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**Our ref:** AE/2025/130804/01-L01  
**Your ref:** UTT/25/2203/SO  
**Date:** 05 September 2025

Dear Chris

**UP TO 520 NEW HOMES (USE CLASS C3) AND UP TO 20,000 SQM OF  
COMMERCIAL FLOOR SPACE WITH PUBLIC OPEN SPACE, NEW ACCESS,  
ACTIVE TRAVEL ROUTES BETWEEN THE BIRCHANGER SITE AND STANSTED  
MOUNTFITCHET AND SUSTAINABLE URBAN DRAINAGE SYSTEM**

**LAND NORTH OF BIRCHANGER AND SOUTH OF STANSTED**

Thank you for the consultation dated 18 August 2025. We have reviewed the Environment Impact Assessment Scoping Report, and have the following considerations that we recommend are scoped in to the Environmental Statement.

**Water Quality**

Foul drainage volumes and Wastewater Treatment Plant (WwTP) capacities must be scoped into the Environmental Statement (ES).

At present, insufficient information has been presented to demonstrate that the risks of pollution posed to surface water quality can be safely managed as a result of the increased flows to the Wastewater Treatment Plant (WwTP). We therefore recommend this is scoped in to the Environment Statement.

In this case we consider that the proposed development may pose an unacceptable risk of causing a detrimental impact to surface water quality (SWQ) of The River Stort and The Great Hallingbury Brook .

As the Local Planning Authority, you should be satisfied that the receiving WWTW will have sufficient capacity to take waste water flows associated with the proposed development.

**Further considerations**

Currently, the River Stort is classified at moderate status for phosphate and the Great Hallingbury Brook is classified at poor status for phosphate under the Water Framework Directive (WFD). As there is insufficient information in this application to determine the volume of foul water and no mention of the associated Wastewater Treatment Plant (WwTP) that will treat this foul drainage, then we consider there may be significant detrimental impacts to SWQ in these waterbodies regarding phosphate and this should be considered within the Environmental Statement.

The applicant should consider the requirements of the current and emerging Local Plans, in particular:

Core Policy 34 of the Regulation 19 Draft Uttlesford Local Plan 2021-2041 it states that 'Development proposals must demonstrate how they contribute positively towards achieving 'good' status under WFD..... New developments to connect to mains foul drainage....'

Core Policy 35 'Planning approval will be contingent on adequate water supply and treatment infrastructure being in place, with no additional burden on chalk aquifer abstraction or ecology, in accordance with Core Policy 34: Water Supply and Protection of Water Resources.'

The Uttlesford Local Plan Adopted January 2005 policy ENV12 which states that 'development that would be liable to cause contamination of groundwater particularly in the protection zones shown on the proposals map, or contamination of surface water, will not be permitted unless effective safeguards are provided.'

The Uttlesford District Council Water Cycle Study states that many of the storm overflow tanks in Uttlesford are poorly performing and the "Stansted Mountfitchet WwTW is likely to be close to or exceeding its flow permit by the end of AMP9 (2035)" and "Bishops Stortford WwTP is likely to be close to or exceeding its flow permit by the end of AMP9 (2035) once all planned growth - particularly from neighbouring authorities is taken into account". As the proposed site is not allocated within the Local Plan, the Environmental Statement should consider the impact of additional flows.

These two WwTPs are the closest to the proposed development and as both WwTPs have a phosphorus limit at the lowest technically achievable level, it is not currently possible to tighten this limit to accommodate an increase in flow from the WwTPs and ensure no deterioration to the surrounding waterbodies.

### **Recommendations for Environmental Statement**

The applicant must demonstrate that there is no risk of deterioration to the Stort and Great Hallingbury Brook waterbodies as a result of the proposed development. Foul drainage volumes and Wastewater Treatment Plant (WwTP) capacities must be scoped into the EIA.

In order to assess the impact additional flows arising from this development will have on the water environment, the assessment should consider:

any cumulative effects resulting from this and other developments within the WWTW catchment;

detail expected waste water flow volume calculations arising from this development based on the type and nature of development proposed; and

also consider developers intended phasing of applications seeking permission, and specifically an estimation of when sites will likely be ready for occupation.

We look forward to reviewing a foul water strategy assessment as part of the ES for this proposal as submitted under any future applications.

### **Water Resources**

We would also recommend that Water Resources are scoped into the ES.

Increased water efficiency for all new developments potentially enables more growth with the same water resources. Developers can highlight positive corporate social responsibility messages and the use of technology to help sell their homes. For the homeowner lower water usage also reduces water and energy bills.

We endorse the use of water efficiency measures especially in new developments. Use of technology that ensures efficient use of natural resources could support the environmental benefits of future proposals and could help attract investment to the area. Therefore, we are pleased to see the inclusion of SuDS as a water efficiency measure in this scoping report. Water efficient technology, fixtures and fittings like rainwater harvesting and/or grey water recycling should be considered as part of new developments as well.

### **Residential developments**

All new residential developments are required to achieve a water consumption limit of a maximum of 125 litres per person per day as set out within the Building Regulations 2010. We recommend that wherever possible and in areas of serious water stress (as identified in our report Water stressed areas - final classification) a higher standard of a maximum of 110 litres per person per day is applied under requirement G2 in Document G of the Building Regulations 2010.3. However, the highest standard of 100 litres per person per day, that is required from Uttlesford District Council as set out in their Water Cycle Study, should be complied with where applicable.

### **Commercial/Industrial developments**

We recommend that all new non-residential development of 1000sqm gross floor area or more should meet the BREEAM 'excellent' or the latest equivalent standards for water consumption.

We trust this advice is useful.

Yours sincerely



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