practice for noise and vibration control on construction and open sites – Part: Noise

²⁴ British Standard 5906:2005 Waste Management in Buildings – Code of Practice.

hotels and more recently former military sites and other sites, to ensure the Home Office can continue to meet its statutory obligations towards destitute asylum seekers.

- 2.4 Asylum seekers in temporary accommodation are not detained and are free to come and go as they please. They are subject to the same laws and protections as any other member of the public.
- 2.5 As such, the Home Office is seeking temporary permission for change of use of existing buildings at the Site for the purpose of the processing of non-detained asylum seekers (migrants) and the provision of temporary residential accommodation with communal services, for a maximum period of 6 months for each service user. Subject to the outcome of the EIA screening process, it is expected that the Proposed Development will be completed pursuant to permitted development rights under the General Permitted Development Order (GDPO) (Part 19 Class Q of the General Permitted Development Order 2015, as amended). The Proposed Development is expected to be operational for a temporary period of 12 months in total.

Service Users

- 2.6 Migrants will mainly be arriving to the UK from Channel crossings to the Kent coast or relocated from existing hotel accommodation. They will predominantly be intercepted and transported from either Dover or Ramsgate after being processed at Manston or another port of entry.
- 2.7 The non-detained Accommodation Centre facility will be available all year-round and is expected to have a capacity of approximately 1,700 service users. The numbers will be seasonal and weather dependent with higher numbers in fair weather during the summer months, although, it is anticipated an average of 50 - 100 asylum seekers could be processed each day (single movements). The movement of these people would be accommodated by 2-3 vehicular coach trips to and from the Site per day. However, overall transferrals will be limited to the Site's capacity.
- 2.8 Service users housed at this Site will be single adult males – no families will be permitted. Asylum seekers will be screened for both health and vulnerability prior to being transported to the Site. Users will be entitled to monetary allowance through the Asylum Support Payment.
- 2.9 The facility will predominately serve as a residential facility to support asylum applicants who are destitute and require accommodation. The asylum seekers will have very little capacity to spend on local services.
- 2.10 The Site will be managed by an experienced Service Operator, contracted by the Home Office, who will retain overall responsibility for the Site. Migrants will not be detained but will be subject to a voluntary 10pm curfew. A 24-hour security presence will be provided on Site by a third-party service provider which will be adequate to protect the safety and security interests of asylum seekers, staff and visitors to the Site.

Installation of Modular Accommodation and Refurbishment

- 2.11 The Proposed Development comprises internal refurbishment of existing accommodation to ensure statutory compliance together with the installation of modular buildings. The works will be split into three phases (as shown on the phasing plan):
- **Phase 1:** the works as part of Phase 1, as detailed below, will provide a total of c.331 beds:
 - Two of the barrack blocks on the Main Camp (parcel A1) will be refurbished and converted into asylum accommodation for circa 223 people.
 - Approximately 108 beds comprising modular units will be situated on the hardstanding areas making up parcel B.
 - **Phase 2:** the works as part of Phase 2, as detailed below, will be similar to the works proposed in Phase 1 and will provide a total of c.448 beds:
 - Two of the barrack blocks on the Main Camp (parcel A2) will be refurbished and converted into asylum accommodation for circa 300 people on or shortly after 30th April 2023.
 - Approximately 148 beds comprising modular units will be situated on the hardstanding areas making up parcel B on or shortly after 31st May 2023.

- **Phase 3:** refurbishment of existing blocks on parcels C and D of Main Camp to provide circa 921 beds :
 - Two of the barrack blocks on the Main Camp (parcel C) will be refurbished and converted into asylum accommodation for circa 362 people.
 - Two blocks fitted as 3-storey offices on the Main Camp (parcel D) will be converted to asylum accommodation standard to provide a further circa 339 beds.
 - Approximately 220 beds comprising modular units will be situated on the hardstanding areas making up parcel B.
- 2.12 Renovation of the existing barrack blocks will require minimal superficial work as the blocks are already compliant with statutory asylum standards, such as a connection to utilities, and are installed with furniture. Modular accommodation on areas of existing hardstanding will take longer to install as minor groundworks will be required to provide utility connections to existing utilities.
- 2.13 No construction (modular buildings are anticipated to be brought in pre-fabricated), engineering works, or vegetation clearance is required. Only minor breaking of ground will be required to allow for utilities connections to the new modular units. No demolition is expected to be undertaken. Any existing facilities which are not proposed to be used will be made secure and fenced off.
- 2.14 The exact specification of the modular units is to be determined, however a 6 bed modular unit will be approximately 12 m by 4 m, and approximately 3.2 m tall.
- 2.15 The existing barrack blocks currently accommodate one person per room but the intention is to increase this capacity to house two people per room. The modular units will have larger rooms with a greater capacity to house more people – these will be designed to house up to six service users per room. Additional modular shower blocks will be provided adjacent to the existing barrack blocks. These will be compliant with UK Building Regulations and will likely comprise additional shower and toilet facilities with water mains connected directly to the existing blocks via the current sewerage system.
- 2.16 The proposed works will total six months in duration with an average of two blocks available for accommodation per month. The intention is to immediately open an initial two blocks of existing accommodation to service users, with phased rollout of the other existing blocks until Site capacity is reached through both the existing blocks and modular accommodation. Since new blocks will be opening every month, works will be ongoing whilst service users are housed on the Site.
- 2.17 It is expected that working hours to enable the refurbishment works and installation of modular units on the Site will be in accordance with the standard construction working hours, Monday to Friday 8am – 6pm, Saturdays 8am – 1pm with no working on Sundays or Bank Holidays.

Provision of communal services

- 2.18 The facilities provided will be sufficient to accommodate for all of the asylum seekers on Site. The following services will be provided on Site from day one:
- Indoor and outdoor recreation facilities;
 - Dining facilities;
 - Laundry;
 - Retail; and
 - Pastoral care
- 2.19 With regards to Healthcare, the provision will be managed by the ICB and will be fully integrated and available on day one. This could be a combination of both on-site and off-site provision. The demand for health provision will be monitored, with provision increased, if required to ensure that there are no significant effects upon local healthcare infrastructure.

Traffic, transport and access

- 2.20 The Site will be accessed using the existing network of internal roads accessed via Sculpins Lane to the west, which forms a junction with the B1053 circa. 1 km to the west of the Site.

- 2.21 Construction traffic in the form of HGVs to transport the modular units to site and construction staff workers are expected to be in the region of 10 HGVs a day (20 one way trips) and between 30 and 50 construction workers per day (worst case this would equate to 100 one way trips per day).
- 2.22 Car parking will be provided on Site on areas previously used for car parking or other suitable hard standing areas.
- 2.23 A regular shuttle bus service to Braintree will be provided for the service users at an initial frequency of twice per day which will increase in frequency as the population of the Site increases up to a maximum of two per hour (48 single trips between the hours of 8am and 8pm).
- 2.24 Coaches or minibuses moving service users in and out of the temporary accommodation will run around 2-3 times a day (2-3 times arriving and 2-3 times departing from the Site).
- 2.25 Its estimated that during the operational phase, approximately 5 delivery and servicing vehicles would need to access the Site per day (10 one way trips).
- 2.26 The facility will provide employment for staff, the number of which could fluctuate dependent on levels of occupation. There are estimated to be approximately 70 staff on Site each day (maximum 140 trips per day). It is expected that staff will mainly travel to work via private car or by shuttle bus from Braintree or other towns in the surrounding area.
- 2.27 Therefore overall, during the operational phase it is estimated that there would be approximately 204 one way trips per day. An Operational Transport Management Plan must be undertaken and enforced during this period in order to mitigate against adverse traffic effects. This should include measures (but not limited to) such as:
- measures to manage car use;
 - measures to manage travel demand and alter travel behaviour;
 - measures to encourage public transport use; and
 - measures to encourage cycling.

Utilities, Energy and Waste

- 2.28 Extant buildings will continue to be serviced by existing utilities and the modular accommodation will need to be connected to existing utilities. The demand created by the additional accommodation will be met through off site provision, subject to consultation with the relevant utilities companies. Where existing water pipes / conduits cannot be reused new pipework will be laid above ground to avoid disturbance and ground works.
- 2.29 Existing CCTV access points will be reused – there are no plans to install CCTV towers above the roof lines.
- 2.30 There is an existing central heating system on Site but this will be removed due to a broken pipe in the system. Temporary boilers will be installed to serve each of the barrack blocks until the new central heating system is installed.
- 2.31 Lighting that is part of the existing facility is expected to be used. To ensure existing wildlife corridors around and within the Site are maintained any additional lighting required in the vicinity of the modular units and existing barracks buildings will be well designed to an appropriate specification and directional so as not to impact the surrounding environment. It is proposed that operational lighting in external areas is developed to incorporate the below to avoid adverse impacts on wildlife and nuisance arising from lighting:
- Use of warm lighting (2,700k or less); and
 - Use of downward facing lighting with asymmetric beams, shielded from spill.
- 2.32 Waste during the operational phase will be managed by an Operational Waste Management Plan. The Plan will mitigate against any adverse waste effects during the operational phase. This will include mitigation measures such as:
- Waste storage locations;

- residential refuse and recycling measures;
- measures to store bulky waste;
- non-residential waste storage requirements;
- waste segregation measures;
- internal waste transfer measures;
- waste collection strategy; and
- waste mitigation measures.

Legislative Requirements

- 2.33 The facility will comply with the Immigration and Asylum Act 1999 which read with the Directive 2103/9/EC sets out minimum standards for the reception of asylum seekers (“the RCD”), The Human Rights Act 1998, Building Regulations 2010, Regulatory Reform (Fire Safety) Order 2005, Electricity at Work Regulations 1989, Section 326 of Housing Act 1985, Health and safety and Work Act 1974, Water Supply (Water Quality) Regulations (England and Wales) 2016 and Water Supply (Water Fittings) Regulations 1999.
- 2.34 Legally, the Applicant must comply with the following:
- Be legally responsible for residents of the facility, including health (including mental health), the control of infectious diseases and provision of services.
 - Oblige with inspection by any independent body, e.g. His Majesty’s Inspectorate of Prisons
 - Comply with Building standards²⁵.
 - Comply with standards set out within the Housing Act²⁶.
 - The facilities are subject to inspection by the Crown Premises Fire Safety Inspectorate and the Applicant would have to act on their recommendations.
 - Waste storage, transportation and disposal will be subject to the relevant legislation, including the Environmental Protection Act 1990²⁷ and the Environmental Protection Regulations²⁸ (Duty of Care) Regulations 1991 including in relation to waste arising from health care provision.
 - They Applicant must comply with the Wildlife and Countryside Act²⁹ 1981 and the Conservation of Habitats and Species Regulations³⁰ 2017 (as amended).

Mitigation measures

- 2.35 The following operational management plans and assessments will be provided to DLUHC and will be implemented:
- Community Impact and Insite Assessment;
 - Operational Transport Management Plan;
 - Operational Site Management Plan (facility management plan);
 - Operational Waste Management Plan

3. Consultation and Engagement

- 3.1 Formal engagement with local stakeholders regarding the Proposed Development has not yet been undertaken. At present, Minister Jenrick has met in-confidence with the local MP to inform them of the

²⁵ DHULC, Building Regulations (2020). <https://www.gov.uk/guidance/building-regulations-and-approved-documents-index> .

²⁶ HMRC, The Housing Act (2004) <https://www.legislation.gov.uk/ukpga/2004/34/contents>

²⁷ HMRC. Environmental Protection Act (1990). <https://www.legislation.gov.uk/ukpga/1990/43/contents>

²⁸ HMRC. Environmental Protection (Duty of Care) Regulations (1991). <https://www.legislation.gov.uk/uksi/1991/2839/made>

²⁹ HMRC. Wildlife and Countryside Act (1981). <https://www.legislation.gov.uk/ukpga/1981/69>

³⁰ HMRC. The Conservation of Habitats and Species Regulations (2017). <https://www.legislation.gov.uk/uksi/2017/1012/contents/made>

Home Office proposals for use of the Site. A senior Official has also met with the chief executive from BDC for an in-confidence discussion.

- 3.2 In-confidence conversations have been held with Natural England, regarding Habitats Regulations Assessment (HRA) and in accordance with Regulation 76 of the Conservation of Habitats and Species Regulations 2017 an HRA Screening request has been submitted to Natural England. The response from Natural England has been received and confirms no likely significant effect (i.e. no 'relevant effects') will arise on European sites.
- 3.3 Engagement is ongoing with DHSC, UKHSA & NHS England to confirm solutions for the Site. In terms of "day one" provisions this will be a fully integrated provision and could be provided either on or off site or both.
- 3.4 Currently there is no evidence to suggest the use of the Proposed Development may give rise to problems in respect to crime, anti-social behaviour and public safety. However, the Home Office recognise that there are local concerns and will work closely with local police and community cohesion teams to minimise the risk of any negative behaviours and create strategies to handle behaviours, if this should occur. The Police have confirmed they are ready to respond to any incidents.
- 3.5 DIO has consulted with Aquatrine (a service provided by Severn Trent Services) who have confirmed sufficient capacity for both clean water supply and foul water drainage for the maximum number of service users.
- 3.6 A detailed site-specific engagement plan has been created which sets out the Home Office engagement strategy and provides detail on various ways engagement will be undertaken with local residents, the local community and the wider general public through resident surgeries, factsheets and Q&A forums. A Community Impact and Insight Assessment is in the process of being completed for the Site. This assessment will consider the impact on the community and is based on insight and understanding about the current position, history and future plans, for that community. It will then identify any mitigation required to alleviate any adverse effects. In particular it will assess:
 - Land Use and Growth Plans;
 - Social impact;
 - Impact on public services; and
 - Economic impacts.
- 3.7 The above measures will assist in mitigating any fear of crime, anti-social behaviour and community tension. The Service Provider, responsible for managing all services on Site, will be required to educate the local community on the use of the Site and, if required, will manage any demonstrations. The Service Provider will take advice on the approach to take from the police and other agencies to mitigate any potential community tensions. The Service Provider will work closely with and comply with any instructions issued by the local authority and Police with regard to community cohesion, serious or persistent anti-social or violent behaviour.
- 3.8 The day-to-day running of the Site during the operational phase and the legal responsibilities and governance functions associated with the Proposed Development will be detailed in an Operational Site Management Plan prior to the Site being occupied.

4. Conclusion

This letter and assessment table provide a brief description of the Proposed Development and the likely significant effects on the environment in line with the requirements of Regulation 6(2) and Schedule 3 of the EIA Regulations. Whilst the Proposed Development is likely to be Schedule 2 development, with regards to the selection criteria for screening Schedule 2 developments in Schedule 3 of the EIA Regulations, and the related guidance in the PPG, it is concluded that with the implementation of appropriate mitigation the Proposed Development is not likely to result in significant adverse effects on the environment by virtue of factors such as its nature, size or location. As such, it is considered that the Proposed Development does not constitute 'EIA development'.

The mitigation measures, as outlined above or in the assessment table will be incorporated into the design of the Proposed Development where appropriate.

We trust that this letter supplies you with sufficient information and we would be grateful to receive your formal EIA Screening Opinion in line with Regulation 6(1) of the EIA Regulations.

In the meantime, please do not hesitate to contact us using the contact details below should you have any queries.

Yours sincerely,

[Redacted signature block]

[Redacted contact details]

[Redacted contact details] @aecom.com

A Screening Criteria Question	B Response to the Screening Criteria Question in Column A (Yes/No and explanation of reasons)		C Is a Significant Effect Likely? (Yes/No and explanation of reasons (nb if the answer in Column B is 'No', Column C is not applicable))	
1. NATURAL RESOURCES				
1.1 Will construction, operation or decommissioning of the project involve actions which will cause physical changes in the topography of the area?	Yes	<p>Works involve refurbishment of existing buildings or placement of modular buildings on hard standing. Other than minor works to allow connections to existing utilities no other ground works are proposed.</p> <p>The exact specification of the modular units is yet to be determined, however a one-bed unit is expected to be approximately 12 metres (m) long, 4 m wide and 3.3m tall.</p>	No	<p>No changes to the natural physical features of the area are proposed as a result of the refurbishment due to the nature of the works.</p> <p>The modular units will be introduced into an area that is already developed and these will be single storey. The height of the modular units is lower than the height of the existing buildings in the area (which are up to 3 storeys in height, approximately 12 - 15m). In addition the modular units will be temporary and present on the Site for 12 months. Therefore no significant effects on the physical features of the area are anticipated.</p>
1.2 Will construction or operation of the project use natural resources above	Yes	Energy and water will be utilised during both construction and operation of the Site. Material	No.	<u>Construction</u>

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<p>or below ground such as land, soil, water, materials/minerals or energy which are non-renewable or in short supply?</p>	<p>will be required for the refurbishment of six existing barracks buildings and the conversion of two barracks buildings from office to residential use.</p>	<p>The refurbishment works and set up of the modular accommodation would result in energy consumption from the use of plant and vehicles, water from on-site cabins and general cleaning and dust suppression, fuel consumption for the transport of materials and workers, and the disposal of waste. Usage of energy, water and emissions to air would be reduced as far as possible through implementation of best practice measures during construction.</p> <p>All modular units will be constructed off-site.</p> <p><u>Operation</u></p> <p>Additional energy and water use will be required to operate the new modular units on site.</p> <p>Sustainable materials, energy efficient lighting, heating and appliances, insulation and water-saving devices, heating and appliances would be included within the design of the refurbishment works, where feasible, and the design of the modular buildings.</p> <p>An Operational Traffic Management Plan will be implemented to ensure that vehicles accessing</p>

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			<p>the Site are used efficiently and fuel use is minimised.</p> <p>A Waste Management Plan will be prepared in line with the relevant guidance (e.g. British Standards 5906:2005 Waste Management in Buildings). This will ensure that sustainable methods for waste and recycling management are implemented during the operation of the Proposed Development</p> <p><u>Decommissioning</u></p> <p>When the Site is decommissioned the modular units will be disconnected from utilities and will be removed from the Site. Energy use would be required to load the vehicles for transport off-Site. Use of energy would be reduced as far as possible through implementation of best practice measures.</p> <p>All modular units will be repurposed.</p>
<p>1.3 Are there any areas on/around the location which contain important, high quality or scarce resources which could be affected by the project, e.g. forestry, agriculture, water/coastal, fisheries, minerals?</p>	<p>Yes</p>	<p>There are two Sites of Special Scientific Interest (SSSIs) within 10 km of the Site:</p> <ul style="list-style-type: none"> Bovingdon Hall Woods SSSI (Ref 1001682) is designated for its extensive medieval woodlands of historical interest and is 	<p>No</p> <p><u>Construction</u></p> <p>Due to the distance between the Site and the designated ecological sites no significant effects are likely.</p>

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	<p>located approximately 5 km south-east of the Site; and</p> <ul style="list-style-type: none"> • West Wood, Little Sampford SSSI (Ref 1001715) is also designated as a Local Wildlife Site (LWS) and is located approximately 8.9 km west of the Site. <p>There are no Ramsar sites, Special Areas of Conservation (SACs) or Special Protected Areas (SPAs) within 10 km of the Site. The nearest National Nature Reserve (NNR) is Hales Wood, 16 km to the northwest.</p> <p>There are four non-statutorily designated ancient woodlands within 2 km of the Site:</p> <ul style="list-style-type: none"> • Ostend Wood (ID 1116720) located approximately 1 km north of the Site • Outfield Wood (ID 1116719) located approximately 565 m northwest of the Site; • Park Wood (ID 1116722) located approximately 785 m northeast of the Site; and • Poor Park (ID 1116721) located approximately 500 m south of the Site. <p>A HRA Screening Report has been prepared following consultation with Natural England. The HRA Screening Report concludes with a high degree of confidence, that there will not be a</p>	<p>Should any vegetation clearance be required this should be undertaken outside of the bird breeding season (usually considered to be March to September inclusive). Should this not be possible, the clearance works will be supervised by an ecologist following a nesting bird check immediately prior to the works. In the event that any nesting birds are found in vegetation or on the buildings to be refurbished, the clearance work in the immediate area will cease immediately, the area containing the nest/s will be left in situ and an appropriate buffer zone will be established. This area will be left intact until it has been confirmed by the project ecologist that the young have fledged, and the nest is no longer in use.</p> <p>Surveys undertaken by the Ministry of Justice (MoJ) identified Skylarks (<i>Alauda arvensis</i>) occupying the area around the airfield. However, the species is frequent within the county and therefore any population present would be of no more than negligible (local) value. The works proposed will not require the removal of any grass, trees or hedgerows, and therefore are not likely to disturb any Skylark assemblages.</p>

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	<p>likely significant effect from the proposal on any European sites, either alone or in combination with other projects and plans.</p> <p>There are no Mineral Safeguarding Areas (MSAs) or Mineral Consultation Areas (MCAs) within 250 m of the Site as identified within Policy S8 of Essex County Council (ECC)'s Minerals Local Plan (MLP)¹.</p>	<p>The refurbishment works will be restricted to existing barrack blocks. Since these will be minor in nature and quick in duration, there will be no effects on ecology and biodiversity.</p> <p>The installation of modular units on the Site will involve modular units being imported from off-site and therefore no construction works, other than minor ground-breaking to provide a connection to utilities, will be required.</p> <p>A Habitats Regulations Assessment (HRA) Screening Report has been prepared following consultation with Natural England. The HRA Screening Report concludes with a high degree of confidence, that there will not be a likely significant effect from the proposal on any European sites, either alone or in combination with other projects and plans.</p> <p>In accordance with Regulation 76 of the Conservation of Habitats and Species Regulations 2017 an HRA Screening request has been submitted to Natural England. The response from Natural England received confirms that likely significant effects on</p>

¹ ECC, 2014. *Essex Minerals Local Plan 2014*. Available from <https://assets.ctfassets.net/knkzaf64jx5x/5UZuVtnjZbJ81olvZoZKVX/90acfc65df6fa8ee8ab20df3f0cda1c8/essex-minerals-local-plan-adopted-july-2014.pdf>

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		<p>European sites alone, or in combination with other plans or projects, are unlikely (see Appendix B).</p> <p><u>Operation</u></p> <p>Due to the distance between the Site and the designated ecological sites no significant effects are likely. However there is a potential for increased recreational pressure on the nearby ancient woodlands, including Poor Park to the south. As part of the Operational Management Plan for the facility mitigation will be implemented to reduce recreational pressure on nearby woodlands, including providing signage and information boards to encourage use of existing footpaths.</p> <p>Lighting that is part of the existing facility will be used and supplemented by additional low level lighting where required. No new lighting will be installed along the existing road adjacent to the south of the Site. New lighting will be directed into the Site and will be positioned a minimum distance of 2m from the Site boundary.</p> <p>To ensure existing wildlife corridors around and within the Site are maintained any new lighting required in the vicinity of the modular units and</p>

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			<p>existing barracks buildings will be well designed to an appropriate specification and directional so as not to impact the surrounding environment. It is proposed that operational lighting in external areas is developed to incorporate the below to avoid adverse impacts on wildlife and nuisance arising from lighting:</p> <ul style="list-style-type: none"> - Use of warm lighting (2,700k or less); and - Use of downward facing lighting with asymmetric beams, shielded from spill. <p><u>Decommissioning</u> The removal of modular units from the existing hardstanding is not expected to result in any significant effects.</p>
2. WASTE			
<p>1.4 Will the project produce solid wastes during construction or operation or decommissioning?</p>	Yes	<p>Waste is expected to be generated from the internal refurbishment of the barracks buildings. Since the modular buildings will be constructed off-site waste arisings are expected to be minimal. The majority of waste is expected to be generated when the Proposed Development is operational. Waste sources once the Proposed Development is operational include the residential (service users) and</p>	<p>No</p> <p><u>Construction</u> Should any asbestos containing materials be discovered, then its removal off-site would follow best practice guidance and be taken by licenced contractors for disposal at an appropriately licenced waste management facility.</p>

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		community uses, including healthcare, laundry and dining facilities.	<p>Materials arisings will be managed and minimised as far as reasonably possible, in compliance with the legal duty of care outlined within The Waste Hierarchy² through the methods of waste prevention, segregation, reuse and recycling, whenever possible.</p> <p>The following designing-out-waste principles will be employed to promote resource efficiency wherever possible:</p> <ul style="list-style-type: none"> • Construction will take place off site, wherever possible, for example the modular units will be fully constructed off site (internal construction works e.g. partitioning will take place as part of the installation); and • Construction will be in line with resource-efficiency procurement e.g. the recovery of existing materials for recycling or reuse. <p>During refurbishment of the existing barracks buildings and installation of the modular units, the Contractor would be required to minimise waste and maximise the use of site-won, locally sourced and low carbon materials, where</p>

² Directive 2008/98/EC of the European Parliament and of the Council of 19 November 2008 on waste and repealing certain Directives (Text with EEA relevance)

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		<p>possible. Due to the scale and nature of the works, the required materials are unlikely to have significant effects on resource demand in the county. Similarly, the Proposed Development is unlikely to result in waste quantities that would have significant effects on the capacity of waste infrastructure within the county.</p> <p><u>Operation</u></p> <p>Waste generated during the operational phase of the Proposed Development will be collected and disposed of by licensed waste management contractors. Waste storage areas will be provided to store both residential (service users) and commercial waste arisings. An Operational Waste Management Plan will be prepared in line with the relevant guidance (e.g. <i>British Standards 5906:2005</i>) to demonstrate how sustainable methods for waste and recycling management will be taken into account during the operation of the Proposed Development, complying with the Waste Hierarchy through the methods of waste prevention, segregation, reuse and recycling.</p> <p><u>Decommissioning</u></p>

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			When the Site is decommissioned the modular units will be disconnected from utilities and will be removed from the Site. All modular units will be repurposed.
3. POLLUTION AND NUISANCES			
<p>1.5 Will the project release pollutants or any hazardous, toxic or noxious substances to air?</p>	Yes	<p>During refurbishment and installation of the modular units, there is potential for the generation of dust and the emission of volatile organic compounds, due to activities such as woodwork and plastering, and increases in particulate matter (PM₁₀) and nitrogen dioxide (NO₂) concentrations due to emissions from road traffic and plant (i.e. non-road mobile machinery (NRMM)).</p>	<p>No</p> <p><u>Construction</u> Given that the refurbishment works are internal to the existing buildings any emissions are expected to be contained.</p> <p>Emissions from NRMM will be managed through best practice measures.</p> <p>Emissions from vehicles will be temporary in nature during the refurbishment works and installation of the modular buildings. It is estimated that during the 6 month construction period a total of 120 one-way trips per day (equivalent of 12 trips per hour during construction hours) This will result in a temporary impact on the local highway network but the number of vehicle trips are not considered to be significant in volume and therefore no significant effects are expected from traffic emissions.</p> <p><u>Operation</u></p>

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		<p>The main sources of emissions to air during the operation of the Proposed Development would be associated with the operational traffic movements. These are likely to be limited to the travel and transport of service users and employees to and from the Site by vehicle and servicing by delivery vehicles. Coaches will transport service users to and from the Site approximately four to six times per day.</p> <p>A shuttle bus service will run up to twice a day initially, increasing as the population increases to provide service users and employees of the Site a direct connection to Braintree.</p> <p>There will be approximately 70 staff employed on Site each day. It is expected that staff will mainly travel to work via private car or by shuttle bus from Braintree or other towns in the surrounding area</p> <p>A total of 204 one way trips each day are estimated over the temporary 12 month period. This will result in a temporary impact on the local highway network but the number of vehicle trips are not considered to be significant in volume.</p>

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			<p>However, it is proposed that an Operational Traffic Management Plan is established to set out the arrangements for the running of the shuttle bus service, coaches, operational workers travel and delivery and servicing. With an Operational Traffic Management Plan in place, it is considered that no significant effects on traffic and transport as a result of the Proposed Development are likely.</p> <p><u>Decommissioning</u></p> <p>When the Site is decommissioned the modular units will be disconnected from utilities and will be removed from the Site. The total vehicle trips will be less than that assumed for the construction phase and therefore no significant effects are identified</p>
<p>1.6 Will the project cause noise and vibration or release of light, heat, energy or electromagnetic radiation?</p>	<p>Yes</p>	<p>During refurbishment and installation of the modular units, there is potential for the generation of noise and vibration. Noise and vibration will also be generated from the traffic movements during all stages of the project as well as NRMM during the refurbishment/installation and decommissioning stages.</p>	<p>No</p> <p><u>Construction</u></p> <p>During the refurbishment potential effects may occur due to noise and vibration. These activities will be restricted to the building interiors and will not involve heavy machinery or activities such as piling, excavation or groundworks. These impacts are likely to be localised and temporary in nature over the duration of the refurbishment works.</p> <p>Road traffic associated with the works at the Site will include construction staff vehicles as well as Heavy Goods Vehicles (HGVs)</p>

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		<p>transporting goods and materials, especially during the modular building installation. These movements will occur over the duration of the works (circa. 6 months). Therefore, the Proposed Development is expected to result in a temporary uplift in traffic movements on the surrounding highway network during construction. It is estimated that during the 6 month construction period a total of 120 one-way trips per day (equivalent of 12 trips per hour during construction hours) This will result in a temporary impact on the local highway network but the number of vehicle trips are not considered to be significant in volume and therefore no significant effects are considered likely.</p> <p>During the setup of the modular units within the Site of the Proposed Development, noise may occur from NRMM used to unload the units from lorries and positioning them within the Site. There will be an increase in traffic during this period where potential effects may occur due to noise and vibration arising from the vehicles transporting the modular units. These impacts are likely to be localised and short-term. As such, no significant effects are considered likely.</p>

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		<p><u>Operation</u></p> <p>During occupation of the Proposed Development, potential noise and vibration impacts would be associated with the operational road traffic, specifically coaches and servicing vehicles accessing the Site. A total of 204 one way trips each day are estimated over the temporary 12 month period. This will result in a temporary impact on the local highway network but the number of vehicle trips are not considered to be significant in volume.</p> <p>However, it is proposed that an Operational Traffic Management Plan is established to set out the arrangements for the running of the shuttle bus service, coaches, operational workers travel and delivery and servicing. With an Operational Traffic Management Plan in place, it is considered that no significant effects on traffic and transport as a result of the Proposed Development are likely.</p> <p>Lighting that is part of the existing facility will be used and supplemented by additional low level lighting where required. No new lighting will be installed along the existing road adjacent to the south of the Site. New lighting will be directed into the Site and will be positioned a</p>

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		<p>minimum distance of 2m from the Site boundary.</p> <p>To ensure existing wildlife corridors around and within the Site are maintained any new lighting required in the vicinity as part of the modular units will well designed to an appropriate specification and directional so as to not to impact the surrounding environment. It is proposed that operational lighting in external areas is developed to incorporate the below to avoid adverse impacts on wildlife friendly measures and nuisance arising from lighting:</p> <ul style="list-style-type: none"> - Use of warm lighting (2,700k or less); and - Use of downward facing lighting with asymmetric beams, shielded from spill. <p><u>Decommissioning</u></p> <p>During the dismantling of the modular units within the Site, noise may occur from NRMM used to load the units onto lorries. There will be an increase in traffic during this period where potential effects may occur due to noise and vibration arising from the vehicles transporting the modular units. These impacts are likely to</p>

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			be localised and short-term. As such, no significant effects are considered likely.
<p>1.7 Will the project lead to risks of contamination of land or water from releases of pollutants onto the ground or into surface waters, groundwater, waters or the sea?</p>	Yes	<p>The Site is located within Source Protection Zone (SPZ) 3 (Total Catchment).</p> <p>Installation of modular buildings will require some localised breaking of ground to connect them to existing utilities. This means that there may be potential for the localised exposure of contaminated soils.</p> <p>Potential active sources of contamination may arise from the Site's historical development and previous use as an RAF site.</p>	<p>No</p> <p><u>Construction</u> The majority of the construction work comprises the proposed interior refurbishment of the existing barrack buildings, and installation of modular units on existing hardstanding. These works are generally located away from existing watercourses and are unlikely to lead to any change to the risk of surface water or fluvial flooding whilst the works are ongoing.</p> <p>During installation of the modular units, there is potential for the generation of dust, the emission of volatile organic compounds and accidental loss or spillage of materials. All works would be carried out in accordance with current best practice and legislative requirements.</p> <p>There is the potential that localised breaking of the ground to connect the modular units to the existing utilities could create a pollution pathway for materials used during the works or for historic contamination to enter nearby groundwater or surface water receptors. Once specific locations are identified for the utilities</p>

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		<p>connections further assessment of previous Site Investigations will be undertaken to identify any contamination issues. Prior to breaking ground any significant contamination risks will be identified and appropriate mitigation measures will be implemented. This would include best practice methods being applied to minimise the risk of contamination including fencing off contaminated areas, routing of service connections in non-contaminated land, use of Personal Protective Equipment (PPE) by the site workers and a watching brief during the works to observe any discolouration, odour or other changes which may indicate the potential for contamination to be present. In the event that contamination is suspected soil sampling should be undertaken and works suspended until the type of contamination present has been identified and an appropriate strategy has been identified to either remediate the contamination (e.g. excavation of affected soils or identify an alternative location for the connection to existing utilities).</p> <p>Since the Site is located within SPZ3 (Total Catchment), the risk of groundwater contamination created by the minor groundworks associated with utilities connection works is fairly low risk because there is a travel</p>

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		<p>time of greater than 400 days between the Site and the nearest groundwater abstraction point.</p> <p>Therefore, the pollution risk to groundwater and surface water from the proposed refurbishment works and installation of the modular units is very low. Any health and safety risks to contractors during the works would be managed in accordance with relevant health and safety legislation. Overall, it is unlikely that significant effects on the ground, surface and ground waters will occur as a result of the works. This will be further mitigated once specific utility connections are identified.</p> <p><u>Operation</u></p> <p>Given the nature of the proposed uses, the Proposed Development would not introduce significant new sources of contamination during operation and although a change of use is proposed the Site has been used in the past for accommodation. The use of grassed areas for recreation could expose service users to potential historic contamination. The contamination risk raised in consultation is limited to the airfields which are not part of the Proposed Development. The grassed areas will be further assessed and mitigation implemented.</p>

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		<p>if is identified they are not suitable for their proposed use. As such, no likely significant effects associated with ground conditions and contamination have been identified with the implementation of any mitigation measures identified as required.</p> <p>The proposal to accommodate up to a total of up to 1,700 people on the Site for 12 months would increase the demand in the area on water supply and foul water drainage. Any increase in clean water demand or foul water discharge would have to be agreed in advance with Anglian Water to prevent increased pressure being placed on water resources and the local drainage infrastructure network.</p> <p><u>Decommissioning</u></p> <p>Once the modular buildings are removed the hardstanding will remain. No significant effects are likely.</p>

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<p>1.8 Are there any areas on or around the location which are already subject to pollution or environmental damage, e.g. where existing legal environmental standards are exceeded, which could be affected by the project?</p>	No	<p>There are no Air Quality Management Areas (AQMAs), historic landfill sites³ or known areas of contaminated land in or around the Site. There are no designated AQMAs within a 15 km radius of the Site. The roads to be used during transportation of the modular units or other construction traffic routes and the roads to be used during operation of the Proposed Development (e.g. the shuttle bus service) do not pass through an AQMA.</p>	No	
4. POPULATION AND HUMAN HEALTH				
<p>1.9 Will there be any risk of major accidents (including those caused by climate change, in accordance with scientific knowledge) during construction, operation or decommissioning?</p>	Yes	<p>[REDACTED]</p> <p>[REDACTED]</p> <p>[REDACTED]</p> <p>[REDACTED]</p> <p>[REDACTED]</p> <p>The MOD will remove aviation fuel if any is stored on site or ensure it is securely contained.</p> <p>The Site may be the focus for protests and demonstrations.</p>	No	<p><u>Construction</u></p> <p>The vulnerability of the Proposed Development to natural disasters is likely to be related to flood risk and the potential impact that climate change may have on this. The risk of flooding at the Site will not change from that currently experienced following the refurbishment of the Proposed Development. The modular units will be placed on land which is in Flood Zone 1 and consequently will avoid areas at high risk of flooding from surface water.</p>

³ Data.gov.uk, open source data. Available at: <https://data.gov.uk/data/map-preview?e=2.072&n=55.816&s=49.943&url=http%3A%2F%2Fenvironment.data.gov.uk%2Fds%2Fwms%3FSERVICE%3DWMS%26INTERFACE%3DENVIROCOMMENT--7a955570-d465-11e4-a37c-f0def148f590%26request%3DGetCapabilities&w=-6.236>.

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		<p>The existing resident population of Wethersfield and Finchingfield is 50:50 male/female, relatively older with a high share of the population over 60 years; and almost entirely of White British ethnicity. The addition of up to 1,700 service users is likely to be male, younger, more ethnically diverse than the existing demographic mix.</p> <p>There is the potential for protests from three key groups:</p> <ul style="list-style-type: none"> • Local residents who object to the usage of the site for accommodation. • Pro-immigration groups who have concerns about the perceived conditions on the site. • Anti-immigration groups who object to the housing of asylum seekers or their arrival in the country. <p>The Home Office will continue to work with the local police and community cohesion teams to minimise the risk of negative behaviour and strategies will be created to handle such behaviours. The facility would be self-contained, a voluntary 10pm curfew implemented and it will have 24 hours on-site</p>

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		<p>security. The police have confirmed they are ready to respond to any incidents</p> <p>An Equalities Impact Assessment under section 149 Equality Act 2010 has been carried out to assess the potential for victimisation and harassment of asylum seekers and is appended to this EIA Screening Letter in Confidential Appendix A.</p> <p>A detailed engagement plan has been created which provides the various way in which engagement will be held with the local community and wider general public through resident surgeries, factsheets and Q&A forums. A Community Impact Assessment has also been completed. These will assist in mitigating any anti-social behaviour and community tension. Therefore, there are no likely significant effects during the operational phase.</p> <p>Considering the scope and the temporary nature of the Proposed Development (up to 12 months in duration), and the mitigation measures described above, no significant effects are considered likely to arise from the Proposed Development and as a result of its vulnerability to existing major accident and disaster hazards.</p>

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			<p><u>Decommissioning</u></p> <p>During the decommissioning phase, modular units will be removed from existing hardstanding and transported off-site. No likely significant effects are anticipated during this phase.</p>
<p>1.10 Will the project present a risk to the population (having regard to population density) and their human health during construction, operation or decommissioning? (for example due to water contamination or air pollution)</p>	<p>Yes</p>	<p>There is the potential for adverse health impacts to construction workers.</p> <p>Health of asylum seekers and workers during the operational phase.</p>	<p>No</p> <p><u>Construction</u></p> <p>There is potential for adverse health impacts to construction workers. Any health and safety risks during the works would be managed in accordance with relevant health and safety legislation. No likely significant effects are anticipated.</p> <p><u>Operation</u></p> <p>Healthcare provision will be managed by the ICB and will be fully integrated and available on day one. This could be a combination of both on-site and off-site provision. The demand for health provision will be monitored, with provision increased, if required to ensure that there are no significant effects upon local healthcare infrastructure.</p> <p>Asylum seekers will be screened for both health and vulnerability prior to being transported to the Site. This will help identify and manage the</p>

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			<p>potential for infectious diseases to spread. A vaccination programme will also be implemented as part of the healthcare provision. <u>Decommissioning</u></p> <p>There is potential for adverse health impacts to decommissioning workers loading the modular units onto lorries to be transported off-site. Any health and safety risks to contractors during the works would be managed in accordance with relevant health and safety legislation. No likely significant effects are anticipated.</p>
5. WATER RESOURCES			
<p>1.11 Are there any water resources including surface waters, e.g. rivers, lakes/ponds, coastal or underground waters on or around the location which could be affected by the project, particularly in terms of their volume and flood risk?</p>	Yes	<p>The Site is located in the Blackwater Management Catchment in proximity to the following designated main rivers :</p> <ul style="list-style-type: none"> • River Pant is located approximately 2 km south of the Site, flowing from west to east. • River Colne is located approximately 3 km to the north of the Site, flowing from west to southeast. 	<p>No</p> <p><u>Construction</u></p> <p>The majority of the construction work comprises the proposed interior refurbishment of the existing barracks buildings, and installation of modular units on existing hardstanding. These works are located away from watercourses and are unlikely to lead to any change to the volume of surface water or risk of flooding.</p> <p>There is the potential that localised breaking of the ground to connect the modular units to the existing utilities could create a pollution pathway for materials used during the works or</p>

A Screening Criteria Question	B Response to the Screening Criteria Question in Column A (Yes/No and explanation of reasons)	C Is a Significant Effect Likely? (Yes/No and explanation of reasons (nb if the answer in Column B is 'No', Column C is not applicable))
	<p>In addition, the following ordinary water-courses⁵ are located on or in proximity to the Site:</p> <ul style="list-style-type: none"> • An un-named watercourse located approximately 1 km to the south of the Site, flowing from north to south. This network discharges into the River Pant. • Un-named watercourses located approximately 0.5 km to the west of the Site, flowing from north east to south west. The drainage channel(s) discharge into an un-named pond which discharges via a small watercourse to the River Pant. • A network of drainage channels are located approximately 1 km northwest of the Site, flowing from east to west. <p>The Environment Agency Flood Map for Planning shows the entirety of the Site is located in Flood Zone 1, which is defined as land having less than a 1-in-1,000 annual probability of tidal or fluvial flooding ("low probability").</p> <p>The Site is generally at very low risk from surface water flooding, as shown by the Flood Risk</p>	<p>for historic contamination to enter nearby groundwater or surface water receptors. Once specific locations are identified for the utilities connections further assessment of previous Site Investigations will be undertaken to identify any contamination issues. Prior to breaking ground any significant contamination risks will be identified and appropriate mitigation measures will be implemented. This would include best practice methods being applied to minimise the risk of contamination including fencing off contaminated areas, routing of service connections in non-contaminated land, Potential construction related impacts could result from accidental spills on-site that could filtrate down into groundwater or nearby surface waters. No likely significant effects on water resources are anticipated.</p> <p><u>Operation</u></p> <p>No additional sources of contamination will be introduced during the operational phase.</p> <p>The proposal to accommodate up to a total of up to 1,700 people on the Site for a period of</p>

⁵ Ordinary watercourses include every river, stream, ditch, drain, cut, dyke, sluice, sewer (other than a public sewer) and passage through which water flows and which does not form part of a main river.

A Screening Criteria Question	B Response to the Screening Criteria Question in Column A (Yes/No and explanation of reasons)	C Is a Significant Effect Likely? (Yes/No and explanation of reasons (nb if the answer in Column B is 'No', Column C is not applicable))
	<p>from Surface Water mapping⁶. The map indicates some ponding can occur to the western border of the Site.</p> <p>There are no reservoirs located within 1 km of the Site.</p>	<p>12 months would increase the demand in the area on water supply and foul water drainage.</p> <p>Aquatrine is a partnering contract which serves MOD sites across Great Britain and works alongside local water service providers to secure water and wastewater supply services. For Wethersfield the service provider is Severn Trent Services. Consultation has been held with Aquatrine who have confirmed with Anglian Water that there is sufficient capacity for the provision of water and wastewater services for the Proposed Development.</p> <p>The modular units will be placed upon existing hardstanding, and therefore will not lead to increased rates of surface water runoff. No significant effects are anticipated with regards to contamination, foul and surface water drainage on water resources as a result of the Proposed Development.</p> <p><u>Decommissioning</u></p> <p>During the decommissioning phase the modular units will be disconnected from the utilities and transported off-site. Machinery used to load the lorries will be operated using best practice</p>

⁶ Environment Agency. *Check your long-term flood risk*. [Accessed 2 March 2023]. Available from: <https://check-long-term-flood-risk.service.gov.uk/map>

A Screening Criteria Question	B Response to the Screening Criteria Question in Column A (Yes/No and explanation of reasons)	C Is a Significant Effect Likely? (Yes/No and explanation of reasons (nb if the answer in Column B is 'No', Column C is not applicable))
		industry standard. No likely significant effects are anticipated.

6. BIODIVERSITY (SPECIES AND HABITATS)

<p>1.12 Are there any protected areas which are designated or classified for their terrestrial, avian and marine ecological value, or any non-designated / non-classified areas which are important or sensitive for reasons of their terrestrial, avian and marine ecological value, located on or around the location and which could be affected by the project? (e.g. wetlands, watercourses or other water-bodies, the coastal zone, mountains, forests or woodlands, undesignated nature reserves or parks. (Where designated indicate level of designation (international, national, regional or local))).</p>	Yes	<p>There are no European designated Ramsar sites, Special Areas of Conservation (SACs) or Special Protected Areas (SPAs) within 1 km of the Site. The nearest National Nature Reserve (NNR) is Hales Wood, 16 km to the northwest.</p> <p>There are two Sites of Special Scientific Interest (SSSIs) within 10km of the Site:</p> <ul style="list-style-type: none"> • Bovingdon Hall Woods SSSI (Ref 1001682) is designated for its extensive medieval woodlands of historical interest and is located approximately 5 km south-east of the Site; and • West Wood, Little Sampford SSSI (Ref 1001715) is also designated as a Local Wildlife Site (LWS) and is located approximately 8.9 km west of the Site. <p>There are no Ramsar sites, Special Areas of Conservation (SACs) or Special Protected Areas (SPAs) within 10 km of the Site. The nearest National Nature Reserve (NNR) is Hales Wood, 16 km to the northwest.</p>	<p>No</p> <p><u>Construction</u> Due to the distance between the Site and the designated ecological sites no significant effects are likely.</p> <p>Should any vegetation clearance be required this should be undertaken outside of the bird breeding season (usually considered to be March to September inclusive). Should this not be possible, the clearance works will be supervised by an ecologist following a nesting bird check immediately prior to the works. In the event that any nesting birds are found in vegetation or on the buildings to be refurbished, the clearance work in the immediate area will cease immediately, the area containing the nest/s will be left in situ and an appropriate buffer zone will be established. This area will be left intact until it has been confirmed by the project ecologist that the young have fledged, and the nest is no longer in use.</p>
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A Screening Criteria Question	B Response to the Screening Criteria Question in Column A (Yes/No and explanation of reasons)	C Is a Significant Effect Likely? (Yes/No and explanation of reasons (nb if the answer in Column B is 'No', Column C is not applicable))
	<p>There are four non-statutorily designated ancient woodlands within 2 km of the Site:</p> <ul style="list-style-type: none"> • Ostend Wood (ID 1116720) located approximately 1.3 km north of the Site; • Outfield Wood (ID 1116719) located approximately 755 m northwest of the Site; • Park Wood (ID 1116722) located approximately 885 m northeast of the Site; and • Poor Park (ID 1116721) located approximately 320 m south of the Site. <p>There are no main rivers or ordinary watercourses within the vicinity of the Site.</p>	<p>Surveys undertaken by the Ministry of Justice (MoJ) identified Skylarks (<i>Alauda arvensis</i>) occupying the area around the airfield. However, the species is frequent within the county and therefore any population present would be of no more than negligible (local) value. The works proposed will not require the removal of any grass, trees or hedgerows, and therefore are not likely to disturb any Skylark assemblages.</p> <p>The refurbishment works will be restricted to-existing barrack blocks. Since these will be minor in nature and quick in duration, there will be no effects on ecology and biodiversity.</p> <p>The installation of modular units on the Site will involve modular units being imported from off-site and therefore no construction works, other than minor ground-breaking to provide a connection to utilities, will be required.</p> <p>A Habitats Regulations Assessment (HRA) Screening Report has been prepared following consultation with Natural England. The HRA Screening Report concludes with a high degree of confidence, that there will not be a likely significant effect from the proposal on any</p>

A Screening Criteria Question	B Response to the Screening Criteria Question in Column A (Yes/No and explanation of reasons)	C Is a Significant Effect Likely? (Yes/No and explanation of reasons (nb if the answer in Column B is 'No', Column C is not applicable))
		<p>European sites, either alone or in combination with other projects and plans.</p> <p>In accordance with Regulation 76 of the Conservation of Habitats and Species Regulations 2017 an HRA Screening request has been submitted to Natural England. The response from Natural England received confirms that likely significant effects on European sites alone, or in combination with other plans or projects, are unlikely (see Appendix B).</p> <p><u>Operation</u></p> <p>Due to the distance between the Site and the designated ecological sites no significant effects are likely. However there is a potential for increased recreational pressure on the nearby ancient woodlands, including Poor Park to the south. As part of the Operational Management Plan for the facility mitigation will be implemented to reduce recreational pressure on nearby woodlands, including providing signage and information boards to encourage use of existing footpaths.</p> <p>Lighting that is part of the existing facility is expected to be used. To ensure existing wildlife corridors around and within the Site are</p>

A Screening Criteria Question	B Response to the Screening Criteria Question in Column A (Yes/No and explanation of reasons)		C Is a Significant Effect Likely? (Yes/No and explanation of reasons (nb if the answer in Column B is 'No', Column C is not applicable))
			<p>maintained Any additional lighting required in the vicinity of the modular units and existing barracks buildings will be well designed to an appropriate specification and directional so as not to impact the surrounding environment. It is proposed that operational lighting in external areas is developed to incorporate the below to avoid adverse impacts on wildlife and nuisance arising from lighting:</p> <ul style="list-style-type: none"> - Use of warm lighting (2,700k or less); and - Use of downward facing lighting with asymmetric beams, shielded from spill <p><u>Decommissioning</u></p> <p>The removal of modular units from the existing hardstanding is not expected to result in any significant effects.</p>
<p>1.13 Could any protected, important or sensitive species of flora or fauna which use areas on or around the site, e.g. for breeding, nesting, foraging, resting, over-wintering, or migration, be affected by the project?</p>	<p>Yes</p>	<p>Skylarks (<i>Alauda arvensis</i>).</p> <p>Other nesting birds.</p>	<p>No</p> <p><u>Construction</u></p> <p>Skylark is frequently occurring within the county and therefore any population present would be of no more than local value. The works proposed will not require the removal of any grass, trees and hedgerows, and therefore are not likely to disturb any Skylarks.</p> <p><u>Operation</u></p>

A Screening Criteria Question	B Response to the Screening Criteria Question in Column A (Yes/No and explanation of reasons)	C Is a Significant Effect Likely? (Yes/No and explanation of reasons (nb if the answer in Column B is 'No', Column C is not applicable))
		<p>Lighting that is part of the existing facility will be used and supplemented by additional low level lighting where required. No new lighting will be installed along the existing road adjacent to the south of the Site. New lighting will be directed into the Site and will be positioned a minimum distance of 2m from the Site boundary.</p> <p>To ensure existing wildlife corridors around and within the Site are maintained any new lighting required in the vicinity of the modular units must be well designed to an appropriate specification and directional so as not to impact the surrounding environment. It is proposed that operational lighting in external areas is developed to incorporate the below to avoid adverse impacts on wildlife and nuisance arising from lighting:</p> <ul style="list-style-type: none"> - Use of warm lighting (2,700k or less); and - Use of downward facing lighting with asymmetric beams, shielded from spill <p><u>Decommissioning</u></p> <p>Once the Site is decommissioned the modular units will be removed from the existing</p>

A Screening Criteria Question	B Response to the Screening Criteria Question in Column A (Yes/No and explanation of reasons)		C Is a Significant Effect Likely? (Yes/No and explanation of reasons (nb if the answer in Column B is 'No', Column C is not applicable))
			hardstanding and the Site will be vacated. No significant effects are expected.
7. LANDSCAPE AND VISUAL			
1.14 Are there any areas or features on or around the location which are protected for their landscape and scenic value, and/or any non-designated / non-classified areas or features of high landscape or scenic value on or around the location which could be affected by the project? ⁷ Where designated indicate level of designation (international, national, regional or local).	No	There are no Areas of Outstanding Natural Beauty (AONB) within 10 km of the Site..	
1.15 Is the project in a location where it is likely to be highly visible to many people? (If so, from where, what direction, and what distance?)	Yes	<p>The Site is abutted to the south by a number of Service Family Accommodation (SFA) houses which are occupied by service families. The Site is likely to be visible from these houses.</p> <p>There is a Public Right of Way (PRoW) to the south of the Site (Footpath 33 Wethersfield) that traverses farmland and extends towards Wethersfield. The current condition of the footpath is unknown and this does not provide a complete connection between the Site and Wethersfield.</p>	No <u>Construction</u> Given that all the works including the refurbishment of the existing barracks buildings and installation of modular units will be undertaken within the existing MDPGA facility which includes a number of existing buildings, the extent and magnitude of change that the Proposed Development would represent within the existing landscape would be limited. <u>Operation</u>

⁷ See question 8.1 for consideration of impacts on heritage designations and receptors, including on views to, within and from designated areas.

A Screening Criteria Question	B Response to the Screening Criteria Question in Column A (Yes/No and explanation of reasons)	C Is a Significant Effect Likely? (Yes/No and explanation of reasons (nb if the answer in Column B is 'No', Column C is not applicable))
	<p>The Site is located in the National Character Area (NCA) 86 – South Suffolk and North Essex Clayland (NE515)⁸, described by Natural England (NE)⁹ as a “<i>an ancient landscape of wooded arable countryside with a distinct sense of enclosure</i>”.</p> <p>At the district scale, the Site is located in Landscape Character Area A5 Pant River Valley¹⁰, described as a “<i>shallow valley</i>” made of “<i>predominantly arable farmland with well hedged medium to large fields on valley slopes</i>”.</p>	<p>Due to the existing use of the Site, the Proposed Development is not expected to result in any adverse landscape and visual effects or adverse effects on the character of the local area. The modular units to be introduced to the Site will not exceed the overall height of the existing buildings, and therefore are not expected to result in adverse impacts on the landscape character or significant visual impacts.</p> <p><u>Decommissioning</u></p> <p>Once the Site is decommissioned the modular units will be removed and the Site will be vacated. No significant effects are expected.</p>

8. CULTURAL HERITAGE/ARCHAEOLOGY

<p>1.16 Are there any areas or features which are protected for their cultural heritage or archaeological value, or any non-designated / classified areas and/or</p>	<p>Yes</p>	<p>There are no World Heritage Sites, Registered Parks and Gardens, Registered Battlefields,</p>	<p>No</p>	<p><u>Construction</u></p>
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⁸ Natural England. 2014. *Map: National Character Areas*. Available from: <http://publications.naturalengland.org.uk/map?category=587130> [accessed March 2023]

⁹ Natural England. 2014. *NCA Profile: 86 South Suffolk and North Essex Clayland (NE515)*. Available from: <http://publications.naturalengland.org.uk/publication/5095677797335040?map=true&category=587130> [accessed March 2023]

¹⁰ BDC. 2006. *Landscape Character of Braintree District*. Available from: <https://www.braintree.gov.uk/downloads/file/2405/e40-landscape-character-assessment-section-3-landscape-character-of-braintree-district-september-2006>

A Screening Criteria Question	B Response to the Screening Criteria Question in Column A (Yes/No and explanation of reasons)	C Is a Significant Effect Likely? (Yes/No and explanation of reasons (nb if the answer in Column B is 'No', Column C is not applicable))
<p>features of cultural heritage or archaeological importance on or around the location which could be affected by the project (including potential impacts on setting, and views to, from and within)? Where designated indicate level of designation (international, national, regional or local).</p>	<p>Scheduled Monuments or Conservation Areas within 1 km of the Site.</p> <p>The Site does not lie within a Designated Archaeological Area as defined in the Scheduled Ancient Monuments and Archaeological Areas Act 1979.</p> <p>The nearest conservation area is Wethersfield Conservation Area¹¹, approximately 1.6 km southwest of the Site. the conservation area was designated in 1973 for its historic settlement pattern and high-quality buildings of historic and architectural merit¹².</p> <p>There are four Grade II Listed Buildings within 1 km of the Site, the closest of which is Sculpin's Farmhouse (Ref 1139033) approximately 225 m northwest of the Site. Other listed buildings within 1 m include Gray's Lane Cottage (Ref 1168502), Cotton's Farmhouse (Ref 1338165) and Gray's Farmhouse (Ref 1337875).</p>	<p>Although minor groundworks are required to connect the modular units to the utilities supply, no piling or excavations are required.</p> <p>The modular units will be brought to the Site by lorries which would travel along the local road network, and would not result in a substantial increase in demand to the point that would affect the setting of any nearby listed buildings.</p> <p>It should be noted that construction traffic is likely to pass through Wethersfield Conservation Area along the B1053. Any impact arising from this is likely to be localised and temporary in nature over the approximate 6 month duration of the refurbishment works, and therefore no significant effects are expected.</p> <p><u>Operation</u></p> <p>Due to the previously developed nature of the Site and number of existing buildings on the Site during the operational phase, the Proposed</p>

¹¹ BDC. 2023. *Listed Buildings, Conservation Areas and Article 4 Directions*. Available from:

<https://braintree.maps.arcgis.com/apps/webappviewer/index.html?id=83db4230bb5046e6bca72169e40b3266> [accessed March 2023]

¹² BDC, 2021. *Wethersfield Conservation Area Character Appraisal and Management Plan*. Available from https://wethersfield-pc.gov.uk/wp-content/uploads/2022/02/WethersfieldConservationArea_CAMP.2019.pdf [accessed March 2023]

A Screening Criteria Question	B Response to the Screening Criteria Question in Column A (Yes/No and explanation of reasons)	C Is a Significant Effect Likely? (Yes/No and explanation of reasons (nb if the answer in Column B is 'No', Column C is not applicable))
	<p>The Site is located within an Essex Historic Environment Record (HER)¹³ called Cropmarks Wethersfield (ID 19043), containing cropmarks of field boundaries.</p>	<p>Development is not expected to result in any adverse effects on the settings of listed buildings in the local area.</p> <p>The shuttle-bus to Braintree and coaches bringing service-users to Site will pass through the Conservation Area. A total of 204 one way trips each day are estimated over the temporary 12 month period. This will result in a temporary impact on the local highway network but the number of vehicle trips are not considered to be significant in volume.</p> <p>However, it is proposed that an Operational Traffic Management Plan is established to set out the arrangements for the running of the shuttle bus service, coaches, operational workers travel and delivery and servicing. With an Operational Traffic Management Plan in place, it is considered that no significant effects on traffic and transport as a result of the Proposed Development are likely.</p> <p><u>Decommissioning</u></p> <p>The modular units will be transported off-site by lorries. These would travel along the local road network, the number of trips are expected to be</p>

¹³ Heritage Gateway <https://www.heritagegateway.org.uk/Gateway/> [Accessed March 2023]

A Screening Criteria Question	B Response to the Screening Criteria Question in Column A (Yes/No and explanation of reasons)		C Is a Significant Effect Likely? (Yes/No and explanation of reasons (nb if the answer in Column B is 'No', Column C is not applicable))
			less than during the construction period and are therefore not considered to be significant
9. TRANSPORT AND ACCESS			
<p>1.17 Are there any routes on or around the location which are used by the public for access to recreation or other facilities, which could be affected by the project?</p>	Yes	Part of the wider site remains operational and there is Service Family Accommodation adjacent to the Site. No facilities within the Site will be accessed by the public.	<p>No</p> <p><u>Construction</u> All construction vehicles will park within the Site, with no parking on surrounding roads thereby minimising impacts on access around the Site and to adjacent areas that remain operational.</p> <p><u>Operation</u> Once the Proposed Development is complete and operational, any potential transport implications are likely to be limited to a potential increase in demand for public transport services, the travel and transport of service users and employees to/ from the Site by vehicle, and servicing by delivery vehicles.</p> <p>A total of 204 one way trips each day are estimated over the temporary 12 month period. This will result in a temporary impact on the local highway network but the number of vehicle trips are not considered to be significant in volume.</p>

A Screening Criteria Question	B Response to the Screening Criteria Question in Column A (Yes/No and explanation of reasons)		C Is a Significant Effect Likely? (Yes/No and explanation of reasons (nb if the answer in Column B is 'No', Column C is not applicable))	
				<p>However, it is proposed that an Operational Traffic Management Plan is established to set out the arrangements for the running of the shuttle bus service, coaches, operational workers travel and delivery and servicing. With an Operational Traffic Management Plan in place, it is considered that no significant effects on traffic and transport as a result of the Proposed Development are likely.</p> <p>Sculpins Lane providing access to the Site does not have pavements. A grass-verge is available half-way down its length for pedestrians to use. The road is not a through road and has low levels of traffic from existing uses accessing off it. The risk of walking along this road, particularly in hours of darkness will be covered in the Operational Management Plan and service users will be informed of the risks and how to minimise these, for example on which side of the road to walk.</p> <p><u>Decommissioning</u></p> <p>During the decommissioning phase, HGVs will be used to transport the modular units off-site. The number of trips are expected to be fewer than during the construction stage and no significant effects are likely.</p>
1.18 Are there any transport routes on or around the location which are	Yes	The Site is located approximately 1.5 km north of the village of Wethersfield, Essex and 10 km	No	<u>Construction</u>

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<p>susceptible to congestion or which cause environmental problems, which could be affected by the project?</p>	<p>north of the nearest large town, Braintree. The Site consists of a network of internal roads accessed via Sculpins Lane to the west, which forms a junction with the B1053 circa. 1 km to the west of the Site. The Site is also accessible via Toppesfield Road to the south, although this appears to be a secondary (restricted) route. Traffic associated with the Site is expected to travel via the B1053 and access the junction with Sculpins Lane to the west. The B1053 runs towards Wethersfield and Braintree to the south with subsequent connections to the A120 and A131 with onward routes to Colchester and Chelmsford. The B1053 also extends towards Finchingfield to the northwest.</p>	<p>During both the refurbishment and the installation of modular buildings, road traffic associated with the works at the Site will include construction staff vehicles as well as Heavy Goods Vehicles (HGVs) transporting goods and materials. It is estimated that during the 6 month construction period a total of 120 one-way trips per day (equivalent of 12 trips per hour during construction hours) This will result in a temporary impact on the local highway network but the number of vehicle trips are not considered to be significant in volume and therefore no significant effects are expected on local congestion.</p> <p>It is noted that there is a conservation area south of the Site on the B1053 and HGVs accessing the Site should avoid passing through this if possible. There is an alternative route to/from the north via Finchingfield, but this also has constraints in terms of narrow sections and a bridge which would need to be avoided. HGVs. Routes used by construction vehicles will be A- roads and where feasible local roads or those which pass through town centres or sensitive areas will be avoided.</p>

A Screening Criteria Question	B Response to the Screening Criteria Question in Column A (Yes/No and explanation of reasons)	C Is a Significant Effect Likely? (Yes/No and explanation of reasons (nb if the answer in Column B is 'No', Column C is not applicable))
		<p>The timing of deliveries to the Site and HGV movements will be staggered to avoid congestion on the local road network.</p> <p><u>Operation</u></p> <p>Once the Proposed Development is complete and operational, any potential transport implications are likely to be limited to a potential increase in demand for public transport services, the travel and transport of service users and employees to/ from the Site by vehicle, and servicing by delivery vehicles.</p> <p>Coaches will transport service users to and from the Site approximately four to six times per day. A shuttle bus service provide service users and employees of the Site a direct connection to Braintree. It will run up to twice a day initially, increasing as demand requires up to a maximum of two trips per hour. This will reduce the potential for any adverse impacts on the surrounding highway network as a result of additional single occupancy vehicle trips. The remaining traffic movements to and from the Site will be associated with employees and servicing/deliveries.</p> <p>The majority of operational workers, such as maintenance, security and healthcare workers</p>

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		<p>will be expected to travel by vehicle due to the remote location of the Site and its limited accessibility by public transport. It is expected that operational workers will use the existing parking areas at the Site.</p> <p>Where possible, vehicles accessing the Site will use main roads including the A120 which forms part of the Strategic Road Network. As service users accessing and leaving the Site could come from , and be transported to, various locations in the wider area, it is not possible to specify the exact routes to be used by vehicles accessing and leaving the Site.</p> <p>Employees of the facility will be encouraged to car share or utilise the shuttle bus service (rather than travelling by private car) or to walk or cycle to the Site if possible (i.e. for employees who live locally). Assuming a worst case and each of the 70 average daily workers uses a car to reach the Site, this would equate to 140 trips going to and from the Site per day.</p> <p>A total of 204 one way trips each day are estimated over the temporary 12 month period. This will result in a temporary impact on the local highway network but the number of</p>

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			<p>vehicle trips are not considered to be significant in volume.</p> <p>However, it is proposed that an Operational Traffic Management Plan is established to set out the arrangements for the running of the shuttle bus service, coaches, operational workers travel and delivery and servicing. With an Operational Traffic Management Plan in place, it is considered that no significant effects on traffic and transport as a result of the Proposed Development are likely.</p> <p><u>Decommissioning</u></p> <p>During the decommissioning phase, HGVs will be required to transport the modular units off-site. The deliveries will be staggered to avoid congestion on the local road network.</p>
10. LAND USE			
<p>1.19 Are there existing land uses or community facilities on or around the location which could be affected by the project? E.g. housing, densely populated areas, industry / commerce, farm/agricultural holdings, forestry, tourism, mining, quarrying, facilities relating to health, education, places of worship, leisure /sports / recreation.</p>	Yes	<p>There are local services provided within the larger settlements of Braintree, Halstead, and Haverhill which asylum seekers will be able to access if required, however all services to meet the demand of the population will be met through on-site provision (or in the case of health a combination of both on and off site provision).</p>	<p>No</p> <p><u>Construction</u></p> <p>There are local residents that could be affected by the construction stage, including increased traffic, noise and air quality. It is estimated that during the 6 month construction period a total of 120 one-way trips per day (equivalent of 12 trips per hour during construction hours) This will result in a temporary impact on the local highway network but the number of vehicle</p>

A Screening Criteria Question	B Response to the Screening Criteria Question in Column A (Yes/No and explanation of reasons)	C Is a Significant Effect Likely? (Yes/No and explanation of reasons (nb if the answer in Column B is 'No', Column C is not applicable))
	<p>The Site is abutted to the south by a number of SFA houses which are occupied by UK service families.</p>	<p>trips are not considered to be significant in volume and therefore no significant effects are expected from traffic emissions.</p> <p><u>Operation</u></p> <p>The Proposed Development will provide communal services, recreational, dining, laundry and pastoral services to migrant service users who are having their applications for asylum processed. These facilities will be available from the first day of operation.</p> <p>Healthcare provision will be fully integrated and available on day one. This could be a combination of both on-site and off-site provision.</p> <p>Currently there is no evidence to suggest the proposal may give rise to problems in respect to crime, anti-social behaviour and public safety. However, the Home Office will work with local police and community cohesion teams to minimise the risk of negative behaviour and strategies created to handle such behaviours.</p> <p>A detailed engagement plan has been created which provides the various way in which engagement with the local community and wider general public will be achieved through</p>

A Screening Criteria Question	B Response to the Screening Criteria Question in Column A (Yes/No and explanation of reasons)		C Is a Significant Effect Likely? (Yes/No and explanation of reasons (nb if the answer in Column B is 'No', Column C is not applicable))	
	No	The Proposed Development will not impede any other nearby potential development from coming forward. The Ministry of Justice, are planning to construct two prisons, one Category B and one Category C housing c.3,400 prisoners, on the western side of the wider Site.		<p>resident surgeries, factsheets and Q&A forums. A Community Impact Assessment has also been completed. These will assist in mitigating any anti-social behaviour and community tension. Therefore, there are no likely significant effects during the operational phase.</p> <p>The facility would be self-contained, a voluntary 10pm curfew implemented and will have 24 hours on-site security.</p> <p><u>Decommissioning</u></p> <p>No significant effects are considered likely during the decommissioning phase as the Site would be vacated and any demands on the local community and services (if existing) would cease.</p>
<p>1.20 Are there any plans for future land uses on or around the location which could be affected by the project?</p>				11. LAND STABILITY AND CLIMATE
<p>1.21 Is the location susceptible to earthquakes, subsidence, landslides, erosion, or extreme /adverse climatic conditions, e.g. temperature inversions,</p>	No	A review of the baseline information has confirmed that the Site does not lie in an area at risk of earthquakes or subsidence.		

A Screening Criteria Question	B Response to the Screening Criteria Question in Column A (Yes/No and explanation of reasons)		C Is a Significant Effect Likely? (Yes/No and explanation of reasons (nb if the answer in Column B is 'No', Column C is not applicable))	
fogs, severe winds, which could cause the project to present environmental problems?		The Environment Agency Flood Map for Planning shows the entire Site is located in Flood Zone 1, which is defined as land having less than a 1-in-1,000 annual probability of tidal or fluvial flooding.		
12. CUMULATIVE EFFECTS				
1.22 Could this project together with existing and/or approved development result in cumulation of impacts together during the construction/operation phase?	No	<p>The EIA Regulations require that the potential for direct and indirect cumulative effects during construction or operation of a development is considered. Best practice¹⁴ dictates that cumulative assessments of this nature should have regard to those schemes which are reasonably foreseeable (i.e. usually those under construction or with planning permission), with less consideration given to development proposals for which an EIA scoping report has been submitted to a local planning authority or for which proposals are identified in the local development plans. Such a review can only be carried out based on publicly available information.</p> <p>The commonly used threshold criteria for considering whether development schemes</p>		

¹⁴ PINS (2015) Cumulative Effects Assessment Advice Note <https://infrastructure.planninginspectorate.gov.uk/wp-content/uploads/2015/12/Advice-note-17V4.pdf>

A Screening Criteria Question	B Response to the Screening Criteria Question in Column A (Yes/No and explanation of reasons)	C Is a Significant Effect Likely? (Yes/No and explanation of reasons (nb if the answer in Column B is 'No', Column C is not applicable))
	<p>have the potential to result in cumulative effects are that they must:</p> <ul style="list-style-type: none"> - Be the subject of a submitted planning application or be currently under construction; AND - Be located within an approximate 1 km radius of the Site; AND - Result in an increase of more than 10,000m² Gross External Area (GEA) in floor area or over 150 residential units. <p>Development schemes below the above thresholds are considered unlikely to result in significant cumulative effects with the Proposed Development due to their scale and limited environmental effects.</p> <p>A search of the Braintree District Council's online planning portal¹⁵ was carried out on 24th February 2023, searching all applications submitted within the last five years. Potential cumulative developments were considered using the threshold criteria above. The search confirmed that there are no potential</p>	

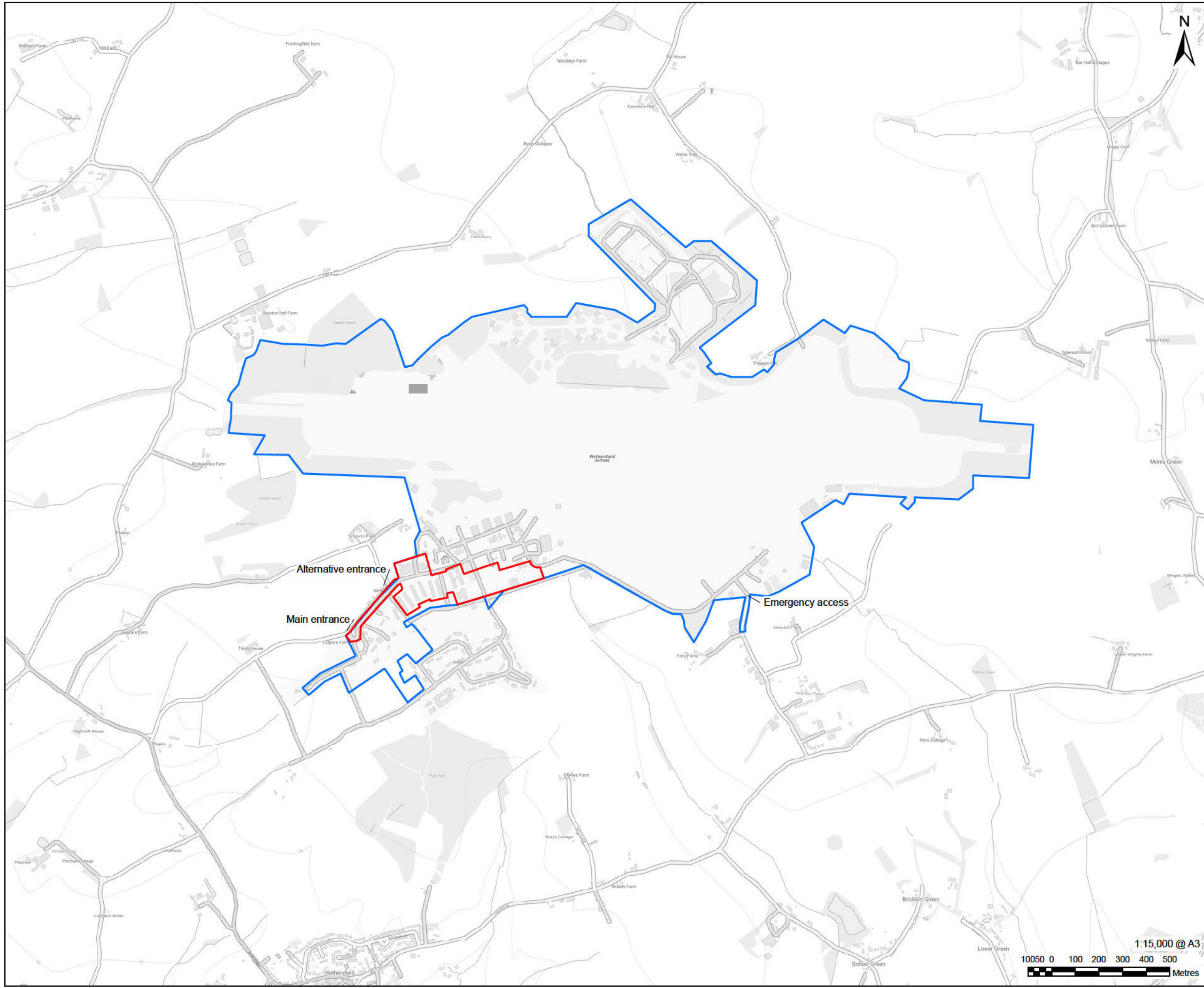
¹⁵ BDC, 2022. *View or comment on planning applications*. Available at <https://www.braintree.gov.uk/planning-building-control/view-comment-planning-applications> [Accessed March 2023]

A Screening Criteria Question	B Response to the Screening Criteria Question in Column A (Yes/No and explanation of reasons)	C Is a Significant Effect Likely? (Yes/No and explanation of reasons (nb if the answer in Column B is 'No', Column C is not applicable))
	<p>cumulative developments within 1 km radius of the Site that meet the above criteria.</p> <p>This methodology is considered suitable for consideration of cumulative effects over the PINS advice Note 17 and Highways England LA 104 as those consider nationally significant infrastructure projects and roads respectively, which is not consistent with these proposals.</p> <p>It should be noted that the MoJ are planning to construct two prisons, one Category B and one Category C housing c.3,400 prisoners, on the western side of the wider Site. However, a planning application has not yet been submitted for this development, and it therefore not subject to the above criteria.</p> <p>Some dispersed asylum accommodation is located within Braintree District Council area, however this is insignificant in number (anticipated to be less than 10) and therefore falls below the above criteria.</p>	

A Screening Criteria Question	B Response to the Screening Criteria Question in Column A (Yes/No and explanation of reasons)	C Is a Significant Effect Likely? (Yes/No and explanation of reasons (nb if the answer in Column B is 'No', Column C is not applicable))	
13. TRANSBOUNDARY EFFECTS			
1.23 Is the project likely to lead to transboundary effects? ¹⁶	No	The Proposed Development lies solely within the boundary of Braintree District Council and no transboundary effects are identified.	

¹⁶ The Regulations require consideration of the transboundary nature of the impact. Due to the England's geographical location the vast majority of TCPA cases are unlikely to result in transboundary impacts.

Figures



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HMP Wethersfield

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LEGEND
 Site Boundary
 Land Ownership

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ISSUE PURPOSE

FINAL

PROJECT NUMBER

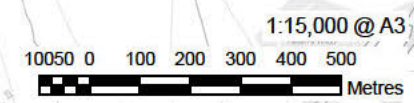
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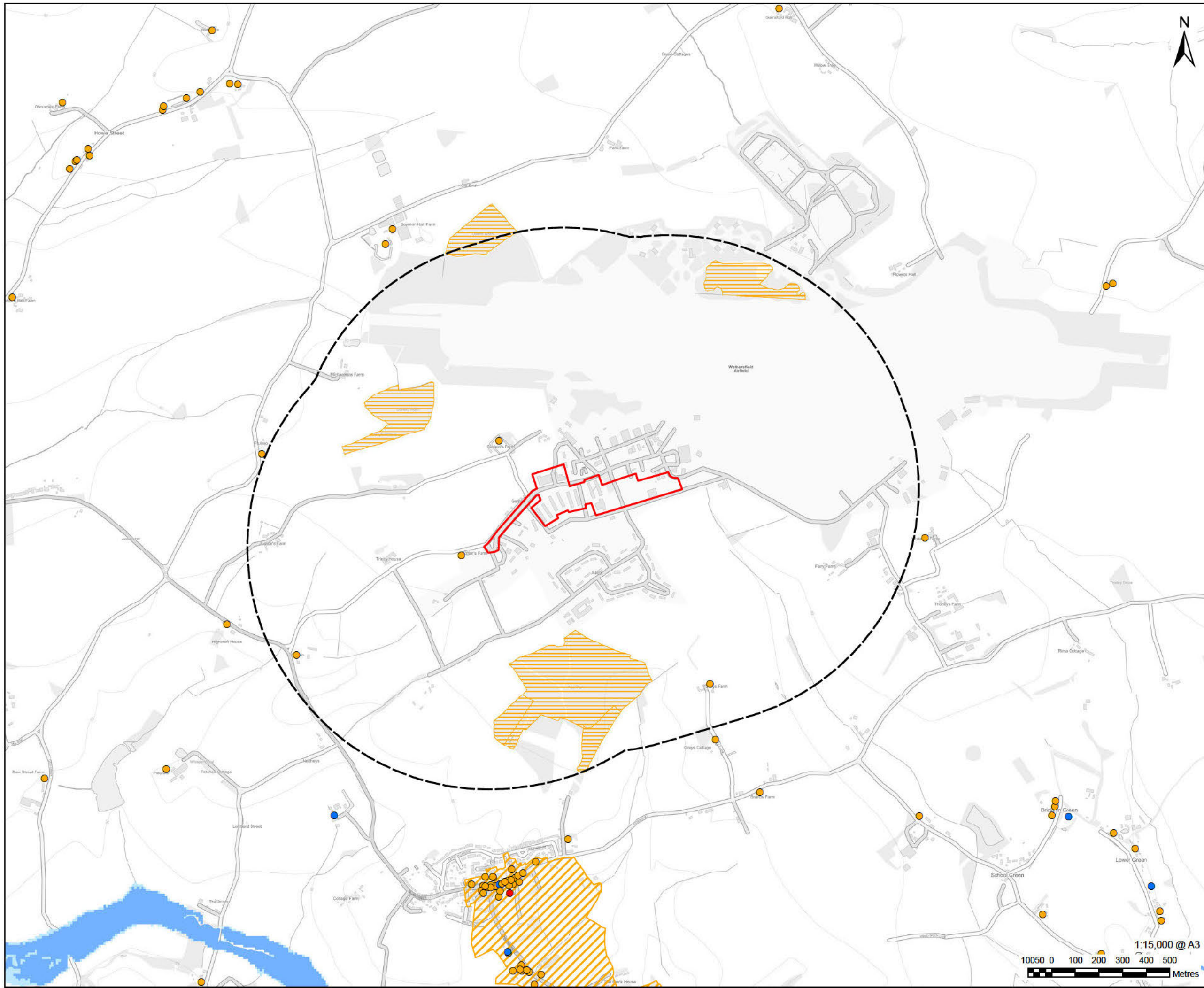
Site Location and Boundary

FIGURE NUMBER

Figure 1



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LEGEND

	Site Boundary
	Site Boundary 1km Buffer
	Conservation Area
	Ancient Woodland
	Flood Zone 3
	Flood Zone 2
	Grade I
	Grade II*
	Grade II

NOTES

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FINAL

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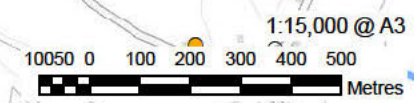
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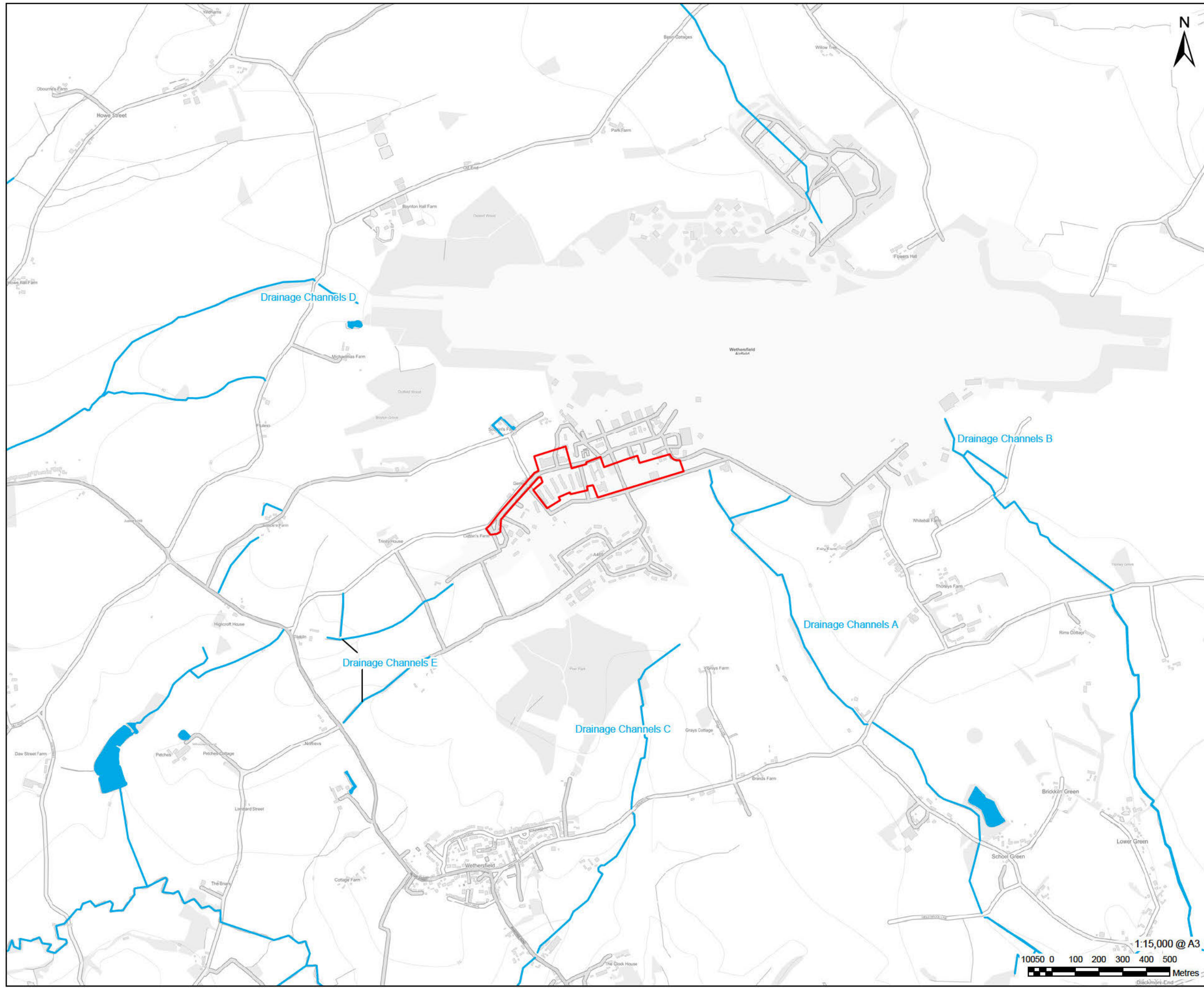
Site Context

FIGURE NUMBER

Figure 2



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LEGEND
 Site Boundary
 Watercourse

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FIGURE TITLE
Watercourses

FIGURE NUMBER
Figure 3



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Appendix B Correspondence with Natural England

Date: 16 March 2023
Our ref: 425507
Your ref: MDPGA Wethersfield



██████████
AECOM
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Alencon Link
Basingstoke, Hampshire RG21 7PP

Customer Services
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Electra Way
Crewe
Cheshire
CW1 6GJ

T 0300 060 3900

BY EMAIL ONLY

Dear ██████████

Planning consultation: Temporarily accommodating non-detained asylum applicants for a period of 12 months at the Ministry of Defence Police and Guarding Agency(MDPGA) Wethersfield headquarters and training centre for the Ministry of Defence Police (MDP)

Location: Wethersfield, Braintree, Essex

Thank you for your consultation on the above which was received by Natural England on 13 March 2023

Natural England is a non-departmental public body. Our statutory purpose is to ensure that the natural environment is conserved, enhanced, and managed for the benefit of present and future generations, thereby contributing to sustainable development.

The proposed scheme in this location appears unlikely to affect key matters within Natural England's statutory remit and does not trigger our Impact Risk Zones (IRZs) for designated sites. Based on this, and given the nature of the works and its distance from European sites, we support the conclusion of your Habitats Regulations Assessment that likely significant effects alone, or in combination with other plans or projects, are unlikely.

For any queries or further information relating to the specific advice in this letter, any new consultations, or any further information on this consultation, please email: consultations@naturalengland.org.uk.

Yours sincerely

██████████

████████████████████

West Anglia Area Team