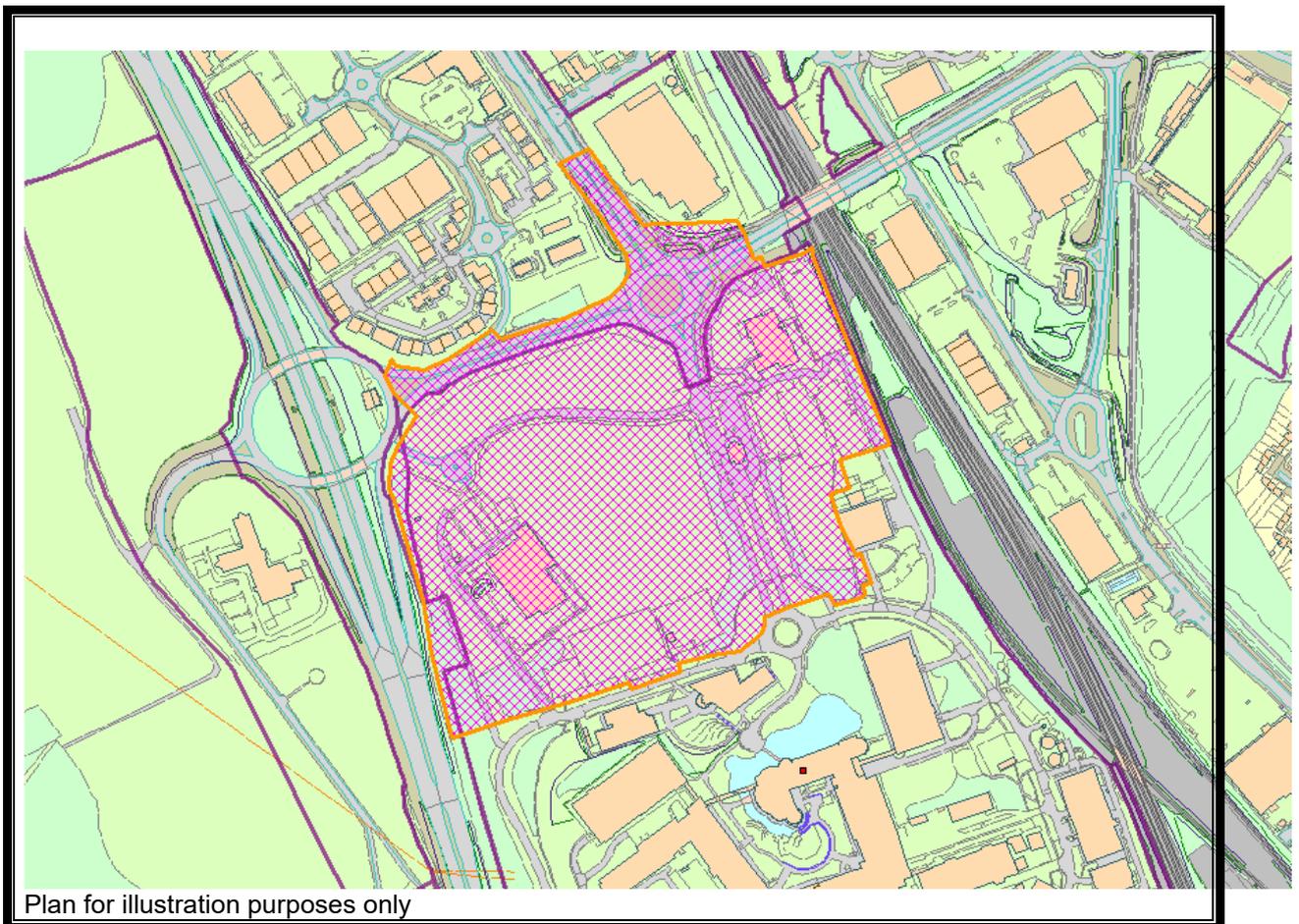




Outline	<p>SEQ-HBA-B4-00-DR-A-082100 Rev C01; SEQ-HBA-B4-01-DR-A-082101 Rev C01; SEQ-HBA-B4-02-DR-A-082102 Rev C01; SEQ-HBA-B4-03-DR-A-082103 Rev C01; SEQ-HBA-B4-04-DR-A-082104 Rev C01; SEQ-HBA-B4-05-DR-A-082105 Rev C01; SEQ-HBA-B4-RF-DR-A-082106 Rev C01; SEQ-HBA-B4-XX-DR-A-082200 Rev C01; SEQ-HBA-B4-XX-DR-A-082201 Rev C01; SEQ-HBA-B4-XX-DR-A-082202 Rev C01; SEQ-HBA-B4-XX-DR-A-082203 Rev C01; SEQ-HBA-B4-XX-DR-A-082300 Rev C01; SEQ-HBA-B4-XX-DR-A-082301 Rev C01</p> <p>SEQ-HBA-D1-00-DR-A-085100 Rev C01; SEQ-HBA-D1-01-DR-A-085101 Rev C01; SEQ-HBA-D1-02-DR-A-085102 Rev C01; SEQ-HBA-D1-RF-DR-A-085103 Rev C01; SEQ-HBA-D1-XX-DR-A-085200 Rev C01; SEQ-HBA-D1-XX-DR-A-085201 Rev C01; SEQ-HBA-D1-XX-DR-A-085202 Rev C01; SEQ-HBA-D1-XX-DR-A-085203 Rev C01; SEQ-HBA-D1-XX-DR-A-085300 Rev C01; SEQ-HBA-D1-XX-DR-A-085301 Rev C01; SEQ-HBA-D1-XX-DR-A-085302 Rev C01</p> <p>SEQ-HBA-D2-00-DR-A-086100 Rev C01; SEQ-HBA-D2-01-DR-A-086101 Rev C01; SEQ-HBA-D2-02-DR-A-086102 Rev C01; SEQ-HBA-D2-RF-DR-A-086103 Rev C01; SEQ-HBA-D2-XX-DR-A-086200 Rev C01; SEQ-HBA-D2-XX-DR-A-086201 Rev C01; SEQ-HBA-D2-XX-DR-A-086202 Rev C01; SEQ-HBA-D2-XX-DR-A-086203 Rev C01; SEQ-HBA-D2-XX-DR-A-086300 Rev C01; SEQ-HBA-D2-XX-DR-A-086301 Rev C01; SEQ-HBA-D2-XX-DR-A-086302 Rev C01; SEQ-HBA-S2-ZZ-DR-A-084100 Rev C01; SEQ-HBA-S2-XX-DR-A-084200 Rev: C01; SEQ-HBA-S2-XX-DR-A-084300 Rev C01</p> <p>SEQ-HBA-S3-ZZ-DR-A-087100 Rev C01; SEQ-HBA-S3-XX-DR-A-087200 Rev C01; SEQ-HBA-S3-XX-DR-A-087300 Rev C01</p> <p>SEQ-HBA-M1-00-DR-A-083100 Rev C01; SEQ-HBA-M1-ZZ-DR-A-083101 Rev C01; SEQ-HBA-M1-ZZ-DR-A-083102 Rev C01; SEQ-HBA-M1-XX-DR-A-083200 Rev C01; SEQ-HBA-M1-XX-DR-A-083201 Rev C01; SEQ-HBA-M1-XX-DR-A-083202 Rev C01; SEQ-HBA-M1-XX-DR-A-083203 Rev C01; SEQ-HBA-M1-XX-DR-A-083300 Rev C01; SEQ-HBA-M1-XX-DR-A-083301 Rev C01</p> <p>SLC-HBA-SS-ZZ-DR-A-080130 P3; SLC-HBA-SS-ZZ-DR-A-080230 P2; SLC-HBA-SS-ZZ-DR-A-080330 P2; 3295-WSP-XX-XX-DR -C-00100-P03 (Rev P03); 3295-WSP-XX-XX-DR-C-00101-P02 (Rev P02)</p> <p>SEQ-HBA-SW-ZZ-DR-A-080020 Rev: C01; Ref: SEQ-HBA-SW-ZZ-DR-A-080021 Rev: C01</p>
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Applicant :	Forge Bio Master Nominee 3A Limited and Forge Bio Master Nominee 3B Limited Jointly with Glaxosmithkline Research & Development Ltd
Date Valid :	19 December 2025
Recommendation :	GRANT PLANNING PERMISSION



## 1. SITE DESCRIPTION

- 1.1 The application site is located within the Gunnels Wood Employment Area to the southwest of the town. The site comprises land within the wider extent of the existing GSK Campus, comprising a range of buildings associated with 'life science' research and development. The site is 'brownfield' and previously developed measuring 17.37ha. It is largely vacant, with the existing CTC building located within the west of the site boundary. The CTC building is one of four facilities in the UK for CGT Catapult, which is an independent innovation and technology organisation committed to the advancement of cell and gene therapies.
- 1.2 The site also includes the GSK security building (to be re-located onto the existing Campus under planning permission 23/00249/FP) and sports centre and the temporary Spark building located within the centre of the site. The site also includes areas of existing hardstanding and surface level car parking. There are two satellite parcels of land within the site which are located within the existing GSK Campus that would facilitate smaller scale extensions to existing buildings. The site is accessed from the north via the A602 on Gunnels Wood Road, which is included within the application boundary.
- 1.3 The surrounding area comprises a range of employment and other commercial uses, specifically the GSK Campus which is located to the south. The A1(M) is to the west of the site, including Junction 7 with the A602. Beyond the A1(M) is the Novotel Hotel with the remaining area to the west comprising Knebworth House and agricultural land. To the east of the site is the East Coast Mainline railway, beyond which lies Roebuck Retail Park and Broadwater Retail Park. The wider Gunnels Wood Employment Area is located to the north of the site, beyond the A602.

- 1.4 The site is not located within a Conservation Area and there are no listed buildings or heritage assets associated with the site. The site is located within Flood Zone 1 and therefore has a low risk of fluvial flooding.

## 2. RELEVANT PLANNING HISORY

- 2.1 The site and wider GSK Campus area has been subject to a number of planning applications. The below is a summary of those of relevance to the consideration of this application.
- 2.2 Outline planning permission ref. 05/00621/OP was approved on 7 April 2009 for development to include 60,000m<sup>2</sup> of office floorspace, improvements to means of access and additional 1,200 car parking spaces following the demolition of existing buildings ('2009 Outline'). The 2009 Outline was subject to a S73 application (Ref: 09/00314/FPM) which was approved on 1 March 2010.
- 2.3 The 2009 Outline is of relevance as the application boundary subject to this application is similar to what was previously approved. The application also included a new gyratory arrangement to the existing A602 and Gunnels Wood Road junction, which is also broadly similar to that proposed as part of this application.
- 2.4 An interim roadworks scheme was agreed to enable the occupation of up to 18,600m<sup>2</sup> floor space in advance of the re-shaping and signalisation of the GSK roundabout. The interim roadworks have been constructed. Part of the 18,600m<sup>2</sup> floor space has now been built and detailed planning permission has been granted for most of the remainder (ref. 15/00323/FPM), bringing the total consented floor space to 18,037m<sup>2</sup>.
- 2.5 In May 2023, planning permission was granted under reference 23/00249/FP for the construction of a replacement security lodge to be located within the existing GSK Campus, with associated access, car/cycle parking and landscaping to enable the application site to be redeveloped as proposed.
- 2.6 Planning permission for development at the site was originally granted on 30 May 2024 (ref: 23/00293/FPM) (**'the May 2024 Permission'**).

"Hybrid Planning Application for a new Life Sciences Campus comprising full planning permission for the demolition of existing ancillary buildings, structures, erection of employment floorspace (Classes E(g)(ii) and (iii) and B2, with provision for Class E uses at ground, lower ground and upper ground/mezzanine floors) revised junction arrangement (A602 and Gunnels Wood Road) and alterations to the site layout to include new car parking (including a multi storey car park), internal access and associated works (such as new utilities (including new substation), drainage and infrastructure hard and soft landscaping and introduction of sustainable transport facilities) and outline planning permission for the demolition of existing ancillary buildings/structures, erection of employment floorspace (Classes E(g)(i) to (iii), B2 and B8, with provision for an ancillary auditorium, and Class E uses at ground floor) and Amenity Hub (Classes E and B2), provision of car parking (including multi storey car park(s)) and associated works (such as new access, utilities, drainage, infrastructure and hard and soft landscaping), with all matters reserved for subsequent approval."

- 2.7 On 16 September 2024, a Non Material Amendment application (ref: 24/00618/NMA) was approved by the Planning Authority (**'the September 2024 NMA'**). This amended a number of approved drawings in relation to elements of the site layout and individual buildings, with consequential amendments to relevant conditions. More recently on 19 November 2025 a Non Material Amendment application (ref: 25/00803/NMA) was approved by the LPA (**'the November 2025 NMA'**). This included changes to the wording of a number of conditions and the description of development. The description of development was amended to

include provision for B8 use within the Detailed Area, in addition to that already approved in the Outline Area, and to reflect the fact that more than one substation was included within the approved scheme.

#### *CTC Building*

- 2.8 An application for construction of a research and manufacturing building (Use Class B1) with associated infrastructure was approved on 19 August 2015 (ref: 15/00323/FPM). This building has been constructed and is known as the Catapult Building which would be retained as part of this application. It was subsequently amended by a non-material amendment application and variation of conditions applications.

#### *Spark Building*

- 2.9 This building is a single storey modular laboratory and office building constructed in 2019 which currently supports three growing companies at Stevenage Bioscience Catalyst. An application for its temporary relocation (5 years) was approved under reference 24/00557/FP on 11 October 2024.

### **3. THE CURRENT APPLICATION**

- 3.1 The planning application is submitted under Section 73 of the Town and Country Planning Act 1990, which allows for an application to be submitted for permission for the development of land without complying with conditions subject to which a previous planning permission was granted. It requires that Local Planning Authorities only consider the question of the conditions subject to which permission should be granted.
- 3.2 In January 2023 the High Court ruling in the case of *Armstrong v Secretary of State for Levelling-Up, Housing and Communities* [2023] EWHC 176 clarified the scope of Section 73 applications, in particular that:
- There is nothing in Section 73, or in the TCPA 1990, that limits its application to “minor material amendments” or to amendments which do not involve a “substantial” or “fundamental” variation.
  - Provided an application is limited to non-compliance with a condition (rather than any other part of the permission) it falls within the stated scope of Section 73 of the TCPA 1990.
  - The *Finney* case confirmed that Section 73 cannot be used to vary the operative part of a planning permission. Section 73 cannot be used to vary or impose a condition where the resulting condition would be inherently inconsistent with the operative part of the planning permission as well.
  - Any application under Section 73 will be subject to the necessary procedural requirements for its consideration which, for example, enable representations to be received. It states: “If Parliament had intended the power to restrict its application further (for example to limit it to “minor material” amendments to a condition, or non-fundamental variations to a condition) one would have expected that to be expressed in the language used and it could readily have done so”.

- 3.3 The proposed changes sought in this application, as detailed below, comply with the principles established through the Armstrong case. They comply with the operative part of the Permission and do not seek to alter it.
- 3.4 The application continues to be in 'hybrid' form and seeks detailed planning permission for the initial (Phase 1) suite of works and outline planning permission (with all matters reserved) for the remainder of the Masterplan. The extent of the detailed and outline application areas is shown on Drawing Ref: SEQ-HBA-SW-ZZ-DR-A-080020 REV C01.
- 3.5 A series of changes are proposed to the approved scheme which are intended to reflect changes to the market, in particular the reduction in demand for 'life science' floorspace and increasing demand for data centres. The scheme would still provide for a life science campus with significant life science floorspace included. The changes comprise alterations to the Detailed and Outline Area Boundaries and to the provision of buildings within the Detailed and Outline Areas:

#### *Detailed Area*

- The Detailed Area is increased in size, with changes to the layout of the area.
- Buildings 2 and 4 are to be relocated within the Site, with alterations to their height and combined floorspace.
- The introduction of 2 x Data Centres and associated infrastructure, including a new substation. As a Class B8 Use the provision of the data centres accords with the operative part of the May 2024 Permission, as amended by the November 2025 NMA.
- A new hard and soft landscaping scheme throughout the Detailed Area.
- Increase in height and overall floorspace to multi-storey car park 1 (MSCP1), which will measure 22,352m<sup>2</sup> GIA.
- The surface level car park north of MSCP1 would be split into two surface level car parks (surface car parks 1 & 2).

#### *Outline Area*

- The Outline Area is reduced in size.
- The provision of 5 x life science buildings (comprising Buildings 1, 3, 5, 6 and provision for an extension to the CTC building).
- The provision of 1 x multi-storey car park (MSCP2), where previously 2 x multistorey car parks were proposed in the outline area.
- The parameters and design principles for the buildings in the Outline Area have been amended but are based on the previously approved parameters. These are detailed in the Masterplan Design Code.
- The landscape principles for the Outline Area follow the principles established for the May 2024 Permission. These are set out in the Landscape Design Code.

3.6 Changes to the quantum of floorspace within each of the Detailed and Outline Areas, set out in Table 1, below, demonstrate a slight reduction in the overall floorspace across the detailed and outline areas.

**Table 1 – Comparison of Approved and Proposed Floorspace**

<b>Employment Buildings</b>	<b>Approved (sq m GIA)</b>	<b>Proposed (sq m GIA)</b>	<b>Difference (+ / -)</b>
Detailed Area - Buildings 2 & 4	23,692	34,703	+11,011
Detailed Area – Data Centres		31,467	+31,467
Outline Area	126,387	83,823	-42,564
<b>Total Floorspace</b>	<b>150,079</b>	<b>149,993</b>	<b>-86</b>

Note: excludes multi-storey car parks

3.7 No alterations are proposed to the layout of the approved Gyratory, or the approved substation within the detailed area in the eastern part of the Site. That substation is however referred to as substation 1 within the submitted documentation.

3.8 The changes would not involve a deed of variation to the s106 agreement, and the original planning obligations still stand.

*Condition Amendments*

3.9 Arising from the above changes, there are a number of proposed amendments to conditions, which are set out in the submitted Condition Amendments Schedule. These include:

- Alterations to a number of document and drawing references, to refer the relevant new document / drawing submitted with this application.
- Alterations to the wording of a number of conditions to refer for consistency with the revised scheme.
- Amendments to wording of a number of conditions to allow partial discharge and occupation of individual buildings.
- Deletion of Condition 16 as Travel Plan(s) requirements are contained within the S106 Agreement dated 30 May 2024.
- Amendments to the habitat units required to be delivered under Condition 31, to reflect the revised Biodiversity Net Gain Assessment, and that provision for an offsetting payment is included within the S106 Agreement pursuant to the May 2024 Permission.
- Deletion of Condition 32, as the requirements under this condition are already required under Condition 31.
- Additional condition 54 covering the testing of any back-up power, life safety and standby power generators.

3.10 The application proposal has gone through a pre-application process with the Local Planning Authority, which has resulted in improvements to the scheme. Pre-application discussions have also been held with Hertfordshire County Council (HCC) as Lead Local Flood Authority.

- 3.11 This application comes before the Planning and Development Committee for its decision as it is a Major.

## 4. DATA CENTRES

- 4.1 Data Centres are specialised physical facilities housing vast amounts of IT infrastructure including servers, storage, and networking gear to store, process, and manage an organisation's critical data and applications, acting as the backbone for digital services like banking, streaming, and cloud computing, with robust support systems for power, cooling, and security. They have evolved from single-company, on-premises rooms to massive, interconnected hubs supporting global digital activity.
- 4.2 The applicant advises the introduction of data centres to the Elevate Quarter has been driven by the rapid integration of artificial intelligence (AI) into the life sciences sector, which has accelerated drug discovery and personalised medicine, necessitating enhanced data processing and storage solutions. Data centres are pivotal in managing the vast amounts of data generated by life sciences research. They provide the necessary infrastructure for high performance computing, secure data storage, and real-time analytics. The surge in AI applications within the sector has further amplified the need for advanced data centre capabilities.
- 4.3 The co-location of data centres on the life sciences campus would allow Stevenage to sit at the forefront of life science innovation in the UK, future proofing the cluster as technological needs expand over time. The centres would facilitate the research occurring at the campus by providing access to high-quality processing power. This may be particularly beneficial for smaller firms who rely on offsite computing support.
- 4.4 These co-location benefits would extend beyond the companies at the campus. Any Stevenage company, or company from further afield, that is looking to utilise high processing power would be able to capitalise on the opportunity of this data centre provision. This would mean the benefits of the scheme would be felt across other industries, indirectly supporting further innovation and economic benefits beyond life sciences alone. Overall, the amendments to the scheme would make the proposals more robust to future market changes, whilst directly supporting the life sciences innovation campus and ensuring a wide range of firms and industries have the opportunity to drive innovation and benefits.
- 4.5 The Government has recently recognised the importance of Data Centres to the UK economy through their inclusion into the Nationally Significant Infrastructure Project (NSIP) consenting regime under section 35 of the 2008 Planning Act on 8 January 2026. This allows the Secretary of State to direct proposals considered to be nationally significant to be determined under the Development Consent Order process, instead of local planning permission(s) to ensure greater strategic oversight and a faster, more streamlined determination process.
- 4.6 In a Written Ministerial Statement dated 12 September 2024, the Minister of State for Data Protection and Telecoms recognised the importance of data centres:

*Data infrastructure - the physical data centres and cloud infrastructure which provide the foundations of the digital economy - faces significant risks and challenges that threaten the day-to-day lives of citizens and other critical infrastructure in the UK. We are today taking a significant step to meet these challenges by designating UK data infrastructure as Critical*

*National Infrastructure (CNI), putting our digital foundations in the same category as Energy and Water.*

*Data infrastructure underpins essential services that are critical to the UK economy and our way of life and will only become more vital as technologies like AI require greater data centre and cloud capacity. The data it contains is highly valuable, and as such attracts security threats from cyber and physical attacks. Data centres are also vulnerable to the effects of climate change, which is increasing the risk of environmental hazards like flooding, heatwaves, and other extreme weather that can disrupt operations and result in a compromise or loss of crucial services.*

*Although the sector already has high standards, CNI designation enables better mitigation of risks the sector faces through an improvement to the Government's visibility and engagement with the data centre and cloud service industry. It signals the Government's intention to better partner with the UK's data infrastructure sector to work together to mitigate these. We will also explore further how to ensure the right conditions are in place to drive necessary capacity expansion to support economic growth and innovation.*

*As the Department responsible for monitoring, protecting and enhancing the security and resilience of data infrastructure, DSIT will be working to better understand industry operators' existing risk mitigations and identify areas for Government support. Data infrastructure will be managed under existing cross-Government CNI structures led by the Cabinet Office, as a sub-sector of Communications. We will work closely in a joined-up approach with internal colleagues, other Government Departments and their respective CNI sectors, such as Energy and Water, contributing to cross-sector work and planning.*

*I am confident that these measures, taken together and implemented in close consultation with industry, will provide a high level of security and resilience for this increasingly critical infrastructure, giving confidence to the public and investors, and supporting the growth of the UK economy.*

- 4.7 The above commitment from the Government recognising the importance of data centres as nationally significant infrastructure and the role they play in the day-to-day lives of citizens, other critical UK infrastructure and the economy gives significant weight to justifying their inclusion within Stevenage's Elevate Quarter life science campus and the wider region.

#### *Economic Benefits*

- 4.8 The application is accompanied by an updated Economic Statement which highlights the importance of data centres and the life science sector to the UK economy. In terms of direct economic benefits to Stevenage and Hertfordshire more widely, the proposal would:
- Overall, the construction phase would deliver 2,250 total job years in the detailed element and 3,940 total job years in the outline element. This would be supplemented by indirect benefits such as construction worker expenditure.
  - In terms of the operational phase, the proposed development is expected to support approximately 4,050-4,170 FTEs. This equates to approximately 4,375 - 4,510 jobs once part-time working patterns are accounted for. Of these, 1,400 FTEs (1,500 jobs) would be at the detailed elements of the scheme, with the rest of the employment supported in the outline elements. After accounting for the existing employment on site, the direct employment supported by the proposed development would represent an uplift of 4,020 -

4,140 gross additional FTEs (4,340 - 4,475 jobs). This would be supplemented by indirect benefits such as worker expenditure.

- An additional output in gross value added (GVA) terms of an estimated £193m – £199m per annum. Gross Value Added (GVA) is a measure of the economic value produced by the activity in a given area.
- An additional estimated tax revenue of £58m – £80m per annum.
- A total of £10.9m in annual business rate payments per annum, of which approximately £4.4m is expected to be retained by the Council.
- The proposal includes several open spaces and landscaped areas which would be open to the public. This is a significant public benefit and encourages a positive relationship between the Campus and local residents.
- The proposal would significantly exceed the minimum target for employment floorspace for this allocated employment site (50,000m<sup>2</sup>) set out within Local Plan policy EC1.

## **5. PUBLIC REPRESENTATIONS**

- 5.1 As a major planning application, the proposal has been publicised by way of two site notices and a press notice. In addition, neighbouring properties have been consulted by way of letter. At the time of drafting this report, no comments have been received either in support or against the proposal.
- 5.2 Please note that a verbatim copy of all comments and representations received are available to view on the Council's website.

## **6. CONSULTATIONS**

- 6.1 The following section contains summaries of consultation responses. Full copies of the responses are available on the Council's website.

### **6.2 HCC Highway Authority**

- 6.2.1 No comments received. With regards to the 'May 2024 Permission', Hertfordshire County Council as Highway Authority did not wish to object to planning permission being granted (see section 8.6 of this report which considers highway implications of this development), but raised a number of planning conditions and obligations (see section 10 of this report for conditions and obligations). These have been updated where required and carried over to this application.

### **6.3 HCC Growth and Infrastructure Unit**

- 6.3.1 No comments received.

### **6.4 Affinity Water**

- 6.4.1 The Affinity Water supply area is considered by government to be under water stress, and we are aware of the growing number of data centres and their varied water demand. In some cases, developers are requesting high volumes of water that, under our current resource base and network capacity, cannot be accommodated. We ask that you get in

contact with the Developer Services team to discuss your water demand requirements as quickly as possible, to avoid impact to our operations and delays to your development.

- 6.4.2 We have reviewed the planning application documents, and we can confirm that the site is not located within an Environment Agency defined groundwater Source Protection Zone (SPZ) or close to our abstractions. The construction works and operation of the proposed development site should be done in accordance with the relevant British Standards and Best Management Practices, thereby significantly reducing the groundwater pollution risk. It should be noted that the construction works may exacerbate any existing pollution. If any pollution is found at the site, then the appropriate monitoring and remediation methods will need to be undertaken. For any works involving excavations below the chalk groundwater table (for example, piling or the implementation of a geothermal open/closed loop system), a ground investigation should first be carried out to identify appropriate techniques and to avoid displacing any shallow contamination to a greater depth, which could impact the chalk aquifer.
- 6.4.3 Being within a water stressed area, we expect that the development includes water efficient fixtures and fittings. Measures such as rainwater harvesting and grey water recycling help the environment by reducing pressure for abstractions. They also minimise potable water use by reducing the amount of potable water used for washing, cleaning and watering gardens. This in turn reduces the carbon emissions associated with treating this water to a standard suitable for drinking and will help in our efforts to get emissions down in the borough.
- 6.4.4 There are potentially water mains running through or near to part of proposed development site. If the development goes ahead as proposed, the applicant/developer will need to get in contact with our Developer Services Team to discuss asset protection or diversionary measures. Due to its location, Affinity Water will supply drinking water to the development in the event that it is constructed. Should planning permission be granted, the applicant is also advised to contact Developer Services as soon as possible regarding supply matters due to the increased demand for water in the area resulting from this development.

## **6.5 Thames Water**

- 6.5.1 No comments received. Raised no objection to May 2024 Permission.

## **6.6 SBC Green Spaces and Ecology**

- 6.6.1 No comments received. Raised no objection to May 2024 Permission.

## **6.7 Network Rail**

- 6.7.1 Does not wish to comment. Raised no objection to May 2024 Permission.

## **6.8 Lead Local Flood Authority**

*Comments dated 21 January 2026*

- 6.8.1 We understand that this is a Section 73 application which proposes a number of changes to the scheme approved under 23/00293/FPM. We object to this planning application in the absence of an acceptable Drainage Strategy relating to:

- Clarification into the side slopes of swales/basins across the development.
- Clarification into the use of deep borehole soakaways in the east of the development.
- The development is not in accordance with NPPF and PPG.

## Reason

6.8.2 To prevent flooding in accordance with National Planning Policy Framework paragraphs 181, 182 and 187 by ensuring the satisfactory management of local flood risk, surface water flow paths, storage and disposal of surface water from the site in a range of rainfall events and ensuring the SuDS proposed operates as designed for the lifetime of the development.

6.8.3 We will consider reviewing this objection if the following issues are adequately addressed.

1. We note that in the West Car Park Catchment, a number of swales and an infiltration basin are proposed. The proposed side slopes for these SuDS features should be clarified – 1 in 4 or shallower is preferred, however 1 in 3 is acceptable.
2. We note that proposed drainage for Catchments P and Q (on the eastern side of the site) remains as per the previously approved strategy within 23/00293/FPM. The proposed strategy involved the use of deep borehole soakaways. The National standards for SuDS now state that the use of deep-bore infiltration features is by exception only and is not considered to follow a SuDS approach. As a result, we seek clarification into whether the use of the deep bore soakaways in Catchment P and Q has been revisited following updates to other parts of the site. Shallow infiltration and a positive connection into a surface water sewer would both be more preferable than the use of deep borehole soakaways.

### *Comments dated 13 February 2026*

6.8.4 We understand that this is a Section 73 application which proposes a number of changes to the scheme approved under 23/00293/FPM. Since our last response, the applicant has submitted a letter to action our comments. We are satisfied with the responses provided and have no objection to this application. We note that we expect that conditions 49, 50, 51, 52 and 53 will be retained as part of this S73 application.

## **6.9 Environment Agency**

6.9.1 We have no objections to the proposed changes. Previously we provided advice relating to the proposed surface water drainage strategy and we welcome that this revised proposal retains the approach that was previously agreed. We do note that the proposal is still reliant on infiltration, including several deep borehole soakaways and that the design has not been finalised. As such, we welcome the proposal to retain Condition 48 (surface water drainage).

6.9.2 We would like to highlight that borehole soakaways should only be utilised where no other options for surface water discharge exist as they can provide preferential pathways for contaminants to enter groundwater (that is sensitive in this area) and as such additional pollution prevention mitigations may be required. Additional assessment is required to demonstrate that borehole soakaways are feasible at this site and can be adopted and maintained and will not result in other environmental problems.

6.9.3 With respect to potential land contamination, we also welcome the proposal to retain Condition 37 (unexpected contamination). We look forward to being consulted on the discharge of Conditions 37 (unexpected contamination) and Condition 48 (surface water drainage) when the applicant submits details to discharge them. We have no comments relating to the variation proposed for other conditions as they relate to matters outside our remit.

## **6.10 HCC Minerals and Waste**

6.10.1 No comments received. Raised no objection to May 2024 Permission.

**6.11 SBC Environmental Health**  
Comments dated 12 January 2026

6.11.1 Thank you for consulting the Environmental Health & Licensing Service (EH&LS) regarding the above. This is clearly a complex proposed development based on an earlier planning determination and therefore I have restricted my review of this case to the following Environmental Health matters vis-a-vis the additional/different aspects of the new scheme:

*Local air quality*

6.11.2 The Air Quality Assessment - Stevenage Elevate Quarter report by DustScanAQ (reference ZGTEQ\_AQA, Revision A, dated 17/12/2025) states that the revised scheme will result in significantly less vehicle emissions than the existing authorised development and therefore the report focuses on the emissions from the proposed 47 Internal Combustion Engine (ICE) generators which are mostly associated with the proposed new data centres. The report concludes that the emissions from these generators will not have a material impact on existing local air quality – a conclusion I believe is reasonable given the assessment approach employed. However, this conclusion is based on a number of key assumptions set out in section 3.1.2., i.e. that the ICE units will have Selective Catalytic Reduction (SCR) abatement equipment fitted and that their hours of operation will be very limited and relate only to the testing and back-up operations only.

6.11.3 There is no proposed condition relating to these assumptions and therefore I am concerned that this would permit unmitigated plant to be installed and operated for extended periods without an appropriate Local Planning Authority (LPA) control. I would therefore suggest that the LPA discusses this aspect of the revised scheme with the applicant with view to securing an additional condition that safeguards the environment in accordance with Local Plan Policy FP7.

*Environmental noise*

6.11.4 The Planning noise report authored by Sandy Brown Ltd. (reference 23023-R06-B, Version B, dated 15/12/2025) utilises a computer model to predict sound pressure levels arising from the proposed development at relevant receptor locations off-site. Whilst this is common practice, this approach does not permit auditing of the results by EH&LS; this is particularly relevant regarding the model input information concerning the hours of operation and duration of the ICE generators which are suggested, in the application, to be mostly restricted to the day (for testing) and for a duration of no more than 78 hours (in the event of a mains power outage). Accordingly, I cannot advise the LPA on the sensitivity, or otherwise, of the noise predictions associated with the use of the ICE plant beyond their pattern of proposed use.

6.11.5 The report's conclusions are based, in part, on assumptions such as the façade construction of the data centres (which are illustrated in Drawing No. SEQ-HBA-D1-XX-DR-A-085302 for example) and that some of the ICE generators will be housing within enclosures which will mitigate their liberation of noise (these are not so clearly illustrated, as far as I can appreciate, on specific plans or elevations associated with the data centres). The report states that the specification of some of the equipment, e.g. back-up ICE plant flues, have yet to be finalised and that further noise mitigation measures may therefore be warranted.

6.11.6 In light of the above, I would ordinarily expect that a report of this nature would provide a commentary on uncertainty – something which the Sandy Brown Ltd. report does not appear to do. Given the complexity of the proposals and stage of plant design, this is disappointing and creates some doubt as to the reliability of the criteria-based approach offered in the report (see below) and, by implication, the proposed planning condition.

- 6.11.7 The noise criteria proposed in paragraph 8.3.3. appear to be largely based on the methodology set out in BS4142 but without citing the usual terminology such as the Rating Level of the noise under consideration. This is significant in my opinion as character adjustments regarding tonality, intermittency, etc., of plant/equipment noise could well be pertinent to this application given that the ICE plant will operate intermittently and that no data has been offered concerning its tonality. The final criteria proposed (relating to the accumulative noise impact being no greater than 10 dB above background noise levels) could be interpreted to equate to an ‘...indication of a significant adverse impact...’ according to guidance set out in BS4142 and therefore would rather indicate non-conformity with Local Plan Policy FP7.
- 6.11.8 Accordingly, I have significant doubts that the above criteria can be reliably used as planning conditions (or the basis of the condition actually offered – no. 40) as suggested in Section 10 of the report. I would encourage the LPA to contact the applicant with view to securing the redrafting of condition 40 to reflect the observations above. I believe that it would be reasonable to delineate the controls between the data centre-related plant and other equipment noise sources on the site; the former may be best managed by way of a noise management plan.

#### *Artificial lighting*

- 6.11.9 The Exterior Lighting Strategy for Section 73 Planning Application report prepared by FPOV (reference J4431-SL-5101-02, dated 12/12/2025) correctly, in my view, makes reference to an appropriate environmental lighting guidance document - ‘Guidelines for the reduction of obtrusive light’ published by the Institution of Lighting Professionals (ILP). However, integral to the ILP guidance is the classification of the development site in terms of the pertinent environment lighting zone (‘...It is recommended that Local Planning Authorities specify the following environmental zones for exterior lighting control...’) – this appears to be absent from the FPOV report and therefore it is difficult for me to advise the LPA on whether the proposed lighting strategy will, or will not, exceed appropriate lighting levels as recommended in the ILP guidance. Accordingly, I do not believe that the proposed revised Condition 42 is currently fit for purpose and recommend that clarification on this point is secured from the applicant and/or their technical advisors.

#### *Contaminated land*

- 6.11.10 The existing conditions (36 and 37) relating to soil contamination remain appropriate in my view and therefore I have no objection to their continued use as regards the revised proposals.
- 6.11.11 In conclusion, I believe that the development of the GSK Campus site, as broadly proposed in this application, can comply with Local Plan Policy FP7 subject to the inclusion of suitable and sufficient mitigation/control measures. The two data centres do introduce some additional risks as regards the protection of local amenity/the environment and so I would advise that the controls regarding these need to be carefully thought through.

#### Comments dated 16 February 2026

- 6.11.12 Further to my memorandum of 12/1/2026 I have reviewed the correspondence with the Local Planning Authority (LPA) regarding this application and provide the following updated guidance:

#### *Artificial lighting*

- 6.11.13 The revised Exterior Lighting Strategy for Section 73 Planning Application report prepared by FPOV (reference J4431-SL-5101-03, dated 16/1/2026) provides welcome clarifications regarding the ILP lighting zone classification and scheme design objectives (see page 7).

Accordingly, I believe that the following revised Condition 42 (modified only to reflect the amended report reference) is appropriate:

*The development to which this permission relates in respect of the Detailed Area and each Development Zone as agreed pursuant to condition 4, shall be carried out in accordance with the recommendations set out within the Exterior Lighting Strategy by FPOV (ref: J4431-SL-5101-03, January 2026) as approved or any alternatives to be submitted to and approved by the Local Planning Authority.*

*Local air quality*

6.11.14 I understand that the applicant has suggested the following, additional, planning condition:

*Testing of any back-up power, life safety and standby power generators shall only be undertaken in accordance with the scenarios set out in paragraph 3.1.2 of the Air Quality Assessment dated December 2025 or any alternatives to be submitted and approved by the Local Planning Authority. Generators shall otherwise only be used in emergency situations. Data Centre back-up power generators shall incorporate Selective Catalytic Reduction.*

6.11.15 I welcome this additional safeguard and encourage its use by the LPA should it be minded to approve this application.

*Environmental noise*

6.11.16 I welcome the disaggregation of the proposed noise limits, particularly as regards the emergency back-up generators, for the reasons set out in my earlier memorandum. However, my reservations regarding the following remain:

- Other than the new condition regarding air quality, above, there is no cited control when testing of the generators should take place or that they should only be used in emergency situations
- The proposed noise limit condition for the generators does not reflect BS 4142 nomenclature, i.e. a Rating Level
- I'm not sure why the Rating Levels relating to the third bullet point contains multiple question marks

6.11.17 I would advise the LPA against anchoring, indefinitely, noise limits to a stated background noise level as this is likely to change over time. The proposed conditions apply this principle regarding the back-up generators, but not to the ordinary operation of plant and so I would recommend a consistent approach.

Comments dated 2 March 2026

6.11.18 Further to my memoranda of 12/1/2026 and 16/2/2026, I have participated in discussions and correspondence with the applicant's planning and noise advisors as regards the proposed development's conformity with Local Plan Policy FP7 and provide the following update:

*Local air quality*

6.11.19 I understand that the following condition has been offered in connection with local air quality matters:

54. *Testing of any back-up power, life safety and standby power generators shall only be undertaken in accordance with the scenarios set out in paragraph 3.1.2 of the Air Quality Assessment dated December 2025 or any alternatives to be submitted and approved by the Local Planning Authority. Testing of back-up generators shall only*

*be undertaken between the hours of 07:00-23:00. Generators shall otherwise only be used in emergency situations. Data Centre back-up power generators shall incorporate Selective Catalytic Reduction.*

6.11.20 This condition resolves my concern regarding the incorporation of necessary mitigation measures as regards the release of products of combustion; I believe that it also provides some comfort in connection with the proposed testing regime associated with back-up power systems, et al, from an environmental noise perspective.

#### *Environmental Noise*

6.11.21 The development proposals set out in this application represent a significant increase in risk, as regards the impact of noise on local amenity, over the currently authorised scheme – this is largely due to the inclusion of two data centres that will entail a considerable number of noise sources (e.g. 192 air handling units and 40 back-up ICE generators). Clearly, the contents of Local Plan Policy FP7 are engaged by this aspect of the proposed development and therefore I have had careful regard to the assessment of these noise sources.

6.11.22 To complicate matters, the noise climate around the development site is by no means straightforward – it is characterized by a number of transport sources – the A1(M), local road network, railway lines, and London Luton Airport overflights; there are also a considerable number of commercial activities in the area. Mostly recently an additional technical document has been provided to me by Sandy Brown Ltd. (reference M011-A, dated 27/2/2026) and also the following conditions have been proposed:

*40. The cumulative rating sound level from all building services plant (excluding back-up generators and life safety systems) serving the development shall not exceed LAr,Tr 54 dB during the day (07:00-23:00) and LAr,Tr 46 dB at night (23:00-07:00) at the residential dwellings to the east, and a level of LAr,Tr 65 dB during the day (07:00-23:00) and LAr,Tr 57 dB at night (23:00-07:00) at the hotel to the west. The cumulative rating sound level of all life safety systems serving the development shall not exceed LAr,Tr 56 dB at the residential dwellings to the east, and a level of LAr,Tr 67 dB at night (23:00-07:00) at the hotel to the west.*

*In addition to the above, in relation to the data centres:*

- Cumulative noise associated with building services plant (excluding back-up generators and life safety systems) serving the data centres shall not exceed LAr,Tr 48 dB during the day (07:00-23:00) and LAr,Tr 40 dB at night (23:00-07:00) at the residential dwellings to the east, and a level of LAr,Tr 59 dB during the day (07:00-23:00) and LAr,Tr 51 dB at night (23:00-07:00) at the hotel to the west.*
- Cumulative noise associated with the data centres whilst the backup generators are operational should not exceed LAr,Tr 54 dB during the day (07:00-23:00) and LAr,Tr 46 dB at night (23:00-07:00) at the residential dwellings to the east, and a level of LAr,Tr 65 dB during the day (07:00-23:00) and LAr,Tr 57 dB at night (23:00-07:00) at the hotel to the west.*
- Prior to first occupation of each data centre a noise impact assessment or equivalent report shall be submitted in writing and approved by the local planning authority, demonstrating that the installed plant serving data centres comply with the limits presented above.*

6.11.24 I have considered the totality of the acoustic information submitted to date in connection with this application, including the Planning noise report authored by Sandy Brown Ltd. (reference 23023-R06-B, Version B, dated 15/12/2025). I would advise the LPA that the proposals contained within application 25/00893/FPM need not materially degrade local amenity due to the release of noise from the development. This conclusion is based on the

proposed utilisation of a comprehensive set noise mitigation measures, both technical and managerial, some of which have yet to be finalised.

- 6.11.25 The guidance used by the applicant's acoustic advisor ('BS 4142:2014+A1:2019 – Methods for Rating and Assessing Industrial and Commercial Sound') to inform the selection of plant (and other design considerations) is appropriate under the circumstances. NB: the standard is not simply a numerical model seeking to equate plant noise to a prevailing background noise climate, it requires that an assessment reflects local circumstances, characterises of the noise in question, and is therefore contextual in nature.
- 6.11.26 The proposed conditions set out the maximum noise levels associated with a number of scenarios and at two principal receptor locations. If delivered in practice, these levels should not cause undue disturbance to existing occupiers. However, I am concerned that these conditions do not represent a workable means of controlling noise from the proposed development post-implementation as it will be difficult to establish the precise source of each noise (and its categorisation, e.g. pertaining to a 'life safety system') given the complexity of scheme, the existing operation of the GSK site, the uncertainty associated with establishing a presentative background noise level, etc. I fear that these issues render the proposed conditions potentially unenforceable (thereby failing the fourth test set out in Paragraph 55 National Planning Policy Framework). Also, I am mindful of the *Coventry v. Lawrence* 2014 Supreme Court judgement regarding the possible impact of the decision making of the Local Planning Authority on the subsequent determination of common law nuisance (and hence the regulatory role of the Council as regards Part III of the Environmental Protection Act 1990). Accordingly, I counsel the LPA from the direct use of the proposed conditions.
- 6.11.27 Given the peculiarities of the proposed development and its location I would recommend a more iterative mechanism of ensuring that local amenity is safeguarded going forward. This approach would have the advantage of reducing implementation risk as a number of assumptions implicit to the Sandy Brown Limited's assessment, such the selection of mitigation plant, will be clarified as the design process progresses; also, I understand that a phased approach to the development will be utilised – this will enable real world data to be collected and used in the design of subsequent phases. From a regulatory point of view, in the event of a noise complaint to the Council, its obligations set out in the Environmental Protection Act 190 would also be more able to be discharged.
- 6.11.28 In light of the above I suggest the following condition:
40. *Before any item of plant or machinery is used in connection with the data centres hereby approved, it shall be installed and operated in accordance with a written scheme first agreed in writing with the Local Planning Authority. The scheme shall set out measures both technical and managerial that will limit the acoustic impact of the plant and/or machinery so that its Rating Level does not exceed those values set out in Planning noise report authored by Sandy Brown Ltd. (reference 23023-R06-B, Version B, dated 15/12/2025 and addendum note reference M011-A, dated 27/2/2026) as assessed within the curtilage of any dwelling or other noise sensitive receptor having regard to the definitions and assessment approach set out in British Standard BS4142: 2014 + A1: 2019.*
- 6.11.29 Notwithstanding the above, I would reiterate my recommendation as regards the inclusion of the following Informatives:

The applicant is advised of the Council's powers under Part III of the Environmental Protection Act 1990 to prohibit nuisances associated with noise, odour, dust, artificial light and a range of other pollutants that may arise from both demolition/construction sites and ongoing commercial/industrial land uses.

The applicant is advised of the Council's powers under the Control of Pollution Act 1974 to restrict noise generating construction (including demolition) activity audible beyond the development site boundary.

## **6.12 National Highways**

6.12.1 We are satisfied that the proposal would not materially affect the safety, reliability and/or operation of the strategic road network. As such, National Highways would offer no objection.

## **6.13 Natural England**

6.13.1 No comments received. Raised no objection to May 2024 Permission.

## **6.14 UK Power Networks**

6.14.1 No comments received. Raised no objection to May 2024 Permission.

## **6.15 SBC CCTV Department**

6.15.1 No comments received. Raised no objection to May 2024 Permission.

## **6.16 SBC Highways (Engineers)**

6.16.1 No comments received. Raised no objection to May 2024 Permission.

## **6.17 Crime Prevention**

6.17.1 No comments received. Raised no objection to May 2024 Permission.

## **6.18 HCC Ecology**

6.18.1 No comments received. Raised no objection to May 2024 Permission.

## **6.19 SBC Planning Policy**

6.19.1 No comments received. Raised no objection to May 2024 Permission.

## **6.20 SBC Arboriculture and Conservation Manager**

6.20.1 No objection. Raised no objection to May 2024 Permission.

## **6.21 Hertfordshire Fire and Rescue (Fire Hydrants)**

6.21.1 Hertfordshire Fire and Rescue service (hydrants only) will require a condition for the provision and installation of fire hydrants, at no cost to the county council, or fire and rescue service. This is to ensure there are adequate water supplies available for use in an emergency, at all times.

## **6.22 Hertfordshire LEADS (Archaeology)**

6.22.1 No comments received. Raised no objection to May 2024 Permission.

## **6.23 Active Travel England**

6.23.1 ATE recommends approval of the application, subject to the agreement and implementation of planning conditions and/or obligations as set out in this response.

## **7. RELEVANT PLANNING POLICIES**

### **7.1 National Planning Policy Framework**

- 7.1.1 The latest revision of the NPPF was published in December 2024. The policies it contains are material considerations which will be taken into account in dealing with applications. Due weight will be given to development plan policies according to their degree of consistency with the NPPF.
- 7.1.2 The NPPF provides that proposals which accord with an up-to-date development plan should be approved without delay (para.11) and that where a planning application conflicts with an up-to-date development plan, permission should not usually be granted (para.12). This indicates the weight which should be given to an up-to-date development plan, reflecting the requirements of section 38(6) of the 2004 Act.

### **7.2 Planning Practice Guidance**

- 7.2.1 The Planning Practice Guidance (“PPG”) is an online resource containing guidance supplementing the NPPF. The PPG is a material consideration which should be taken into account in determining planning applications.

### **7.3 National Design Guide**

- 7.3.1 The National Design Guide 2019 is Government guidance on the characteristics of well-designed places and demonstrates what good design means in practice. It has the same status as the PPG and should similarly be taken into account when determining planning applications.

### **7.4 The Development Plan**

- 7.4.1 Section 38(6) of the Planning and Compulsory Purchase Act 2004 requires that planning applications be determined in accordance with the development plan unless material considerations indicate otherwise. For Stevenage, the development plan comprises the following documents:

- Stevenage Borough Local Plan 2011-2031
- Waste Core Strategy & Development Management Policies DPD 2011-2026
- Waste Site Allocations DPD 2011-2026
- Minerals Local Plan Review 2002-2016

- 7.4.2 The Stevenage Borough Local Plan 2011-2031 was adopted in 2019. The council concluded a full review of the plan in 2024, as required by regulation 10A of the Town and Country Planning (Local Planning) (England) Regulations 2012 (as amended).

- 7.4.3 In response to the review, the council is carrying out a partial update of the local plan. The updated plan was examined in December 2025 and consultation on the Main Modifications is open until 31 March 2026. Weight will be given to emerging policies according to:

- a) the stage of preparation of the emerging plan;
- b) the extent to which there are unresolved objections to the policies; and
- c) the degree of consistency between the policies and the most recent revision of the NPPF.

- 7.4.4 In determining applications, regard will be had to other material considerations, including (but not limited to):

- The Planning Practice Guidance;
- The National Design Guide;
- Written ministerial statements and directions;
- Guidance published by Hertfordshire County Council;
- Stevenage Borough Council supplementary planning documents.

7.4.5 Where there are emerging policies which are relevant to the application, these will be highlighted in the main body of this report. The policies set out below are most relevant in the determination of this application:

Policy SP1: Presumption in favour of sustainable development  
 Policy SP2: Sustainable development in Stevenage  
 Policy SP3: A strong, competitive economy  
 Policy SP5: Infrastructure  
 Policy SP6: Sustainable transport  
 Policy SP8: Good design  
 Policy SP11: Climate change, flooding and pollution  
 Policy SP12: Green infrastructure and the natural environment  
 Policy SP13: The historic environment  
 Policy EC1: Allocated sites for employment development  
 Policy EC2a: Gunnels Wood Employment Area  
 Policy EC5: Active frontages and gateways  
 Policy IT4: Transport Assessment and Travel Plans  
 Policy IT5: Parking and access  
 Policy IT6: Sustainable Transport  
 Policy IT7: New and Improved Links for Pedestrians and Cyclists  
 Policy GD1: High quality design  
 Policy FP1: Climate change  
 Policy FP2: Flood risk in Flood Zone 1  
 Policy FP5: Contaminated land  
 Policy FP6: Hazardous Installations  
 Policy FP7: Pollution  
 Policy NH5: Trees and Woodland

## **7.5 Supplementary Planning Documents**

7.5.1 The following supplementary planning documents are relevant to determining the application:

Parking Provision SPD (2025)  
 Design Guide SPD (2025)  
 Developer Contributions SPD (2025)

## **7.6 Community Infrastructure Levy Charging Schedule**

7.6.1 Stevenage Borough Council adopted a Community Infrastructure Levy Charging Schedule in 2020. This allows the Council to collect a levy to fund infrastructure projects based on the type, location and floorspace of a development. As the laboratory buildings would fall within planning use class E – commercial, business and service use, which is the same use class as retail, this proposal would be CIL liable at £60/m<sup>2</sup>. However, it is recognised that the buildings would not be in retail use, but research and development Classes E(g)(ii) and (iii), with some B2/B8 (general industry/storage and distribution) and therefore would be liable for CIL at £0m<sup>2</sup> as 'other development' under the CIL charging schedule.

## **8. APPRAISAL**

- 8.1.1 The main issues for consideration in the determination of this application are its acceptability in land use and policy terms, design, impact on the setting of nearby designated heritage assets, flood risk and drainage, climate change mitigation, amenity, air quality, noise, highway impact and sustainable travel, access and parking, trees, biodiversity and landscaping and planning obligations to mitigate the impact of the development.
- 8.1.2 Section 38(6) of the Planning and Compulsory Purchase Act (2004) requires that all planning applications must be determined in accordance with the Development Plan unless material considerations indicate otherwise.

### **8.2 Land Use Policy Considerations**

- 8.2.1 The underlying principle of the development of the site has already been established through the May 2024 Permission (as amended). This establishes the principle of the development of circa 150,000m<sup>2</sup> of employment floorspace at the site within Use Classes E(g), B2 and B8, along with associated development. As set out above, the changes to the scheme accord with the operative part of the May 2024 Permission (as amended). Adopted Local Plan Policy EC1 allocates sites within the Borough for strategic employment development and EC1/1 specifically identifies the site as 'Stevenage GSK and Bioscience Catalyst Campus' for B1(b) and (c)1 uses. The policy includes provision for primary use of the site within Classes B1(b) and B1(c) but explicitly supports ancillary uses. Policy EC1 set a target floorspace for the site of 50,000m<sup>2</sup> but also states that proposals should 'meet or exceed' the target area.
- 8.2.2 The proposed development would continue to provide for a significant quantum of employment floorspace within the former B1 use classes (now Use Class E), with 118,526m<sup>2</sup> GIA of floorspace, significantly above the target floorspace under Local Plan Policy EC1. As set out in Table 1 above, the quantum of employment floorspace proposed across the site is slightly below that of the approved scheme. This employment allocation has not changed as part of the Local Plan Review and therefore Policy EC1 with reference to the Stevenage GSK and Bioscience Catalyst Campus still carries significant weight.
- 8.2.3 The applicant is willing to accept a condition which would limit the overall quantum of floorspace for use within Class E(a) retail and on specific sub-sectors. For example, a maximum cap of 500m<sup>2</sup> is proposed for use of floorspace as 'retail' within Class E(a). It is considered such a condition would be necessary to restrict the proposed quantum of Class E floorspace on the site (other than E(g)) to ensure the proposal complies with Local Plan employment policies SP3 and EC1.
- 8.2.4 Subject to this, it is considered the principle of a new Life Sciences Campus in the manner proposed on the site is acceptable in land use policy terms, subject to satisfying design, transport and environmental policies.

### **8.3 Design, Layout and Visual Impact**

#### *National Planning Policy Framework and Planning Practice Guidance*

- 8.3.1 Chapter 12 Achieving well-designed places of the NPPF (2024) stipulates that the creation of high quality, sustainable buildings and places is fundamental to what the planning and development process should achieve. Good design is a key aspect of sustainable development, creates better places in which to live and work and helps make development acceptable to communities. Being clear about design expectations, and how these will be tested, is essential for achieving this. So too is effective engagement between applicants,

communities, local planning authorities and other interests throughout the process. Where development is not well designed, permission should be refused.

8.3.2 The NPPF sets out at Paragraph 140 that local planning authorities should seek to ensure that the quality of approved development is not materially diminished between permission and completion, as a result of changes being made to the permitted scheme.

8.3.3 The National Design Guide 2019, which was published by the Government, is a material consideration in the determination of planning applications. It states that buildings are an important component of places and proposals for built development are a focus of the development management system. However, good design involves careful attention to other important components of places. These include:

- the context for places and buildings;
- hard and soft landscape;
- technical infrastructure – transport, utilities, services such as drainage; and
- social infrastructure – social, commercial, leisure uses and activities.

8.3.4 A well-designed place is unlikely to be achieved by focusing only on the appearance, materials and detailing of buildings. It comes about through making the right choices at all levels, including:

- the layout;
- the form and scale of buildings;
- their appearance;
- landscape;
- materials; and
- their detailing.

#### Development Plan

8.3.5 Policy SP8 generally reflects the requirements of the NPPF in that it requires new development to achieve the highest standards of design and sustainability. In addition, Policy GD1 generally requires all forms of development to meet a high standard of design which includes form of built development, elevational treatment and materials along with how the development would integrate with the urban fabric, its relationship between buildings, landscape design and relevant aspects of sustainable design.

8.3.6 In the emerging local plan review and partial update, criterion (e) of Policy GD1 is updated to refer to “unacceptable” adverse impacts. The intention behind the change is to make clear that in some circumstances, an adverse impact might still fall within acceptable bounds and that this is a matter of judgement for the decision maker. Policy GD2 is a new policy emerging from the local plan review and partial update. It states that proposals which demonstrate they have been designed to achieve a rating of excellent or higher against the relevant BREEAM standard will be strongly supported. Having regard to paragraph 49 of the NPPF, this emerging version of the policy is afforded significant weight in the assessment of the application.

8.3.7 The proposal has gone through a pre-application process with both the Local Planning Authority and HCC as Lead Local Flood Authority, which has resulted in improvements to the scheme. The scheme has been assessed against the key policy criteria on good design, as well as how the scheme meets the four key objectives in the National Design Guide on what is considered to be a well-designed place.

8.3.8 Given the hybrid nature of the application, it includes detailed design of buildings 2 and 4, the data centres, gyratory, substations, MSCP1, surface carparks 1 and 2 and part of the site layout and then provides parameters and design intent for the outline elements.

Included within the application is an Illustrative Masterplan which shows how the entire scheme could be developed, which would be in accordance with the submitted Parameter Plan and the Design Codes for both buildings and landscape, which set the framework for the proposed Campus.

8.3.9 Key design features and principles which would inform and establish the environment at the Campus include:

- Create bespoke buildings and floorspace which connect science and nature
- Setting a series of measurable performance targets to deliver holistic sustainability
- Townscape principles which seek to deliver a successful group of buildings and spaces
- A family of buildings (a connected genealogy of common features) but with diversity of architectural expression; and
- A range of landscape treatments that deliver amenity and establish different character areas across the site.

8.3.10 Local Plan policy EC5 requires active frontages and gateways to be created along key infrastructure routes within the Gunnels Wood Employment Area. The policy sets criteria to help guide development within the area and again, this has helped inform the proposed development and the principles set out within the Design Codes. In particular:

- a) Proposed buildings would face directly onto Gunnels Wood Road and include active frontages and / or feature elevations
- b) The buildings would not be set back from the road and instead would aim to address and establish a clear street frontage
- c) Car parking is proposed primarily within the dedicated MSCPs with dedicated service area created in discreet, secondary frontages. The Campus would not include surface level parking or servicing areas to front directly onto Gunnels Wood Road; and
- d) The tallest, 'landmark' buildings (Buildings 10, 11 and 12) would be sited on the corner plots of the site facing onto Gunnels Wood Road. The Design Code requires the façade treatment of these buildings to respond to their visibility and function as a focal point for the Campus.

8.3.11 There is no change to this policy within the Local Plan Review. The strategic vision for the proposed development is to create a Campus of exemplar design quality. The detailed design of buildings 2 and 4, the data centres, MSCP1, substations and the initial phase of landscaping works (to create the Arrival Plaza and the Forum) would provide a clear indication of the design intent. The quality of design for the subsequent phase(s) included within the outline element would be guaranteed through the updated Design Codes which are provided to guide both the buildings and landscaping. Condition 20 is to be amended accordingly to refer to the revised Masterplan Design Code, subject to planning permission.

#### *Context and Layout*

8.3.12 Amendments are sought to the May 2024 Permission (as amended) to remove 8 of the laboratory buildings, one MSCP, the amenity hub and introduce two new data centre buildings all set within a smaller publicly accessible landscaped science park, comprising The Forum, Arrival Plaza and Gateway Gardens with vehicular and pedestrian access. All other aspects of the previous planning permission would be delivered including the new gyratory.

8.3.13 The buildings would comprise a variety of different uses, including Research and Development laboratories and office buildings, GMP/flexible laboratory buildings, training and innovation buildings, amenity and collaborative spaces together with the data centres. There would be two Green Transport Hubs that would provide multi-storey car parking, cycle parking and potential scooter/e-bike hire. A site layout plan showing which area of the

application site is subject to detailed planning approval and outline approval (with all matters reserved) can be seen in Figure 2 below (drawing ref. SEQ-HBA-SW-ZZ-DR-A-080020 REV C01). An Illustrative Masterplan showing how the site could be developed as a whole is provided in Figure 3 below (drawing ref. 25021-EXA-ZZ-GF-DR-L-00001 REV P01).

- 8.3.14 Laboratory buildings 2 and 4, MSCP1, surface car parks 1 and 2, substations x 2, data centres 1 and 2 and the proposed new A602 / Gunnels Wood Road gyratory all form part of the detailed planning application. The layout of these buildings, areas and gyratory show how the site would be developed should planning permission be granted. The remainder of the site comprising laboratory buildings 1, 3, 5 and 6, MSCP 2 and the existing CTC building form part of the outline application with all matters reserved for future consideration. However, the submitted Parameter Plan (see Figure 4 below, drawing ref. SEQ-HBA-SW-ZZ-DR-A-080021 REV C01) showing the maximum development area and building heights and the Design Codes for both buildings and landscape which set the framework for the proposed Campus, are subject to re-approval and the existing conditions would be updated as part of any outline planning permission.
- 8.3.15 The masterplan has taken a campus approach to the layout of the buildings, which would be set around 'The Forum' providing outdoor amenity and collaboration workspace within a high-quality landscaped setting. Vehicular access would be provided using the existing accesses from the A602 / Gunnels Wood Road roundabout and A602 / J7 A1(M) roundabout leading to new access roads within the site which would link up with the existing GSK campus perimeter road. The main pedestrian / cycle access would be from the existing A602 underpass in the northeastern corner, which would link into proposed 'Gateway Gardens' alongside buildings 1, 3 and 5 with designated cycle and pedestrian paths leading visitors and staff across the main access road into the 'Arrival Plaza' in front of building 2 and data centre 2.
- 8.3.16 The proposed multi storey car parks and substations would be sited around the periphery of the site, on the western, northern and eastern boundaries closest to the A1(M), A602 and mainline railway. Buildings 2 and 4 would be sited to the south of the site to provide a gateway to the existing GSK campus. The data centres would be located to the north to utilise a larger portion of land with fewer below-ground constraints. They would be consolidated in a single, secure enclosure to allow all specific vehicle movements, maintenance and access to take place behind a secure line.
- 8.3.17 The layout is based on two data centres of broadly identical layouts, mirrored. This would allow for areas of servicing and plant to be consolidated in the centre of the site, whilst the more visible elevations to north, south and east are able to have a more distinct visual identity. A substation located in the north-west corner would act as a key wayfinding marker into the campus, and an adjacent security 'airlock' would manage access into the data centre site. All data centre car parking would be located within the secure boundary in surface car parks.
- 8.3.18 The proposed overarching landscape and townscape strategy has evolved from the emerging masterplan, where the key themes include nature, science, place making and community with the overall approach to create interest and diversity. Buildings connected to nature, which are outward looking and set around plot clusters to create a unique and positive setting also form part of the approach. The proposed development of the Campus would incorporate a family of buildings with diversity of architectural expression, building characters, forms and materiality, whilst sharing some key common features.

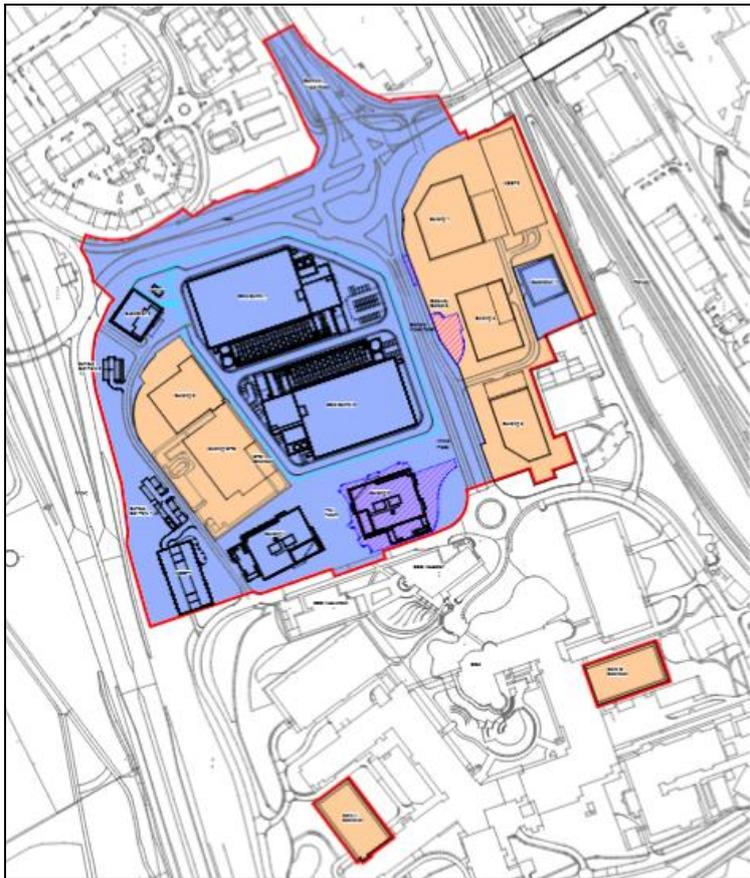


Figure 2 Detail and Outline Boundary Plan (purple zone is detailed)



Figure 3 Illustrative Masterplan

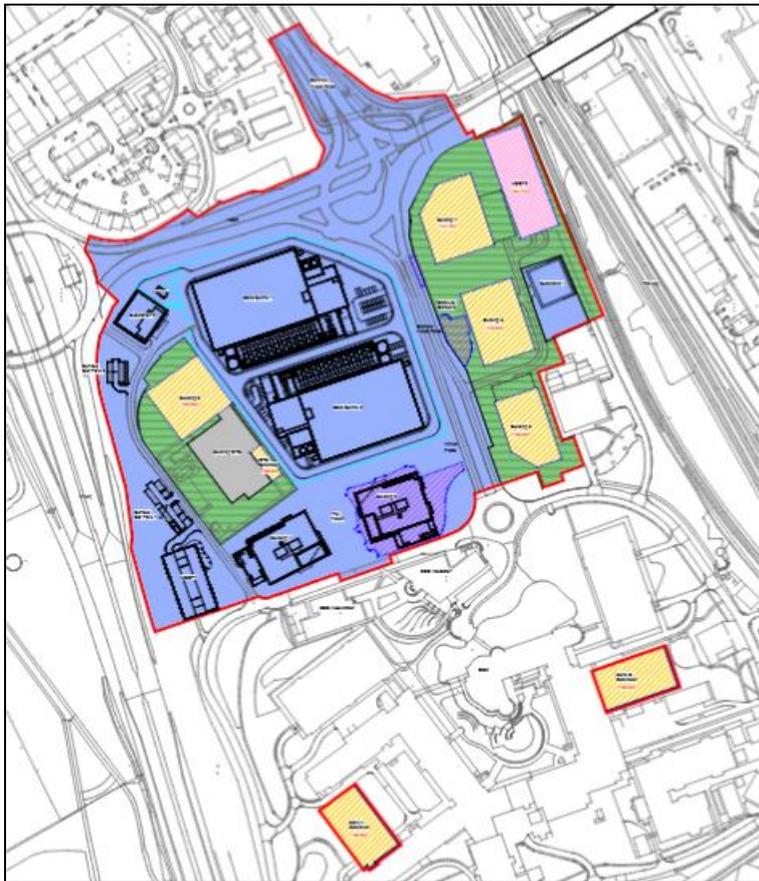


Figure 4 Parameter Plan

*Scale, Massing and Visual Impact*

- 8.3.17 Six key townscape principles have been identified, namely working with existing levels - higher in the north lower in the south, building height variation, landmark buildings at main site entrances, community focal point in most visible location and active-service-passive hierarchy. These principles are supported to ensure the site would be developed in the most successful way. The townscape principle of varied building heights and roofscapes is key for providing visual variation and interest.
- 8.3.18 Given Buildings 2 and 4 are subject to detailed planning approval, proposed elevations have been submitted which show they would be six storeys in height with rooftop plant above. The data centre buildings would be three storeys with rooftop flues. The MSCP 1 on the western boundary adjacent to the A1(M) would be ten storeys in height and has been designed to meet the needs of phase 1 of the development including Buildings 2 and 4 and the data centres. The car park is designed as a split-level structure for maximum efficiency.
- 8.3.19 The Parameter Plan (see Figure 4 above) showing the maximum development area and building heights shows buildings in the outline phase of the proposal would range in height from 125.9m AOD (Above Ordnance Datum) in the northwestern corner (building 6) to 144.4m AOD in the northern entrance to the site (building 1) including plant and lift overruns. The applicant has carried out a townscape and visual impact assessment looking at the proposed building heights from key views within and outside of the site to inform the proposed massing and scale, namely from the railway, pedestrian/cyclist approach, car/bus approach and from within the Campus.
- 8.3.20 Views from the east (the mainline railway) would include buildings 1, 3, 5 and MSCP2. The facade design of MSCP2 east elevation would respond to its high visibility from the railway, with opportunities for supergraphics and integration of artwork. This building character is

specified as part of the Design Code. The main pedestrian and cyclist approach to the site would be from the north, along an existing pedestrian and cycle path using the existing underpass under the A602. Key buildings in views from this approach would include building 1 and data centre 1, which would act as gateway landmarks into the new Elevate Quarter, with taller massing or identifiable features to mark the main entrance corners of the site. New landscape 'gateway gardens' with designated cycle and pedestrian paths would lead visitors and staff into the site.

- 8.3.21 There would be two key vehicle routes for cars and buses into the site from Gunnels Wood Road gyratory junction, approached from the north of the junction or the east through A602 and A1(M) junction 7. The townscape view from the main approach from Gunnels Wood Road gyratory would be dominated by building 1 and data centre 1 with a chamfered corner marking the entrance into the Campus. The view from the A602 would also provide opportunities for supergraphics on the east elevation of MSCP2, which would be visible by car as well as the railway. The view from the main approach from the A1(M) would be the existing trees to the east of the A1(M), which provide screening along the boundary of the site. The substation adjacent to data centre 1 would act as a landmark building to the A1(M) vehicle entrance to the Campus.
- 8.3.22 Considering views from within the site, the Forum would sit at the heart of the masterplan. It would be a meeting point and shared amenity for the campus, providing external amenity that would enable collaboration and innovation. The townscape view studies show the key approaches towards the Forum including the main pedestrian routes from the arrival plaza, existing GSK campus and from MSCP1. The views show that the Forum would be framed as a focal point between buildings 2 and 4. The buildings relationship with the surrounding landscape would be key, to provide activated frontages.
- 8.3.23 It is considered the submitted townscape analysis is thorough and the justification for the proposed scale and massing for all buildings in the detailed element of the proposal and within the parameter plan for the outline phase is sound. The application site sits on an island adjoined only by the existing GSK campus to the south. Bounded by the railway to the east, the A1(M) to the west and the Gunnels Wood employment area to the north, there is an opportunity for taller buildings in this location which, if well designed, could represent landmark features in this gateway part of the town.
- 8.3.24 Further to the above, it has been identified that the proposed townscape strategy of varied building heights and roofscapes is key for providing visual variation and interest. The approach of having taller buildings sited around the pedestrian and vehicular gateways to the site is justified and supported. Overall, it can be concluded that the proposed form and height of buildings 2 and 4, together with MSCP1, substations and the data centre buildings would be acceptable considering their location within the Campus. The suggested maximum height parameters of the remaining buildings would fit with the overall masterplan vision and would not have an adverse visual impact on the surrounding area and identified key views into the site.

#### *Design and Appearance*

- 8.3.25 The design and appearance of the buildings within the outline element of the proposal are reserved for future consideration, however an updated Masterplan Design Code has been submitted as a document to be re-approved as part of any outline planning permission which would provide a design framework to ensure future buildings would adhere to the high-quality architectural approach that has been adopted for buildings 2 and 4, MSCP1, substations and the data centres. Should planning permission be granted, this document would be subject to an updated planning condition 20 to ensure all future buildings comply with the approved Design Code.

- 8.3.26 Turning firstly to the specifics of the Masterplan Design Code, the proposed development of the Campus would incorporate a family of buildings with diversity of architectural expression, building characters, forms and materiality, whilst sharing some key common features. There would be six families or groups of building type, namely Landmark, Bookend, Woodland, Boundary, Link, Amenity Hub, Civic Placemaker and in addition, GSK extension buildings on the existing GSK campus.
- 8.3.27 Landmark buildings would comprise buildings 1 and substation 2, which would be the tallest buildings on the campus and/or located on key corners of the site. The Design and Access Statement advises the Landmark buildings would present a bold and memorable welcome to the visitors of the Campus and would be visibly prominent from a distance as well as close up when travelling by car, bicycle or as a pedestrian.
- 8.3.28 The Link Buildings (3, 6 and CTC Extension) would provide visual connections between buildings as visitors and staff move across the Campus. The Link buildings would have dynamic front facades with a horizontal emphasis in expression. The passive/back facades would also have a horizontal emphasis that is both curated and hardworking.
- 8.3.29 The Woodland Buildings (5 and MSCP1) would be located at key corner interfaces between GSK and the new Campus, bordered by existing and new trees on their south facades. They would comprise chamfered forms to allow for retention of existing greenery, open up views of neighbouring buildings and address the Campus Park by providing opportunities for entrances.
- 8.3.30 The Civic Buildings (2 and 4) is the key are the key buildings addressing the central Forum, through a strong civic presence and clear identity. They would act as an anchor point in the Campus. The elevations of Data Centre 2 facing onto the Forum and Arrival Plaza have also been designed to respond to the civic scale and character of this part of the campus.
- 8.3.31 The Boundary Buildings (MSCP2 and Substation 1) are peripheral buildings within the Campus that primarily front onto the roads and/or railway around the Campus. There is opportunity for supergraphics on prominent external facing elevations, whilst the quieter sides facing into the Campus can respond to the human scale and feel of the Campus through planting and screening.
- 8.3.32 The Root Buildings (data centres) are central to the Campus and form the background to key views from across the site. There is opportunity for a distinctive graphical treatment on prominent external facing elevations, whilst the quieter sides facing into the Data Centre site can provide areas for servicing and flues.
- 8.3.33 The GSK Extension Buildings would be set within the existing GSK campus. As such they are less prominent than the buildings within the primary development site. The buildings' footprint and scale would be a continuation of the existing campus buildings. Their form and materiality would be developed in an architectural language that is sympathetic to the existing campus, and cognisant of their impact on any longer views from outside the campus.

#### *Buildings 2 and 4*

- 8.3.34 The primary function of buildings 2 and 4 is for specialised laboratory use. In terms of the detailed architectural approach, the design has been considered through six key principles from masterplan to detailed scale. At masterplan scale, the buildings would respond to the landscape through the subtle rotation of massing, opening up routes to the centre of the site and making connections with the multistorey car park and adjacent GSK site. Main elevations have been given a civic quality to respond the arrival square, whilst a vertical hierarchy would give order to the overall mass. Emphasis has been placed on 'showing the science' using expressed risers, visually permeable ground floors and feature glazed

moments. At human scale, canopies would be used to clearly denote entrances, whilst the facades each have a unique character to provide identity within the wider masterplan.

- 8.3.35 The ground floor of both buildings would respond to the civic quality of the surrounding public realm. Increased areas of glazing would be used to provide visual permeability, entrances positioned in prominent locations to aid way finding and accessibility. Ground floors would be designed with generous reception spaces and surrounding lettable spaces would have connections to the wider landscape to facilitate a range of potential uses. Service areas would be discreetly located away from main public realm areas to separate heavy goods traffic from pedestrians and cycles.
- 8.3.36 In terms of detailed façade design of Building 2, the northern elevation would have a gridded elevation with fenestration to provide solar shading. The north elevation would also feature the main entrance, with a cantilevered canopy and adjacent cutaway, which provide a route through to the forum. The ground floor would be glazed to provide openness and transparency onto Meadow Walk with views in to 'show the science'. Looking onto the central Forum, the east elevation is treated as a civic frontage. The large central riser would act as a key wayfinding marker and would feature pattern and perforation to tie in with the data centre facades. Massing would step down to the south to provide an amenity roof terrace, and feature windows to the south-west would provide key moments onto the forum and Stevenage Bioscience Catalyst. An open ground floor would provide views in and out to the Forum.
- 8.3.37 The south elevation would feature balconies that provide activation towards the opposite Stevenage Bioscience Catalyst public realm. The central feature riser would break up the massing across the long elevation. Overlooking the Arrival Plaza, the north-west of Building 2 would include feature windows to provide activation and to 'show the science'. Sculptural risers would provide a distinctive identity to the elevation, with a material palette to align with the adjacent data centres. The lower portion of the elevation would feature a large extent of trees and natural landscaping to the foreground.
- 8.3.38 In terms of detailed façade design of Building 4, the southern elevation has been designed to address the existing GSK site through a strong civic presence and clear identity. A strong gridded structure defines the elevation, with a clearly located canopied entrance, further signified through the adjacent glazed cutaway chamfer. The grid extends beyond the parapet to contain a feature element of plant screen, giving a civic scale and proportion to the building. This cuts down towards the east to provide a roof terrace and step down towards the Forum. Amenity terraces are provided to the eastern elevation, both to provide solar shading and to offer the benefits of amenity to each floorplate. A feature riser tower is located on this elevation, and extends beyond parapet level, acting as a distinctive wayfinding marker with potential to incorporate distinctive artwork or light features.
- 8.3.39 The northern elevation would act as a backdrop to Meadow Walk and is designed to maximise views out through regular openings. Ground level glazing would activate the public realm to Meadow Walk, offering opportunities to 'show the science' and activities to spill out into the public realm. Distinctive riser towers are used to express the scientific function of the building on the western elevation, which is treated as a hardworking service elevation. Larger picture windows would give an outlook to the wider landscape. At ground floor, the service yard would be screened by secure fencing in a style to match the building.

#### *Data Centres*

- 8.3.40 The Data Centres would comprise flexible main data halls with associated administration and internal plant areas, along with ancillary external plant and backup generators. As critical infrastructure, the buildings would be contained within a secure enclosure with associated security huts and fencing. In addition, a dedicated substation (Substation 2) would provide power.

- 8.3.41 The design of the buildings has been considered from massing through to material use. At masterplan scale, the buildings would respond to the site through an offset in massing, opening up views across the site and staggering the building elevations to create a sense of movement. Main elevations are treated with a feature screen to respond to the key public areas, whilst inwards facing elevations deal with more intensive plant and servicing requirements. As a contained secure site, emphasis has been placed on achieving a green, discreet boundary onto key public facing elevations. The overall use of colour and pattern ties the buildings into the overall design code colour and material schemes and provides a distinctive identity to both the buildings and Campus.
- 8.3.42 As a secure site, consideration has been given to providing a positive aspect to the boundary condition for the data centres. Facing onto more public areas such as the Forum and Arrival Plaza, the boundary treatment would use a level change and planting with wire crate gabion walls to be filled with locally sourced stone to provide a more naturally screened boundary to the data centre site, whilst meeting security requirements. Boundary treatment serving more private areas away from public spaces would comprise 3.5m high weld mesh panel fencing.

#### *MSCP 1*

- 8.3.43 Multistorey car park 1 is designed to meet the needs of Buildings 2 and 4 in the detailed phase. The car park is designed as a 10-storey split level structure for maximum efficiency and features a PV canopy at roof level to provide additional power generation on site. With regards to the detailed façade design, the architects have taken inspiration from an oak tree as an overarching reference point for the project with a facade inspired by the fractal patterns of an oak leaf.

#### *Substations*

- 8.3.44 There are no changes to the approved substation 1 as part of this S73 application, with a Green PPC finish. Substation 2 serving the data centres would comprise a sinusoidal (wave form) aluminium, silver finish with illuminated wayfinding signage on an elevated structure above.

#### *Materiality*

- 8.3.45 Materials have been selected to give strong, yet unique identities to each building. The family of building types referred to above would incorporate a colour palette of brown, orange, yellow and green that would display variety and take inspiration of the changing colours of the oak tree and the existing natural colours of the site. As a phased masterplan, new buildings would incorporate colours on their facade that are complimentary of adjacent buildings and provide variety across the Campus. The facade materials would be high quality and durable. A range of primary material palettes would include anodised/PPC metal, pigmented concrete, glass, metal, timber and terracotta. Other materials may be used with care and consideration.
- 8.3.46 Both buildings 2 and 4 would use colour to provide identity and character (building 2 – green aluminium and building 4 – metallic profile finish), drawing on the overall colour scheme outlined in the Design Code. The buildings would share a common language through external risers and plant screens.
- 8.3.47 Data centre facades have been carefully considered to respond to the surrounding site, as well as the functional requirements of the buildings. Three facade types have been identified and applied in response to the surrounding site conditions. The type 1 elevation would be used as a feature backdrop to key public spaces including the Arrival Plaza and Forum, complimenting the material and colour palettes of the wider campus buildings. The

type 2 facade would provide a clear visual identity to the administration areas, and the simple type 3 facade would provide areas for servicing and would be inward facing.

- 8.3.48 Developed from the key design principles, the type 1 feature areas of elevation would be based on the concept of a dappled canopy of leaves drawing connections back to the Stevenage Oak, which runs through the wider masterplan. A faceted silver facade would play with scale and uses, folding to add depth and catch light. Coloured panels would be used to give an abstract large-scale pattern across the whole elevation, providing a sense of movement and change across the facade.

### *Conclusion*

- 8.3.49 It is considered that the detailed design of buildings 2 and 4, MSCP1, data centres 1 and 2 and the substations is of high quality and well justified. The buildings would respond successfully to their context and the character of the wider area. With regards to the outline element of the proposal, the proposed building types and materiality as set out within the updated Masterplan Design Code provides a strong framework to guide the future development of the site. The updated Design Code would be secured via an amended planning condition 20 should planning permission be granted to ensure the architectural vision within this application is central to future reserved matters applications.
- 8.3.50 The overall design approach detailed above is supported and it is considered the proposal would be in accordance with paragraph 135 of the NPPF in respect of design, Policies SP8 and GD1 – High Quality Design of the Local Plan (2019) and Stevenage Design Guide (2025).

## **8.4 Historic Environment and Archaeology**

- 8.4.1 The Planning (Listed Buildings and Conservation Areas) Act 1990 contains ‘statutory duties’ that apply to this application:

S.66: The decision maker shall have special regard to the desirability of preserving the setting of listed assets (relates to Knebworth Park and Garden and associated listed buildings, Broadwater Farmhouse, Roebuck Hotel, The Smithy, Golf Club House and Deard’s End Bridge).

- 8.4.2 Case Law has determined that in this context ‘preserve’ is taken to mean ‘to do no harm’. The NPPF requires ‘great weight’ to be given to conserving the significance of designated heritage assets (212). This is regardless of whether any harm may be ‘substantial harm’ or ‘less than substantial harm’ (212). Any harm should require ‘clear and convincing’ justification (213). If a development proposal would lead to less than substantial harm, this harm should be weighed against the public benefits of the proposal (214).
- 8.4.3 In undertaking that balancing, Case Law has confirmed that the presumption to preserve in the 1990 Act is a strong one and must be given ‘considerable importance and weight’. For instance, less than substantial harm is not a less than substantial planning issue. However, that presumption is not irrefutable and can be outweighed by circumstances important enough to justify it. A decision maker that has followed the processes set out in the NPPF can be considered to have discharged their duties under the 1990 Act. The balancing, however, is not ‘equal’ the presumption to preserve must come first.
- 8.4.4 Policy SP13 of the Local Plan relates to the historic environment and states that the Council will preserve and enhance the most important areas and characteristics of Stevenage. The Local Plan is consistent with the overarching policies contained within Section 16 of the NPPF. The NPPF is clear that the level of detail should be proportionate to the assets’ importance and no more than is required to understand the impact the development would have on the significance of the asset (207).

- 8.4.5 The original application was supported by a Historic Environment Desk-Based Assessment, which assessed the setting and significance of the designated heritage assets in the area surrounding the application site, which could be affected by the proposed development. It found that the application site did not form part of the setting of any of the heritage assets assessed, as it does not provide any meaningful experience of the assets in question, nor form part of any key views of the assets or have any meaningful contextual relationship with them. However, the site visit confirmed that modern buildings in the vicinity of the site were visible from the setting of the following heritage assets:
- Knebworth Park and Garden, and associated listed buildings.
  - Broadwater Farmhouse (NHLE 1101201)
  - Roebuck Hotel (NHLE 1308083)
  - The Smithy (NHLE 1101200)
  - Golf Club House (NHLE 1174298)
  - Deard's End Bridge (NHLE 1003546)
- 8.4.6 The report does acknowledge however that, due to their scale, there is potential for some of the buildings to be visible in the distance from the above listed heritage assets. Any visibility however would be within the existing context of other similar scale and format buildings which form an established backdrop to the assets. It follows that any change would be small and would not materially affect the character of the setting. On that basis, the report concludes that the proposed development would result in a negligible effect on the significance of the heritage assets. It is considered the amendments to the scheme and the introduction of data centres to the site would not alter this conclusion.
- 8.4.7 The report also considers the archaeological potential and assessment of significance of the site and determines that it has a 'low potential' for the presence of prehistoric remains and below ground remains associated with the Roman period. The site has a general potential for the presence of archaeological remains associated with the Medieval period and for below ground remains associated with the Post-Medieval and Modern period. It is identified that some remains of interest may have survived in the three smaller southern parcels and therefore a condition is recommended for a programme of archaeological works. The evidence provided as part of the assessment demonstrates that the proposed development continues to accord with Policy SP13 of the Local Plan and Section 16 of the NPPF.

## **8.5 Public Realm and Landscaping**

- 8.5.1 The application site measures 17.37ha and provides an opportunity to create meaningful areas of public realm through hard and soft landscaping. The Campus would be 'open' meaning that the public realm, including The Forum, Meadow Walk, and Motion Park with associated recreational equipment and facilities would be accessible to the general public. It follows that the proposed development would deliver substantial new recreational public space within Stevenage. However, it should be noted that due to security reasons the land around the data centres would be private and secured with fencing.
- 8.5.2 The revised Landscape Masterplan submitted in support of the s73 application sets out the general principles that guide the public realm and landscaping across the site. The revised Landscape Design Code sets out the principles that will guide future Reserved Matters submissions in the Outline Area, consistent with the original Code but updated to reflect the changes to the scheme. Condition 21 is to be amended accordingly to refer to the revised Landscape Design Code. The vision for the public realm is set out at Section 4 of the Masterplan Report which states that landscaping should be: Adaptive, Activated, Healthy and Innovative. The Illustrative Masterplan (see Figure 3 above) shows how the site could be developed in accordance with those principles.

8.5.3 The proposed development would include the following separate and defined Character Areas:

- The Forum
- Meadow Walk
- Green Links
- Motion Park
- Eco Buffer
- Data Centres

8.5.4 Each Character Area would perform a specific function and would comprise hard landscaping, planting and associated facilities (such as fitness equipment or seating) relevant to its intended use. Section 5 of the Landscape Masterplan report sets out the Character and Use for each area. In summary:

Character Area	Character	Use and Function
The Forum	<ul style="list-style-type: none"> <li>&gt; Amenity hub of the campus, busy, activated, unique</li> <li>&gt; Strong links between internal and external spaces</li> </ul>	<ul style="list-style-type: none"> <li>&gt; Space for working, socialising, gathering, performing, presenting</li> <li>&gt; Outdoor dining / working</li> <li>&gt; Space for pop up / temporary activations / public art / installations / cinema</li> <li>&gt; Ecological / wetland area</li> </ul>
Meadow Walk	<ul style="list-style-type: none"> <li>&gt; Open flexible civic space with green edge / frame</li> <li>&gt; Welcoming, high quality soft and hard materiality</li> <li>&gt; Activated and busy</li> </ul>	<ul style="list-style-type: none"> <li>&gt; Navigate and orientate</li> <li>&gt; Spill-out ground floor uses</li> <li>&gt; Meanwhile / pop up activations / Public art</li> <li>&gt; Integrated pop-up power, data, drainage and water for events</li> </ul>
Green Links	<ul style="list-style-type: none"> <li>&gt; Open and urban with green edge / frame</li> <li>&gt; Welcoming high quality</li> <li>&gt; Activated and busy</li> </ul>	<ul style="list-style-type: none"> <li>&gt; Welcome, navigate and orientate</li> <li>&gt; Active travel (cycle link)</li> <li>&gt; Spill-out ground floor uses</li> <li>&gt; Green infrastructure</li> <li>&gt; Space for recreation, gathering, working outdoors</li> <li>&gt; Quiet, wild garden with ecological function and educational aspect</li> <li>&gt; Quiet areas for sitting / collaborating / reading</li> </ul>
Motion Park	<ul style="list-style-type: none"> <li>&gt; Open flexible civic space with green edge / frame</li> <li>&gt; Welcoming, high quality soft and hard materiality</li> <li>&gt; Multi-use and adaptive with integrated blue infrastructure</li> </ul>	<ul style="list-style-type: none"> <li>&gt; Sports and recreation</li> <li>&gt; Meanwhile / pop up activations / public art</li> <li>&gt; Integrated stormwater drainage</li> </ul>
Eco Buffer	<ul style="list-style-type: none"> <li>&gt; Natural, retained, ecological and highly</li> </ul>	<ul style="list-style-type: none"> <li>&gt; Highly vegetated and ecological</li> </ul>

	biodiverse > Mature trees to be retained with strategy for supplementary tree planting	> Walking loops with micro destinations along the journey > Habitat features, interpretation and monitoring > Attenuation areas
Data Centres	> Soft edges to the data centre > Fencing and boarder features > Connection to the campus through colour and pattern	> Data storage

- 8.5.5 The public realm would include a range of facilities (such as outdoor meeting spaces, outdoor dining, seating, sports court, table tennis, walking trail and performance space with an option for outdoor cinema) and would be connected by pedestrian loops. The landscaping and public realm is designed to be functional and multi-purpose. The site has a complex topography and the approach to landscaping seeks to work with existing levels where possible and minimise the amount of spoil required to be removed. Gentle slopes and mounds are proposed to deliver compliant access and create naturally defined spaces. The public realm also includes integrated blue infrastructure to deliver a sustainable drainage strategy with biodiversity value and a positive aesthetic character.
- 8.5.6 The principal strategies that underpin the public realm and landscaping within the Campus are topography (the site slopes from west to east), blue infrastructure (water features), types of surface treatments (hard landscaping), furniture, fitness and recreation, health and wellbeing, boundary treatments and navigation and wayfinding. These strategies are explained in further detail in Section 6 of the updated Landscape Masterplan report.
- 8.5.7 The detailed element of the application includes a large proportion of the proposed public realm and landscaping (including The Forum, Meadow Walk, Eco Buffer and Data Centres). The applicant considers the public realm to be integral to the identity of the Campus and wants to establish the primary landscape setting for the buildings from the initial point of occupation of any floorspace.
- 8.5.8 Given the complexity of the development, particularly around site levels and phasing of the buildings in the detailed application the landscape strategy also responds to the construction phasing of the masterplan. The proposed condition for The Forum sees all proposed landscaping treatment around Buildings 2 and 4 footprints to be delivered as part of phase 1. This would also include the Arrival Plaza on Gunnels Wood Road. During the interim, the area within which Building 2 would be constructed would have a temporary retaining wall along the edge of The Forum and a loose gravel surface to the north of the existing car park which can be utilised for seating opportunities. The existing car park in the building 2 footprint would be retained while MSCP1 is constructed. The remaining meanwhile landscape would be planted with wildflower or left as existing vegetation. Once the construction of building 2 commences, the meanwhile landscape space would be removed and the proposed landscape design implemented.
- 8.5.9 The proposed public realm and landscaping at the site accords with paragraph 135 of the NPPF which seeks to ensure that developments are visually attractive and include appropriate and effective landscaping. The proposed development also accords with the guidance relating to 'Public Spaces' and 'Nature' Sections of the Design Guide SPD (2025) and Policies GD1 and SP12 of the Local Plan. It is considered the overall approach and principles that have led to the development of the proposed landscape strategy are fully justified and the resulting strategy is exemplary in terms of delivering on the overarching vision. The high-quality landscape strategy would significantly enhance the user experience

of the site and make the Campus a destination people would want to spend time in, whether for work or leisure.

## **8.6 Highway Impact, Access and Parking**

8.6.1 The original planning application was accompanied by a Transport Assessment and a Framework Travel Plan (April 2023) which followed extensive pre-application discussions with Hertfordshire County Council, Stevenage Borough Council, and National Highways. A robust sustainable travel package was prepared to maximise the use of sustainable modes of transport with a range of infrastructure and motivational initiatives. The Transport Assessment also included detailed analysis of the impact of the development on the local road network, and specifically the new gyratory junction on the A602, Junction 7 of the A1(M), and the roundabout junction of Broadhall Way with Monkswood Way to the east of the gyratory.

8.6.2 This s73 application is supported by a Transport Assessment Addendum, which has been prepared in relation to the amended plans. The robust sustainable travel package would remain focal to the revised scheme. The revised scheme would result in no alterations to the layout of the planned new gyratory junction on the A602 or the improvements to the direct vehicle access from the A1(M) junction approved as part of the original hybrid application in May 2024.

### *Vehicle Access*

8.6.3 Vehicle access and egress to the site is currently provided from the south side of the junction of Gunnels Wood Road and the A602 Broadhall Way. In addition, vehicle access is provided via a direct access from Junction 7 of the A1(M). The Gunnels Wood junction is currently provided as a roundabout and is designed to permit all turning movements. Free flow left turn lanes are provided between all adjacent arms to remove left turning traffic from interaction with circulatory traffic. At present the roundabout junction operates on a 'priority' system without traffic signals. Pedestrian and cycle facilities are provided via underpasses. The direct access from Junction 7 of the A1(M) provides access only to the site. There is no vehicle egress at this location.

8.6.4 As part of the detailed element of the application, a new gyratory junction would be provided in place of the current Gunnels Wood roundabout junction. The design reflects what was approved under the original application. The new gyratory junction, which would be signal controlled, would continue to provide all turning movements with the exception of A602 west to Gunnels Wood south. Traffic entering the GSK Campus site from the west would instead make use of the existing direct access from Junction 7 of the A1(M). A plan of the gyratory can be seen in Figure 5 below.

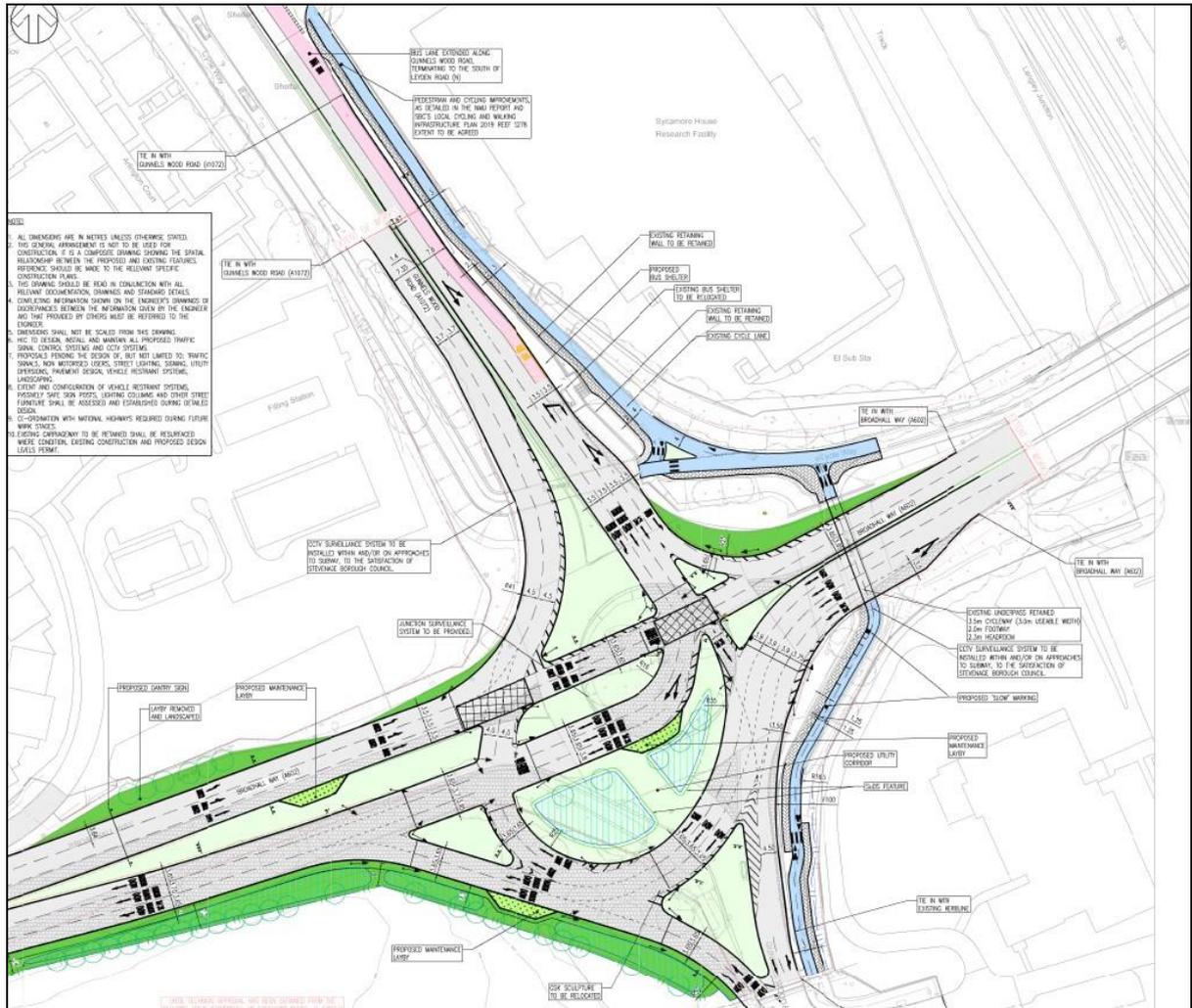


Figure 5 New Gyratory

- 8.6.5 The vehicle access to the site from the new Gunnels Wood gyratory would be provided as a two-lane entry. In order that traffic entering the site does not block back to the gyratory, no right turn movements would be permitted or possible on this road until traffic reaches the existing internal site roundabout that is located around 300m to the south of the entry from the gyratory. This would ensure that no traffic is waiting to turn right thus creating a blockage on one of the access lanes. In addition, the only left turn side road on this section of road would be around 180m south of the entry from the gyratory.
- 8.6.6 Vehicle egress from the site to the new Gunnels Wood gyratory would be provided as a two lane exit from the existing internal site roundabout, narrowing to one lane to allow for the provision of the proposed bus lane egress. Beyond the proposed bus egress gate, the two-lane provision would resume and lead to the stop line at the gyratory access. Modelling of this feature shows that forecast queues leaving the site in the PM peak hour could be accommodated within this design.
- 8.6.7 In terms of A1(M) Junction 7 access, a two-lane entrance to the Campus site fed by Link J711 would be provided. This would be supported by changes to road markings such that Lane 1 would be for GSK Campus site flows only, and Lane 2 would be for GSK Campus site and 'straight ahead' flows. The changes to road markings at Junction 7 of the A1(M) have been subjected to a Stage 1 Road Safety Audit. An audit brief setting out the terms of the Road Safety Audit was supplied to, and approved by, National Highways. Upon entry to the site from Junction 7 of the A1(M), a signalised junction would be provided within the

internal site perimeter road located 65m from the Junction 7 access. The lights would be timed to ensure traffic accessing the site would not block back to the A1(M) junction.

- 8.6.8 Within the proposed development, all internal roads would be provided with 7.5m wide two-way routes and 6m kerb radii. The detailed element of the application is made on this basis with the area within the outline application to be subject to future reserved matters applications. At present GSK security access (barriers) are provided on the Gunnels Wood Road access, approximately 140m from the current Gunnels Wood roundabout. As part of the proposed development, the GSK security lodge would be relocated to the south of the site within GSK retained land as per planning permission 23/00249/FP. This permission is valid until May 2026. As such, access to the site from the new Gunnels Wood gyratory would be unimpeded by security delays.
- 8.6.9 The junction of the internal site perimeter road with Gunnels Wood Road would be provided as a one-way eastbound route with only left turn movements permitted. By making this route one way eastbound, it would prevent traffic entering the site from the new Gunnels Wood Road gyratory turning right and potentially impeding other arriving traffic, hence removing the potential for traffic to tail back to the new gyratory. By preventing the right turn from the perimeter road to Gunnels Wood Road, this would reduce the potential for in or outbound traffic to / from the site to be impeded.
- 8.6.10 Sense checking of the proposed masterplan layout has been carried out to ensure that traffic entering the site from either the new Gunnels Wood gyratory or the A1(M) Junction 7 access, could access all areas / buildings of the proposed site.

#### *Cycle and Pedestrian Access*

- 8.6.11 The existing external cycle and pedestrian route network is good in terms of coverage, with a direct traffic free link from the town centre to the application site and links to the east and south. With regards to internal site cycle links these would connect to the cycle route access to the site which would be on the south-eastern corner of the current / proposed A602 / Gunnels Wood junction. Cycle and pedestrian access to the site would be via the existing underpass, which is located under the eastern arm of the A602 approach to the current roundabout / proposed gyratory junction. Improvements would continue to be sought for this underpass via planning condition 18 in terms of lighting, artwork and signage.
- 8.6.12 On emerging from the underpass, attractive landscaping / planting would provide separate cycle and pedestrian routes heading south on the east side of Gunnels Wood Road. Along this section of route, access to three of the proposed buildings would be provided. A 10m wide raised surface crossing would provide access to the main Arrival Plaza on the west side of Gunnels Wood Road. The crossing would feature a central reserve / refuge area so that only two lanes of traffic would have to be crossed at once. A 20mph speed limit would apply across the Campus.
- 8.6.13 Where cycle / pedestrian routes cross internal roads, raised carriageway surfaces with tactile paving / rumble strips would be provided to warn pedestrians / cyclists of the crossing. Crossing design would be carried out in line with the appropriate highways design guidance, namely LTN 1/20. At all opportunities, priority would be given to pedestrian and cycle traffic where appropriate. Master planning for the site would provide traffic free routes from the site's cycle and pedestrian access to all buildings / facilities.
- 8.6.14 Cycle routes would be provided in line with LTN1/20 guidelines. This would be key to encouraging people to cycle. Cycle / pedestrian access would be delivered as part of Phase 1 (under the detailed application) of the scheme. As further phases of the development are built out, the same design guidance would be followed. Internal cycle and pedestrian links from the site's access to each phase of the development would be

provided prior to occupation of each phase/building. Outside the site, footways on local roads connect to the network of shared pedestrian / cycleways that link to the underpass beneath the A602 on the eastern side of the Gunnels Wood Road junction. These are generally in good state of repair, are well lit and have natural surveillance when running alongside roads.

#### *Bus Access*

- 8.6.15 In terms of public bus links, the site and surrounding area is served by 13 local bus routes. Those that serve the nearest stops on Gunnels Wood Road (north of the current roundabout junction) only operate during morning and afternoon peak periods and serve local town centre destinations, while routes that can be accessed to the east of the site at the 9 Yards (Roaring Meg) and London Road retail parks operate throughout the day and tend to serve destinations further afield. Additional bus services are available on London Road to the east of the site, which can be accessed via the Monkswood Way roundabout underpasses and Monkswood Way south of the roundabout.
- 8.6.16 As part of the proposed development, an on-site bus stop serving a shuttle bus for employees linking the site with the railway station would be provided adjacent to the Arrival Plaza. This would feature a shelter, seating, lighting, real-time bus information and wayfinding information. The applicant has committed to working with the appropriate team at HCC's Passenger Transport Unit to explore the potential delivery of public bus services to serve the on-site bus stop for future phases. The provision of an on-site shuttle bus stop would form part of Phase 1 of the proposed development.
- 8.6.17 It is proposed that a bus lane / bus priority scheme would be provided on the site's egress route with provision made as part of the internal site road layout. This facility would ensure that buses serving the site are given priority over cars leaving the site. The decision to provide this facility would give potential commercial bus operators comfort that services would not be unduly impacted by queuing.

#### *Sustainable Travel Package*

- 8.6.18 The existing planning permission for the Life Sciences Campus is supported by a Framework Travel Plan, which seeks to reduce the use of private cars and promote sustainable transport for trips to and from the site. The application site has been shown to have good existing sustainable travel links in terms of pedestrian, cycle and bus access. This is reflected in data on travel characteristics for existing GSK staff and the fact that only 56% of staff travel to / from the site by car. A robust package of sustainable travel initiatives would be implemented as part of the development, both infrastructurally and procedurally, coupled with 'buy in' from site wide and tenant organisation management. The proposed initiatives are as follows:

<b>Sustainable Travel Initiative</b>	<b>Details</b>
Arrival Plaza / Mobility Hub	The scheme will feature a primary mobility hub area within the site on Gunnels Wood Road. This will be the focus for sustainable transport on the site and feature various elements of the sustainable access strategy including pedestrian / cycle access, bus stops for the shuttle bus and public buses and cycle infrastructure. The provision of the Arrival Plaza is secured as a pre-occupation condition (number 12) associated with the approved scheme and is intended to remain as part of the revised application.
Bike / E-bike Schemes	As part of the S106 Agreement, a financial

	<p>contribution towards the provision of a cycle hire scheme in Stevenage was agreed. The Council's Beryl Bikes scheme has been brought in to use as of June 2025. Discussions will be carried out with SBC and Beryl Bikes such that there are sufficient bikes to meet demand as each phase of the development is occupied, and that there are sufficient facilities on-site to accommodate the scheme. The applicant, in partnership with SBC and Beryl Bikes, would provide sufficient on-site cycle hire facilities to complement the existing Beryl Bike scheme between the site and the railway station from Day 1.</p>
On Site Bus Priority	<p>A bus lane / bus priority scheme will be provided on the site's egress route from Day 1 with provision made as part of the internal site road layout. This facility will ensure that buses serving the site (shuttle buses / public buses) are given priority over cars leaving the site. The provision of on-site bus priority measures is secured as a pre-occupation condition (number 15) associated with the approved scheme and is intended to remain as part of the revised application.</p>
Site Shuttle Bus	<p>In addition to public bus services, GSK Stevenage currently operates a peak hour shuttle bus service between GSK and Stevenage rail station. A Shuttle Bus Service Operation Plan is secured as a pre-occupation condition (number 14) associated with the approved scheme and is intended to remain as part of the revised application.</p>
Parking Strategy	<p>The proposed principal to be adopted, consistent with the approved scheme, is to provide car parking in line with Council standards at 1/35m<sup>2</sup> for the detailed phase of the development, with reduced parking ratios in subsequent phases subject to monitoring of sustainable transport usage and parking uptake. This would result in future overall parking standards at levels below the Council's standard, which would deter employees from driving to the site. The Data Centre buildings are assessed separately. Parking monitoring for future phases is secured as part of pre-occupation condition (number 17) associated with the approved scheme and is intended to remain as part of the revised application.</p>
EV Charging Facilities	<p>EV charging facilities would be provided within the site car parks from Day 1. It is proposed that EV charging facilities would be provided to satisfy the Building Regulations standard of 20% of spaces</p>

	having active EV charging facilities. The provision of EV charging is secured by condition (number 44) associated with the approved scheme and is intended to remain as part of the revised application.
Mode Share Targets	The implementation of the sustainable travel measures would aim to achieve mode share shifts, specifically reducing private car use and promoting sustainable transport. Full details of the implementation, operation, and management of these will be set out in the Travel Plan secured under condition 16 and monitoring programme secured under condition 17 associated with the approved scheme and is intended to remain as part of the revised application. With a range of sustainable travel initiatives, a reduction of up to 10% in single occupancy car trips could be achieved. This would make a significant difference to vehicle traffic traveling to and from the site and hence the operation of the proposed gyratory junction and other existing junctions in the area.

- 8.6.19 Thorough and regular monitoring would identify targets and assess to what extent they are being reached over the life of the scheme. The reporting of progress would be carried out in consultation with the Local Planning Authority. It is the aim of the scheme to reduce vehicle-based trips to and from the site. In addition, all opportunities would be taken to encourage staff and visitors to make more sustainable trips to and from the site. The Travel Plan would be implemented when the detailed phase of the development is brought into use and under the terms set out in the legal agreement. The positive comments of Active Travel England have been considered, and the proposed planning conditions relating to the sustainable travel package would address these.
- 8.6.20 On this basis, it is concluded the proposal would comply with Local Plan Policy IT5 'Parking and Access' in that it would (i) provide safe, direct and convenient routes within the development, (ii) link to existing cycleway and pedestrian networks and (iii) contribute towards improving cycleways and pedestrian routes serving the development site and Policies SP5 and SP6 in terms of the provision of new infrastructure and sustainable transport within the town.

#### *Highway Impact*

- 8.6.21 The submitted Transport Assessment addendum sets out the trip generation assessment for the proposed development. Trip generations for the proposed new Life Science / R&D buildings have been based on site specific trip rates and are consistent with the assessment methodology submitted with, and approved in-principle, as part of the approved Hybrid Application. A separate assessment is set out in relation to the planned Data Centre buildings since this is a new element in the revised scheme.
- 8.6.22 The proposed new Life Science / R&D buildings are forecast to generate a total of 3,315 vehicle trips per day, comprising 1,617 arrivals and 1,698 departures. A site wide Travel Plan and package of sustainable transport initiatives would be implemented to reduce car-based trips and promote sustainable travel. Mobility experts have suggested that the package of sustainable travel measures / Travel Plan would achieve a reduction of between 8% and 10% in car-based trips, with increases in sustainable modes. Even at the most

conservative mode share changes, the data suggests car driver trips could reduce by around 250 per day.

- 8.6.23 Data Centres typically have far lower employee to floor area ratios than other employment uses such as Life Sciences / R&D buildings. Accordingly, the ratio of generated vehicular and non-vehicular trips to floor area is significantly lower by comparison. The predicted staffing operations for the proposed Data Centre buildings have been based on precedent information submitted with a planning application for a similar Data Centre development at the former Didcot A Power Station approved in 2021.
- 8.6.24 The proposed data centre buildings are forecast to generate a total of 317 vehicle trips per day, comprising 159 arrivals and 158 departures. The predicted total daily vehicular trip rate per 100m<sup>2</sup> floorspace is around 64% less comparing data centre and Life Science / R&D use classes. In addition, there would also be an element of sustainable travel increase and car driver reduction arising from data centre staff travel behaviour once the site is operational.

#### *Approved Scheme vs Amended Scheme Vehicle Trip Comparison*

- 8.6.25 The revised scheme results in a net overall reduction of 31,553m<sup>2</sup> GIA floorspace associated with Life Sciences and an introduction of 31,467m<sup>2</sup> GIA of Data Centre floorspace compared to the approved scheme. Data suggests the revised scheme is expected to generate 491 fewer vehicle trips daily than the approved scheme, comprising 235 fewer vehicle arrivals and 256 fewer vehicle departures. This is a 12% overall decrease in forecast development vehicle trips daily. In the AM (0800-0900) and PM (1600-1700/1700-1800) peak periods, the revised scheme is expected to generate 94 and 78/79 fewer hourly vehicle trips respectively. This is a 16% decrease in forecast development vehicle trips in each peak hour.
- 8.6.26 The revised scheme is therefore predicted to result in fewer vehicle trips to / from the site in the AM and PM peak periods and across a full day, and accordingly the revised scheme would result in fewer additional vehicle trips on the local and wider road network compared to the approved scheme. The revised scheme would therefore result in less impact on the surrounding public highway, most notably the key junctions assessed as part of the approved scheme, namely the planned new Gunnels Wood Road gyratory, the A1(M) junction 7, and the Monkswood Way roundabout.

#### *Junction Capacity Assessment*

- 8.6.27 The Transport Assessment also assesses the impact of the proposed development both in terms of vehicular traffic and junction capacity. Extensive junction modelling work has been carried out to assess the impact of the proposed development on the proposed Gunnels Wood gyratory, Junction 7 of the A1(M) and the Monkswood Way roundabout. Peak hours for assessment have been determined from total vehicle flows through the junctions surveyed as 08:00-09:00 and 16:00-17:00.
- 8.6.28 The extensive junction modelling work summarised that, with regards Junction 7 of the A1(M) and the proposed Gunnels Wood gyratory, the additional vehicle trips generated by the approved development could be accommodated within design capacity of each junction. In addition, queues would not tail back on to the live running lanes of the A1(M) or on the A602 between junctions. Similarly, with regards the Monkswood Way roundabout, the junction assessments showed that the approved development could be accommodated within design capacity of the junction for all arms in both peak periods except for Broadhall Way (East arm) during the AM peak hour which is shown to operate within absolute capacity.

8.6.29 It is therefore evident that the lower levels of additional vehicle trips generated by the revised scheme would be adequately accommodated within design capacity of each junction. The revised scheme would result in less impact on the local road network and less impact on the performance / capacity of the Gunnels Wood gyratory, Junction 7 of the A1(M) and the Monkswood Way roundabout compared to the approved scheme. National Highways has reviewed the supporting documents and agree with the methodology and mode share presented within the Transport Assessment addendum and have raised no objection to the amended scheme.

#### *Sustainable Travel Impact*

8.6.30 In addition to having an impact on the local road network, the proposed development would also impact on the local sustainable travel network, although the revised scheme would have less impact than the approved scheme and it is noted that a sustainable travel package has been developed which would be implemented alongside a site wide Travel Plan.

#### *Parking*

8.6.31 With regards parking provision, the Parking Provision SPD (2025) sets out the requirements for car parking, accessible parking, EV charging parking, motorcycle and cycle parking. The SPD proposes a system whereby vehicle parking is provided on the basis of 5 accessibility zones, with lower levels of provision permitted in the most accessible locations and higher levels of provision in less accessible zones. For non-residential development, the main determinant of accessibility is the proximity to passenger transport and whether or not people can use non-vehicle modes of transport and whether parking levels can be reduced. The proposed development site is located in the 'All other areas' category where car parking provision is allowed at 75% to 100% of the published standards. Parking provision for the data centre buildings is provided separately from the provision associated with the wider Life Science / R&D development and would be provided within the plots for Data Centre 1 and Data Centre 2.

#### *Vehicle Parking – Life Science / R&D*

8.6.32 The starting point for assessment of vehicle parking is the published maximum car parking standard of 1 space per 35m<sup>2</sup> for research and development and industrial processes, which is consistent with the proposed Life Science / R&D land use and is consistent with the approach established and approved in-principle through the approved Hybrid Application. The proposals aim to provide to the lower end of the allowed parking standards which is 75% of the published standards.

8.6.33 The SPD goes on to set out that 5% of the total number of car parking spaces (i.e. not in addition to) should be provided for motorcycle use. Of the balance, 20% should have access to active EV charging facilities, 5% should be provided as accessible parking spaces, with a further 5% provided as enlarged standard spaces that can be adapted in the future for use by disabled drivers.

8.6.34 Based on the proposed development schedule, details of parking spaces by type and proposed building are shown below:

**Parking based on Parking Provision SPD standards (1/35m<sup>2</sup> @ 75%)**

Phase	Building/GIA	Parking Spaces by Type							Total Parking Based on SBC Standards
		Standard Passive EV	Standard Active EV	Disabled Passive EV	Disabled Active EV	Enlarged Passive EV	Enlarged Active EV	M <sup>2</sup> /cycle	
Detailed 1	B2 - 18,120 sqm	266	66	15	4	15	4	19	389
	B4 - 16,583 sqm	243	61	14	3	14	3	18	356
	Existing SBC Car Park	214							-
Outline 2	Up to 64,225 sqm*	941	235	52	12	52	12	69	1373
	Existing CTC Car Park	148							-
Total New Spaces	Detailed & Outline	1450	362	81	19	81	19	106	2118
Total New + Existing	Detailed & Outline + SBC/CTC	1699	427	95	23	95	23	105	2480

**Planned Parking Provision by Phase**

Phase	Building/GIA	Parking Spaces by Type							Total Planned Parking Provision
		Standard Passive EV	Standard Active EV	Disabled Passive EV	Disabled Active EV	Enlarged Passive EV	Enlarged Active EV	M <sup>2</sup> /cycle	
Detailed	B2 & B4 - 34,703	509	127	29	7	29	7	37	745
	Existing SBC Car Park	214							214
Outline	Various - 64,225 sqm	941	235	52	12	52	12	69	1373
	Full SBC and CTC re-provision	260	67	15	3	15	3	0	362
Total New + Existing	Detailed & Outline + SBC/CTC	1710	429	96	22	96	22	106	2480

- 8.6.35 Parking provision for the detailed phase (34,703m<sup>2</sup>) would be made in line with the above SPD parking standards of 1 space per 35m<sup>2</sup> at 75% by means of multi-storey car park (MSCP) 1 and two surface level car parks. Parking provision for the outline phase (64,225m<sup>2</sup> which excludes the GSK Zone A and Zone B extensions) would be made in line with the above SPD parking standards of 1 space per 35m<sup>2</sup> at 75% by means of MSCP2.
- 8.6.36 The detailed application comprises the provision of 745 new parking spaces plus the re-provision of 214 Stevenage Bioscience Catalyst (SBC) building car parking spaces. A total of 810 new parking spaces is planned to be provided within MSCP1 plus 40 parking spaces provided at-grade; therefore 850 'new' parking spaces are planned to be provided at the detailed phase. As such, there would be an over-provision of 105 new parking spaces in the detailed phase which would accommodate 105 existing re-provided SBC building parking spaces in MSCP1. The balance of 109 existing SBC building parking spaces would be temporarily re-provided utilising existing overflow and leisure centre parking spaces east of the site. This arrangement is indicatively shown in the diagram below:

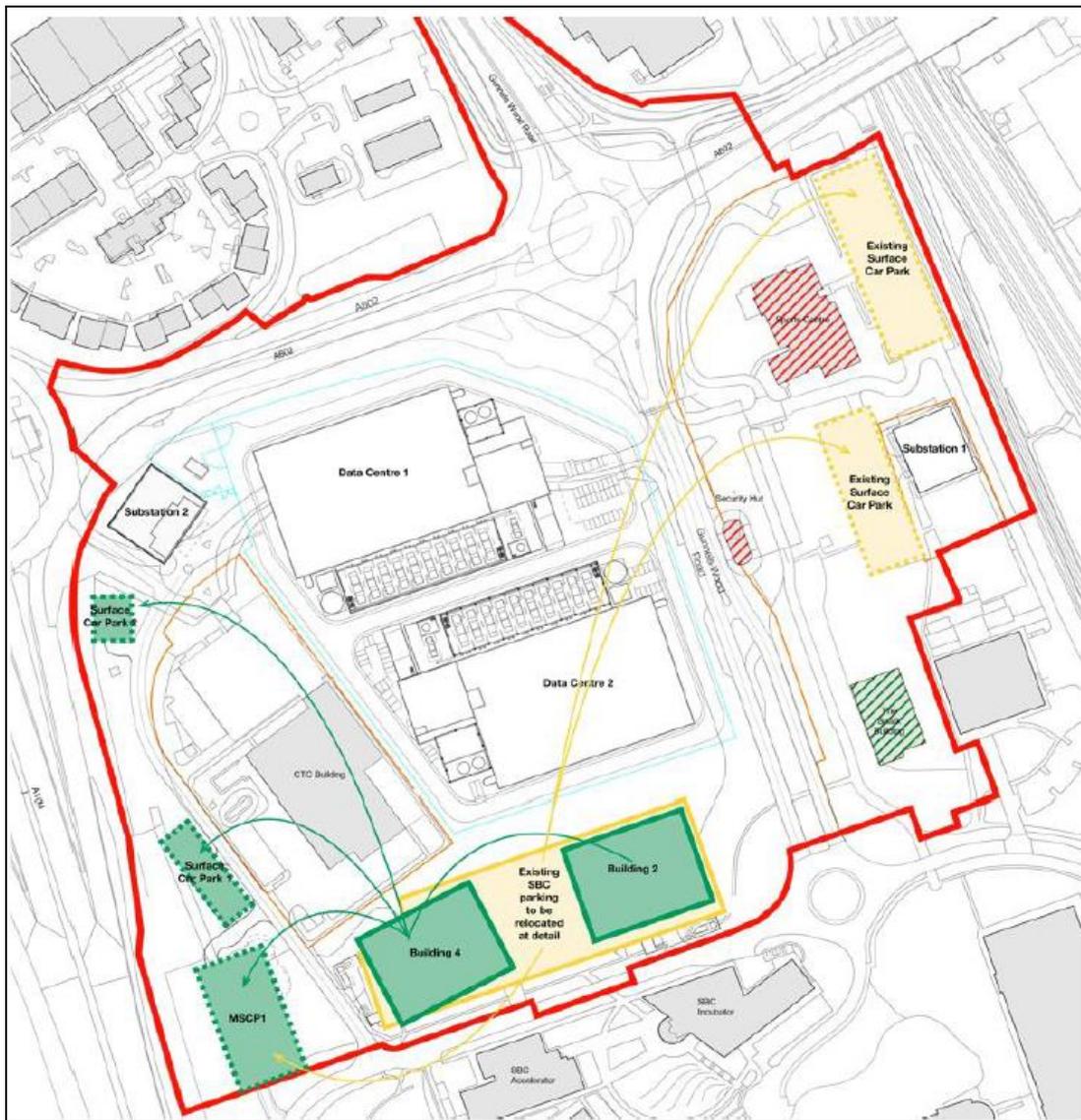


Figure 6 Temporary Parking Arrangement

- 8.6.37 For the outline phase 1,373 parking spaces would be required for the 64,225m<sup>2</sup> total floor space. All 362 existing SBC and CTC building parking spaces would also be permanently re-provided at the outline phase. The approach to parking provision for the planned new Life Science / R&D floorspace has been established as acceptable in-principle as part of the Hybrid Application consent. Consistent with the Hybrid Application, reduced parking ratios would be applied to subsequent phases, subject to monitoring of sustainable transport usage and parking uptake. This would result in future overall parking standards at levels below the Council's standard so as not to encourage driving to the site by providing more spaces than are required, and indeed at reduced levels that would actively discourage driving to the site.
- 8.6.38 The provision of parking for future phases would be controlled by Condition number 17 as part of any revised scheme planning permission. Accessible parking spaces would be provided at ground floor levels or close to lift access on upper floors. EV charging facilities would be provided in open surface level car park locations, EV parking spaces within the MSCP are to be located on the lower levels of the car park, subject to fire engineer confirmation.
- 8.6.39 The Hybrid Application was approved based on 3,145 parking spaces being provided inclusive of 362 re-provided SBC and CTC building parking spaces via three MSCPs plus surface level parking. The revised scheme is submitted based on 2,480 parking spaces

being provided inclusive of 362 re-provided SBC and CTC building parking spaces, via two MSCPs plus surface level parking. The revised scheme results in a total provision of 665 fewer parking spaces than the approved Hybrid Application scheme, inclusive of re-provided SBC and CTC building parking spaces. This is a 21% overall decrease in total parking provision for Life Science / R&D floorspace, reflecting the reduction in floorspace of that element and consequential vehicle trip reduction.

#### *Cycle Parking*

- 8.6.40 The Council's SPD for office / light industry and research land uses requires minimum levels of cycle parking provision 1 long term (staff) space per 500m<sup>2</sup> and 1 short term (visitor) space per 1,000m<sup>2</sup>. The proposed cycle parking for the detailed element is based on BREEAM/BCO 1:10 (cycle stand to staff ratio) standards and provides a significantly higher quantity of spaces over the Council's minimum expectations. For example, building 2 comprises 18,120m<sup>2</sup> floorspace and would therefore require a minimum of 36 cycle parking spaces based on Council standards. Likewise, building 4 comprises 16,583m<sup>2</sup> floorspace and would require a minimum of 33 cycle parking spaces.
- 8.6.41 Building 2 is planned to have an integrated cycle store at ground floor level providing 106 cycle parking spaces comprising 84 staggered spaces, 10 wall mounted racks, and 12 wishbone stands. Building 4 is planned to have an integrated cycle store at ground floor level providing 97 cycle parking spaces comprising 40 staggered spaces, 33 wall mounted racks, 12 cradle spaces, and 12 wishbone stands. The range of cycle parking stands would allow cyclists of all abilities to access cycle parking. All long stay cycle parking provision would be covered, secure and conveniently located for access to the buildings served.
- 8.6.42 Each building would have complementary cycle facilities such as shower and changing areas with accessible features, drying rooms, hair dryers / straighteners and storage lockers and electric bike charging facilities. Cycle parking areas would also feature equipment for basic maintenance, such as spanners, Allen keys, pumps and spare inner tubes. Short term cycle parking would be provided by means of Sheffield stands at 1m spacing, with spaces on the ends of runs providing additional space for accessible / non-standard cycles and cargo bikes. The Transport Assessment addendum advises the outline buildings would meet and aim to exceed the Council's minimum cycle parking standards.

#### *Vehicle Parking – Data Centre Buildings*

- 8.6.43 The Council's Parking Provision SPD (2025) does not specify parking standards specific to data centre land use class. Therefore, the applicant has applied a first-principles basis to the proposed parking provision for the data centre buildings. It is expected up to 30 full-time staff would be on site during a typical weekday per building with up to 7 full-time staff on site during the night, including security staff. Up to 13 external staff / maintenance staff / visitors per building are also included as part of standard operation of the data centres during the day.
- 8.6.44 It is reasonable to assume that the full-time data centre staff would travel to work in a similar manner to the existing GSK travel mode patterns. Accordingly, 56% of data centre staff might drive to work based on GSK travel mode patterns, however by removing and redistributing the 5% proportion who work from home a slightly higher figure of 59% is likely since data centre staff are unlikely to work remotely. Of the 30 full-time staff per building on site during a typical weekday, around 17/18 are therefore likely to drive to work. It is also reasonable to expect that the 13 external staff / maintenance staff / visitors are likely to drive, resulting in a total daytime parking demand of 30/31 parking spaces per data centre building.
- 8.6.45 The proposal makes an allowance for 30 car parking spaces per data centre building which would be provided at-grade adjacent to each building within the data centre plot. This is a

reasonable evidence-based parking provision for the data centre buildings and reflects the strong transport sustainability focus that has been applied to the site-wide Campus. The same ratio of car parking space provision would be applied to the data centre buildings as per the Life Science / R&D element of the proposal, comprising 20% Active EV and 80% Passive EV charging provision and 10% accessible parking provision.

#### *Cycle Parking – Data Centre Buildings*

- 8.6.46 The Council's Parking Provision SPD (2025) does not specify cycle parking standards specific to data centre land use class. The proposed cycle parking for the data centre buildings is therefore based on the same BREEAM/BCO 1:10 (cycle stand to staff ratio) standards applied to the detailed Life Science / R&D buildings as set out above. Taking a worst-case scenario of 50 staff per building, the cycle parking requirement based on BREEAM/BCO standards is five long-stay spaces per building. This level of provision would exceed the likely demand for cycle parking generated by data centre staff if the existing GSK staff travel mode share for bicycles is applied, which is 6% (i.e. three staff cycling to work based on 50 total staff). The proposal makes an allowance for five secure and sheltered long-stay cycle parking spaces per data centre building which would be provided within integrated stores in each building.

#### *Servicing and Refuse Arrangements*

- 8.6.47 All types of waste would be separated according to its requirements in a secured bin store area (refuse, recycling, gas and chemical refuse). The main refuse and recycling store has been designed to allow space for manoeuvring Eurobins and drainage with a water supply for cleaning purposes. The refuse and recycling storage has been designed in accordance with BREEAM Wst 03, General Waste and OCC requirements. The applicant has allowed for 20 1100L Eurobins and assumed 50% general refuse and 50% recycling and 4no. collections a week.
- 8.6.48 With the detailed element of the application there would be an internal large waste store within the lower ground floor of Building 2. A service yard would connect to the southern road, allowing larger goods vehicle movements and servicing activities to be separated from the pedestrianised Arrival Square. The service yard would be situated along the west elevation of building 4, providing separation from public spaces to allow for segregated goods movement and access. The data centres would have an internal refuse store served by a loading bay.
- 8.6.49 In terms of laboratory and building servicing, in order to support the functionality of the laboratory-enabled office space, a number of discreet functions would need to be located externally to the buildings. This is due to requirements of health and safety, loading and access. The following support would be required to be located within the service yards:
- External gas cylinder storage
  - External liquid nitrogen tank
  - Generator
- 8.6.50 It is important that these small-scale items are considered within the landscape and architectural strategy as a whole, and the basic nature of their functions would be screened to ensure they appear part of the design language. The development proposal would also produce waste during construction works and the Council will require the preparation of a Site Waste Management Plan (SWMP) to be re-secured via planning conditions 10 and 11 should planning permission be granted.

## **8.7 Flood Risk and Drainage**

- 8.7.1 The application is supported by a revised Flood Risk Assessment, Sitewide Drainage and SuDS Strategy – Addendum, and a Drainage and SuDS Strategy – Phase 1 Supplementary

Addendum. These documents set out how the drainage strategy for the site (excluding the gyratory, which is unchanged) has been revised to reflect the changes to the scheme. They follow a pre-application meeting held with Hertfordshire County Council as Lead Local Flood Authority (LLFA) in October 2025 to discuss the revisions to the scheme. It should be noted that the detailed drainage scheme for the various parts of the wider site would still be required to accord with the relevant conditions, the technical requirements of which remain relevant and are not proposed to be altered.

- 8.7.2 The application site is located entirely within Flood Zone 1. The site has been identified as being at a low risk of flooding from rivers. There is a low risk of flooding from pluvial sources; with small isolated areas of high risk of flooding located in Gunnels Wood Road and at the underpass on A602. These areas are proposed to remain as existing. It has been identified that there is a low risk of flooding from groundwater sources. The proposed development has been identified as being at a low risk of flooding from all artificial sources.
- 8.7.3 The development of the site as a life science campus with data centres is therefore appropriate as set out by the 'flood risk vulnerability classification' contained within the Planning Practice Guidance. The site would be delivered with new separate foul and surface water networks. The proposed surface water drainage strategy has been designed to withstand flooding up to and including the 1-in-100 year +40% climate change return period and the network would discharge via shallow and deep infiltration with an overflow at QBar (Mean annual flood) to the public sewer. The Drainage and SuDS Strategy set out further details in respect of surface water and foul water drainage for both the detailed and outline phases.
- 8.7.4 The Environment Agency and Hertfordshire County Council as Lead Local Flood Authority have continued to raise no objection to the proposed changes, subject to the existing drainage and flood conditions being transferred over to any amended planning permission.

## 8.8 Trees, Ecology and Biodiversity

### *Trees*

- 8.8.1 Policy NH5 of the Local Plan (2019) states that development proposals will be expected to protect and retain individual trees within the development site and should include new planting where appropriate. Tree retention is prioritised at key internal green infrastructure links, including the eastern and western site boundaries. The below table taken from the updated Landscape Masterplan illustrates the extent of trees that are proposed for removal. This would be carefully managed, and existing trees in close proximity to proposed buildings managed appropriately.

<b>EXISTING</b>	
Tree	Remove (No.)
Category A	1
Category B	301
Category C	364
<b>TOTAL</b>	<b>665</b>
<b>PROPOSED</b>	
Tree	Proposed (No.)
<b>TOTAL</b>	<b>728</b>

Figure 7 Revised Tree Strategy

- 8.8.2 Surface treatments would be carefully selected to ensure no damage to tree root networks, and no dig construction methods. Existing soft landscape extent beneath retained trees would be maximised, and elsewhere permeable surfaces are proposed. In the landscape design, two significant areas of existing trees are proposed to be retained and integrated into the overall layout. This approach would reduce the total number of trees to be removed compared to the original planning permission, from an initial 733 down to 665, resulting in a preservation of 68 additional trees compared with the original scheme. This adjustment not only minimises environmental impact but would also enhance the site's aesthetic and ecological value.
- 8.8.3 The existing tree canopy covers 14.7% of the site area. With the assumption that all proposed trees would reach a moderate mature canopy size, the estimated mature canopy coverage would increase to 20.1% of the site area, reflecting a 36.4% increase in coverage. This calculation is based on the average mature canopy size of the proposed tree species, with the assumption that no more than 15% of the canopy of medium-sized trees would overlap. This increased canopy coverage would be achieved by planting trees at appropriate spacing and ensuring proper care to support their long-term health and growth.
- 8.8.4 The overall tree strategy would define the spaces using the trees character, shape, texture and colour. The character of the trees would be chosen in accordance with the varied functions of each space and highlights the relationship between each space using landmark trees. The tree palette would incorporate native trees to support wildlife and to enhance the existing trees along with SuDS friendly trees, street trees as connectors and character feature trees that would suit each character of the designed areas.
- 8.8.5 Adding multi stem trees and variety with resilient tree species would create a naturalistic feeling to the Campus. The site wide green infrastructure networks would be reinforced through proposed tree canopy corridors. Species that are climate adaptive, robust, drought tolerant and suitable for their setting are proposed, along with a mix of evergreen and deciduous trees, with year-round interest in the form of leaf colour, flower and bark. Several species of trees are proposed with a delicate canopy to allow sunlight to penetrate through. A mix of native and non-native tree species which would provide a source of nectar, pollen and other food sources are proposed.
- 8.8.6 The Council's Arboriculture and Conservation manager has raised no objection to the proposed tree strategy for the amended scheme. The replacement trees would be of high quality, whereas many of those to be removed are in poor condition so there would be a significant qualitative improvement. The proposed development would also provide the conditions (e.g. soil quality, spacing) to allow the new trees to grow well and reach the appropriate growth / girth levels quickly. There may also be scope for additional tree planting off site as part of the Biodiversity Net Gain offset payment. The maintenance of the public realm including the trees would be the responsibility of the Management Company secured as part of the S106 Agreement and not the Council.
- 8.8.7 It is considered the proposed tree planting strategy for the amended scheme would continue to comply with Local Plan policy NH5 'Trees and Woodland' and is considered acceptable. The existing planning conditions relating to trees would also be transferred over to any new planning permission.

#### *Biodiversity*

- 8.8.8 The Environment Act (2021), paragraphs 187(d) and 193 of the NPPF and accompanying Planning Practice Guidance and Local Plan policy SP12 require the Council to achieve measurable net gains in biodiversity at development sites and across the Borough. To achieve a biodiversity net gain, a development must deliver a minimum of 10% net gain post development, when compared with the pre-development baseline. While every grant of planning permission in England is deemed to have been granted subject to the biodiversity

gain condition, commencement and transitional arrangements, as well as exemptions, mean that certain permissions are not subject to biodiversity net gain.

- 8.8.9 Biodiversity net gain has only been commenced for planning permissions granted in respect to an application made on or after 12 February 2024. Permissions granted for applications made before this date are not subject to biodiversity net gain and the original planning application was submitted in April 2023. It was not therefore subject to the biodiversity gain condition. Furthermore, biodiversity net gain does not apply to section 73 permissions where the original permission which the section 73 relates to was either granted before 12 February 2024 or the application for the original permission was made before 12 February 2024.
- 8.8.10 In this case, as the original application was made before 12 February 2024 biodiversity net gain does not apply to this amended scheme. In addition, since granting planning permission for the original proposal the Council has revoked the Biodiversity SPD. Development plan policies which are relevant to the assessment of this latest proposal include the relevant paragraphs from the NPPF covering conserving and enhancing the natural environment (chapter 15) and Local Plan policy SP12.
- 8.8.11 The application has been supported by an updated Biodiversity Net Gain Assessment by SLR and a Biodiversity Metric. The assessment of the proposed development against the current baseline indicates that there would be an increase in biodiversity performance of the site of approximately 5.74% in habitat units and 6.94% in hedgerow units. This would be subject to appropriate planting plans and management plans being developed to optimise the delivery of biodiversity performance on the site and to realise its intended out-turn condition. The management plans should be secured for at least 30 years and the applicant had advised they are committed to delivering these plans and securing these commitments post-consent.
- 8.8.12 It should be noted that under the S106 Agreement pursuant to the May 2024 Permission, a payment of £29,849.97 towards offsite biodiversity enhancements was agreed. This was calculated based on 5.34 area habitat units, which equates to 10.23% of existing baseline units. Biodiversity net gain condition 31 is therefore proposed to be amended to refer to the revised habitat units set out in the updated Assessment. Condition 32 is proposed to be deleted as this duplicates requirements under Condition 31 and is not considered necessary. Conditions 33 and 34 relating to the provision of swift boxes are also to be retained on any amended planning permission.
- 8.8.13 The biodiversity financial contribution secured via the s106 legal agreement will be spent on improving biodiversity on another site(s) in Stevenage to be agreed with the Council's Green Spaces Development officer. The biodiversity net gain on the application site would be subject to the development of landscape planting plans and site management plans to secure the predicted level of biodiversity delivery. On this basis, the amended proposal would continue to achieve a 10% biodiversity net gain notwithstanding the fact there is no policy requirement to do so in this instance.

#### *Ecology*

- 8.8.14 The original application was accompanied by an Ecological Impact Assessment and a Great Crested Newt Scoping and eDNA Survey Technical Note by SLR Consulting Ltd. The Ecological Impact Assessment reviewed the potential ecological impacts on the redevelopment of the site. The application site extends to approximately 17.37 hectares (ha), and comprises a range of habitats, predominantly neutral grassland, mixed scrub, and modified grassland, surrounding a number of existing research buildings. The survey, alongside details received from a desk top study confirmed that the site has potential to support the following protected and priority species including:

- moderate potential to support notable plant species
- high potential to support notable invertebrates
- moderate potential to support reptile species
- low potential to support great crested newts
- moderate potential to support notable bird species
- moderate potential to support commuting/foraging bats
- moderate potential to support roosting bats; and
- high potential/confirmed presence of commuting badgers.

8.8.15 Further surveys to assess the presence/likely absence of commuting/foraging bat species, reptiles, and great crested newts were recommended, with precautionary actions recommended for priority habitats, nesting birds, badger and hedgehog. Opportunities for biodiversity enhancement were also identified and included invertebrate habitat features, wildlife-friendly landscaping, and bird and bat boxes. Updated planning conditions 31 'Biodiversity Net Gain Management Plan' and 41 'Ecological Enhancements' would be carried forward with any amended planning permission and would secure the long-term management and ecological enhancement of the site.

8.8.16 With the implementation of appropriate ecological mitigation, compensation and the proposed biodiversity enhancement into the development design and landscaping, it is considered that the revised development proposal would result in an overall enhancement to the biodiversity and ecological value of the application site, improve access to nature and ensure compliance with Section 15 of the NPPF and policies SP12 and NH5 of the Local Plan (2019).

## 8.9 External Lighting

8.9.1 An updated Lighting Strategy has been submitted which seeks to develop a lighting approach to not only address the technical requirements of the proposed development, but to also ensure a multi-faceted experience for users of the Campus. The strategy follows the overarching principles established through the original strategy, updated to reflect the changes to the scheme, such as the new location of buildings and new landscaping. Condition 42 is to be amended accordingly to refer to the revised document. The lighting strategy has been amended further following comments by the Council's Environmental Health Officer, who is now satisfied with the submitted details.

8.9.2 The external lighting strategy would continue to apply different lighting approaches to different 'zones' across the Campus, to create a sense of hierarchy and usage to the various areas and guide the users around the site to points of interest. The lighting design would be respectful to the surrounding environment and would also be controlled via time clocks to minimise the impact on wildlife. All guidelines and recommendations for lighting considerations would be followed (CIBSE - LG6: A4.3, A4.8, A4.9, ILP, Guidance Note 08/18).

8.9.3 Following advice from the Council's Environmental Health Officer, the Lighting Strategy and the proposed wording for condition 42 has been amended further to address their concerns:

*"The development to which this permission relates in respect of the Detailed Area and each Development Zone as agreed pursuant to condition 4, shall be carried out in accordance with the recommendations set out within the Exterior Lighting Strategy by FPOV (ref: J4431-SL-5101-03, January 2026) as approved or any alternatives to be submitted to and approved by the Local Planning Authority."*

8.9.4 Environmental Health have confirmed this condition would provide the Planning Authority with sufficient control over external lighting and it is considered the external lighting strategy would continue to comply with Local Plan policy FP7 'Pollution' with regards to limiting light pollution and protecting wildlife.

## 8.10 Climate Change Mitigation

- 8.10.1 Policy FP1 of the adopted Local Plan (2019) stipulates that planning permission will be granted for development that can incorporate measures to address adaptation to climate change. New developments will be encouraged to include measures such as:
- Ways to ensure development is resilient to likely variations in temperature
  - Reducing water consumption to no more than 110 litres per person per day, including external water use
  - Improving energy performance of buildings
  - Reducing energy consumption through efficiency measures
  - Using or producing renewable or low carbon energy from a local source; and
  - Contributing towards reducing flood risk through the use of SuDS or other appropriate measures.
- 8.10.2 Under the Local Plan review, Policy FP1 has been revised to cover sustainable drainage and Policy SP1: climate change is the new relevant policy in this regard. The fundamental objective of Policy SP1 remains the same as previous policy FP1, however, it sets out in more detail the objectives of adapting to climate change. This policy requires, amongst other things emission reduction targets, prioritising active travel and public transport, water usage targets, rainwater harvesting, grey water recycling, use of sustainable materials and practices on site, ultra-low and zero carbon combined heat and power systems and urban greening (green roofs and walls).
- 8.10.3 This policy is further supported by a suite of new climate change policies, CC1 through to CC6 which require developments to incorporate a range of climate mitigation measures where appropriate. Emerging policy GD2 'Design certification' also strongly supports development proposals which demonstrate that they have been designed to achieve a rating of excellent or higher against the relevant BREEAM standard.
- 8.10.4 The Council's Design Guide SPD (2025) sets out additional requirements with respect to climate change. The guide states that all developments are required to make efforts to minimise energy usage and to incorporate methods of using renewable energy, including:
- reducing energy demand
  - using passive environmental systems, e.g. natural ventilation
  - daylighting and passive solar gains
  - using high levels of insulation and air tightness in the fabric of the building
  - specifying energy efficient services, controls and appliances
  - implementing water recycling and the provision of water butts
  - using renewable energy
  - using low/zero carbon technologies to provide as much of the energy load as is technically and economically feasible, minimising use of fossil fuels; and
  - using efficient fossil fuel technologies, such as Combined Heat and Power and condensing boilers.
- 8.10.5 The vision and aspiration of the applicant is to create a truly sustainable masterplan with low carbon and energy efficient buildings, that responds to the changing trends and needs of tenants and provides climate resilience. The key themes on multiple scales have been explored and embedded in the design strategy where possible. There is commitment to further explore the Net Zero Carbon pathway and focus on delivering Net Zero Carbon ready buildings, focus on benefits of following circular economy principles, setting operational energy, embodied carbon, biodiversity net gain and water targets to further enhance the building performance and future-proof the development.
- 8.10.4 The application is accompanied by a revised Sustainability Strategy and a revised Energy Statement to reflect the changes to the scheme. The focus of these are the alterations in the Detailed Area to include the data centres and changes to Buildings 2 and 4. These

documents set out that the Detailed Buildings have been designed to achieve BREEAM Excellent and accord with the sustainability principles of the Development Plan. The approach to the data centres in particular, including their use of energy and water has been detailed, supplemented by the further sustainability information set out in the Design and Access Statement. Condition 38 is proposed to be amended accordingly to include reference to the above revised documents along with the Design and Access Statement and incorporate reference to the data centres.

8.10.5 From the overall masterplan to the detailed building designs, the following measures would be incorporated to mitigate the impact of climate change:

- Proposed development to achieve BREEAM 'Excellent' rating with an aspiration to achieve 'Outstanding'
- Adopt a fabric first building approach
- Focus on health and wellbeing for users of the Campus (WELL principles, good daylighting, low CO<sub>2</sub>/ VOC levels, good air quality, views of sky, biophilia, social value)
- Biodiversity Net Gain and use of SuDS
- Landscape design (embedding environmental benefits)
- Animating outdoor spaces with environmental strategies
- On-site energy generation
- Energy efficiency (target net zero ready in operation and EPC A rating)
- Upfront Carbon (low carbon materials, whole lifecycle carbon approach, minimise construction and excavation waste)
- Whole life carbon analysis and design approach
- Low carbon mobility (encourage use of EVs and other low carbon transport)
- Circular economy principles (sharing, reusing, repairing, recycling materials)
- Water efficiency (potable water use – Labs: <13 l/p/day (RIBA 2025), Data Centres: best practice Water Use Efficiency (WUE), BREEAM WAT-01 credit outstanding, flood protection 1:100 year event + 40%)

#### *Data Centres*

8.10.6 Data centres are among the most energy-intensive building types, with a significant proportion of their energy demand dedicated to cooling. Selecting the most efficient cooling solution is therefore critical to reducing operational energy use and environmental impact. A careful evaluation was carried out by the applicant to compare available cooling technologies. The assessment considered power usage effectiveness (PUE), water usage effectiveness (WUE), and opportunities for free cooling and waste heat recovery. The table below summarises the options reviewed.

8.10.7 The 'Direct Evaporative Air Cooling' was selected as the preferred solution. This system offers the highest annual efficiency compared to other technologies, combining low energy and water use with the potential for free cooling and future waste heat recovery:

- Direct evaporative Air Handling Units (AHU's) with variable air volume conditioning would provide cooling and ventilation air to the data processing areas and equipment rooms.
- Cooling would be based on ambient wet bulb (WB) temperature and additional cooling would be provided by evaporative pads utilising water as cooling media.
- This system is designed to offer the highest efficiency (over other cooling technologies) on an annual basis.

Cooling System	Description / Working Principle	Power Use (PUE)	Water Use (WUE)	Other Notes
<b>1. Water Cooled Chiller (Cooling Tower)</b>	Uses evaporation to cool a water loop from data centre cooling equipment	Low	High	Waste heat can be reclaimed
<b>2. Air Cooled Chiller</b>	Refrigerant-based air conditioning	High	None	Has free cooling potential
<b>3. Indirect Evaporative Air Cooling</b>	Uses evaporation to indirectly cool the air supply to the data centre	Low	High	Lower energy efficiency than direct evaporative cooling
<b>4. Adiabatic Air-Cooled Chiller</b>	Uses evaporation alongside refrigerant air conditioning during peak hot periods	Moderate	Low	Can deliver free cooling and waste heat abstraction; not the most efficient technology
<b>5. Direct Evaporative Air Cooling</b>	Uses evaporation to directly cool the air supply to the data centre during peak hot periods	Low	Low	Higher efficiency than indirect evaporative cooling; can deliver free cooling; most energy-efficient technology; waste heat abstraction possible in future

Figure 8 Data Centre Cooling Technology Options

- 8.10.8 As set out in paragraph 8.10.6 data centres are among the most resource-intensive building types, consuming large amounts of energy and water to maintain optimal conditions for continuous server operation. Cooling systems, power conversion, and environmental control are major contributors to this demand. Without intervention, these facilities can have a significant environmental footprint. The design approach focuses on reducing this impact through a combination of energy-saving and water-saving strategies that would improve operational efficiency while meeting best practice standards. These measures would include optimising cooling systems, reclaiming waste heat, and minimising water use through advanced evaporative technologies and recovery processes.
- 8.10.9 The below diagram summarises the strategies adopted for energy efficiency and water conservation. Together, these measures would ensure that the data centres would operate with the highest possible performance while significantly reducing their environmental impact. In terms of future potential for heat export from the data centres, the applicant has advised if a future district heat network should become available and is ready to connect prior to first occupation of the data centre, they can engage with that provider to explore the feasibility of delivering a suitable connection.

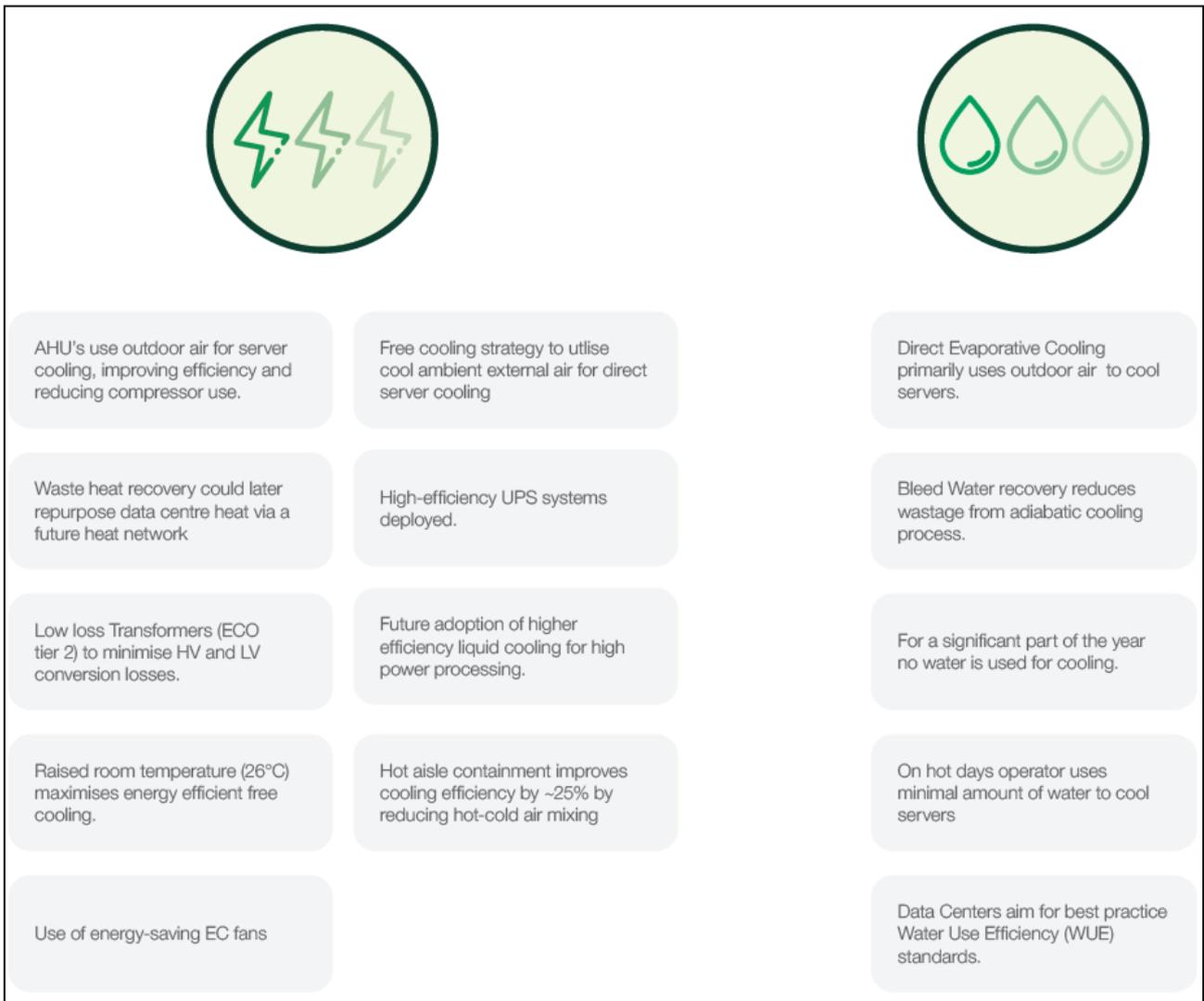


Figure 9 Data Centre Energy Efficiency and Water Conservation Measures

8.10.10 With the adoption of the above measures, it is considered the proposed development would continue to be exemplary in terms of its sustainability and promotion of health and wellbeing. It is considered the information provided within the application demonstrates that the amended scheme would continue to accord with the requirements of policies SP2 and FP1 of the Local Plan (2019) and SP1 of the Local Plan review in relation to sustainable construction and climate change mitigation.

## 8.11 Pollution and Hazardous Substances

8.11.1 Liquid Nitrogen if used within laboratories is considered a potentially hazardous substance and therefore the application proposal would need to be considered under Local Plan (2019) Policy FP6 'Hazardous Installations'. The policy states planning permission will be granted for development proposals involving the use, storage or movement of hazardous substances where:

- There are no additional health and safety risks to users of the site or surrounding area;
- There are no additional threats to the local environment; and
- The proposal does not cause long term land contamination.

8.11.2 In terms of Liquid Nitrogen storage tanks, these would be located within a secure storage compound within a secure delivery zone on site for authorised personal only. The storage zone would be located outdoors within secure service areas. A full health and safety assessment of the proposals would be carried out in compliance with British Compressed Gas Association (BCGA) and the UK Health and Safety Executive (HSE) guidance.

8.11.3 In terms of oil/chemical storage tanks, all above ground oil and chemical storage tanks would be sited on an impervious base and surrounded by a liquid tight bund wall. The bunded area would be capable of containing 110% of the volume of the tank(s) and all fill pipes and sight gauges would be enclosed within the curtilage. No drainage outlet would be provided, and the vent pipe would be directed downwards into the bund. It is considered the above arrangements are acceptable and would meet the requirements of Local Plan Policy FP6 'Hazardous Installations'.

## **8.12 Air Quality**

8.12.1 The application is supported by a revised Air Quality Assessment (AQA) prepared by DustScan. It assesses the changes to the scheme and finds that, as there would be 12% overall decrease in forecast development vehicle trips daily compared with the approved scheme, it is not necessary to assess this element in detail as any such effects would be less than that already found acceptable under the May 2024 Permission. The AQA then considers the potential effects of back-up generators associated with the scheme, primarily for the data centres. It finds that there would be no significant short-term or long-term impacts resulting from the operation of the proposed generators, and that there would not be any further mitigation required.

8.12.2 The Council's Environmental Health Officer believes this conclusion is reasonable given the assessment approach employed, however recommends an additional condition is imposed on any future grant of planning permission to prevent unmitigated plant to be installed and operated for extended periods without an appropriate Local Planning Authority control. On this basis, the applicant is proposing the following new condition to address the matters raised in relation to back up generators. This is based on the Air Quality Assessment so ensures that it would be tied back to that document, which addresses the control of the back-up generators (usage / testing).

*"Testing of any back-up power, life safety and standby power generators shall only be undertaken in accordance with the scenarios set out in paragraph 3.1.2 of the Air Quality Assessment dated December 2025 or any alternatives to be submitted and approved by the Local Planning Authority. Testing of back-up generators shall only be undertaken between the hours of 07:00-23:00. Generators shall otherwise only be used in emergency situations. Data Centre back-up power generators shall incorporate Selective Catalytic Reduction".*

8.12.3 Environmental Health have confirmed that the above condition would provide the necessary control and therefore it can be concluded that the amended scheme is not considered to conflict with national and local air quality planning policy (Local Plan policies FP7 and FP8) and would not result in significant impacts on air quality.

## **8.13 Noise Impact**

8.13.1 The application is supported by a revised Planning Noise report and addendum note, which assesses the potential noise impacts associated with the revised scheme, along with the inclusion of the data centres, with their associated plant and back-up generators. It sets out the recommended plant noise limits, updated to reflect the revisions to the scheme and including when back-up generators are in use, which the proposed development would need to comply with and which it demonstrates would ensure the scheme operates within acceptable levels.

8.13.2 Following advice from the Council's Environmental Health Officer, the applicant has sought to separate out the noise of back-up generators and life safety systems that would operate in emergency scenarios, from the typical plant operating day to day, to address the issues raised and to inform the proposed wording for amended noise condition 40:

*“Before any item of plant or machinery is used in connection with the data centres hereby approved, it shall be installed and operated in accordance with a written scheme first agreed in writing with the Local Planning Authority. The scheme shall set out measures both technical and managerial that will limit the acoustic impact of the plant and/or machinery so that its Rating Level does not exceed those values set out in Planning Noise Report authored by Sandy Brown Ltd. (reference 23023-R06-B, Version B, dated 15/12/2025 and addendum note reference M011-A, dated 27/2/2026) as assessed within the curtilage of any dwelling or other noise sensitive receptor having regard to the definitions and assessment approach set out in British Standard BS4142: 2014 + A1: 2019”.*

- 8.13.3 At the time of writing this report, the precise wording of this condition is still to be confirmed with the applicant. An update will be provided to Members at the meeting. Subject to an amended planning condition securing updated noise mitigation in relation to the data centres, it is considered the revised scheme would not have an unacceptable impact on the general amenity of the wider area in terms of noise pollution. It would therefore remain in accordance with Local Plan Policy FP7 ‘Pollution’ in relation to noise.

#### **8.14 Ground Conditions**

- 8.14.1 The original application included a Phase I Preliminary Risk Assessment which provided an assessment of the status of the site and the potential risk of contamination. The Assessment set out that there was a ‘Low to Moderate’ level of risk to future site users from Made Ground Soils, and a ‘Moderate’ risk associated with ground gases. All other potential contaminant sources were determined as having a ‘Low’ risk to future site users and controlled waters as part of the proposed development.
- 8.14.2 The Council’s Environmental Health Officer advised existing planning conditions (36 and 37) relating to soil contamination remain appropriate and raised no objection to their continued use with regards to the revised proposal. The amended scheme continues to accord with Policy FP5 of the Local Plan.

#### **8.15 Residential Amenity**

- 8.15.1 The area surrounding the site comprises a range of employment and other commercial uses, specifically the GSK Campus which is located to the south. The A1(M) is to the west, including Junction 7 with the A602. Beyond the A1(M) is a Novotel Hotel with the remaining area to the west comprising Knebworth House and agricultural land. To the east of the site is the East Coast Mainline railway, beyond which lies Roebuck Retail Park and Broadwater Retail Park. The wider Gunnels Wood Employment Area is located to the north of the site, beyond the A602.
- 8.15.2 Due to the location of the site away from the residential areas of the town, it is not considered the proposed buildings would raise any residential amenity issues in terms of outlook, light, overbearing impact and privacy due to the siting of the development on the edge of town within an existing employment area. The proposal is considered acceptable in this regard and in accordance with Local Plan Policy GD1 ‘High Quality Design’.

#### **8.16 Planning Obligations**

- 8.16.1 The following planning obligations would continue to be attached to any amended planning permission via the existing s106 agreement dated 30 May 2024:
- S278 Agreement of the Highways Act 1980 (covering the new Gunnels Wood Road/A602 gyratory, junction improvements and public realm works on highway verge land adopted by HCC as Highway Authority)
  - £6000 Travel Plan evaluation and support fee

- £29,849.97 to provide an offsite biodiversity offset
- Local Employment and Apprenticeships
- £275,000 towards a town wide cycle hire scheme, including between the application site and railway station
- Management Company to manage areas of un-adopted public realm
- s106 monitoring fee

## 8.17 Other Matters

### Community Infrastructure Levy

- 8.17.1 The Council adopted CIL on 1 April 2020 and the CIL Charging Schedule specifies a payment for new floorspace in line with the following rates (plus appropriate indexation):

Development Type	CIL Rate (£ per square meter)	
	Zone 1: Stevenage Central, Stevenage West Urban Extension and North of Stevenage Extension	Zone 2: Everywhere else
Residential		
Market housing	£40/m <sup>2</sup>	£100/m <sup>2</sup>
Sheltered housing	£100/m <sup>2</sup>	
Extra care housing	£40/m <sup>2</sup>	
Retail development	£60/m <sup>2</sup>	
All other development	£0/m <sup>2</sup>	

- 8.17.2 CIL is a non-negotiable charge. The exact charge will be determined by the Council's CIL officer after an application has been granted in accordance with the CIL Charging Schedule and the Community Infrastructure Levy Regulations 2010 (as amended). Opportunities for relief or exemption from the CIL charge exist and will be taken into account in the calculation of the final CIL charge.
- 8.17.3 CIL replaces the need for S106 agreements to specify financial and/or land contributions for non-site-specific infrastructure projects. This allows infrastructure to be planned on a borough-wide scale rather than on a site-by-site basis as mitigation against the impacts of individual proposals. A CIL Form 1: Additional Information has been submitted along with the application. Although falling within planning Use Class E 'commercial, service and business' use, the buildings would not be in retail use and therefore would be liable for CIL at £0m<sup>2</sup> as 'other development' under the CIL charging schedule.

### Equality, Diversity and Human Rights

- 8.17.4 Consideration has been given to Articles 1 and 8 of the First Protocol of the European Convention on Human Rights. It is not considered that the decision would result in a violation of any person's rights under the Convention.
- 8.17.5 When considering proposals placed before the Council as Local Planning Authority, it is important that it is fully aware of and has themselves rigorously considered the equalities implications of the decision that they are taking. Therefore, rigorous consideration has been undertaken by the Council as the Local Planning Authority to ensure that proper appreciation of any potential impact of the proposed development on the Council's obligations under the Public Sector Equalities Duty.
- 8.17.6 The Equalities Act 2010 requires the Council when exercising its functions to have due regard to the need to (a) eliminate discrimination, harassment, victimisation and other

conduct prohibited under the Act; (b) advance equality of opportunity between persons who share a relevant protected characteristic and persons who do not share it and (c) foster good relations between persons who share protected characteristics under the Equality Act and persons who do not share it. The protected characteristics under the Equality Act are: age; disability; gender reassignment; marriage and civil partnership; pregnancy and maternity; race; religion and belief; sex and sexual orientation.

- 8.17.7 In terms of inclusive access, the proposed buildings have been designed to be fully accessible and inclusive. All spaces in the new buildings would be accessible; the floors and thresholds would be level and lifts would serve all floors. The routes into the building would be clear and signed and demarcated appropriately using landscape treatments. There would be no abrupt changes in levels on the approach to the proposed buildings. Disabled parking spaces would be provided within the MSCPs at ground floor level. The design proposals have been developed with reference to Approved Document Part M (AD-M) and BS8300:2018 'Design of an Accessible and Inclusive Built Environment.'
- 8.17.8 Level access would be provided to the development at all pedestrian access points. Dropped kerbs and tactile paving would be provided at junctions / crossings in the area. The design of the scheme provides a safe, secure and attractive environment. The immediate connectivity of a development site includes factors that relate to pedestrian and cycle access as well as access by wheelchair users. In terms of pedestrian facilities in the area, footways are generally of a high standard, are level / trip free and well lit.
- 8.17.9 It is considered that the decision has had regard to this duty. The development would not conflict with either Stevenage Borough Council's Equality Policy or the commitments set out in our Equality Objectives and would support the Council in meeting its statutory equality responsibilities.

## **9. CONCLUSIONS**

- 9.1 Planning permission has been granted for a world class, life science campus known as the 'Elevate Quarter' which would provide state-of-the-art laboratory and associated facilities on land adjacent to the existing GSK campus in Stevenage, along with two extensions to the existing GSK Campus. This application seeks to amend this permission with a series of changes which are intended to reflect the current market, in particular the reduction in demand for 'life science' floorspace and increasing demand for data centres as UK critical infrastructure. The scheme would still provide for a life science campus with significant life science floorspace included.
- 9.2 Elevate Quarter would continue to build on Stevenage's existing reputation as a leading life science hub to meet the demand within the UK for new research and development opportunities in the sector, as well as the growing need for data centres. The aspiration of the applicant continues to embody creating a global exemplar for sustainability that would enable the next generation of innovators to thrive in Stevenage.
- 9.3 The policies considered to be most relevant for determining this application are all considered to be consistent with the most recent revision of the NPPF and are therefore considered to be up to date. Accordingly, Paragraph 11(d) of the NPPF is not engaged and the application falls to be determined against a straightforward planning balance.
- 9.4 This hybrid s73 application seeks amended detailed and outline planning permission for the phased development of a new Life Science Campus at the site incorporating two new data centres. The detailed element of the application comprises the construction of two life science buildings 2 and 4, two data centres, two substations, multi-storey car park 1, two surface carparks and the creation of a new gyratory on Gunnels Wood Road with associated landscaping and other infrastructure works. The outline element of the

application is for the remainder of the Campus and consists of further employment floorspace and parking (MSCP2), extensions to existing GSK buildings, landscaping and associated infrastructure. All matters are reserved for future submission and assessment.

- 9.5 The proposed development as amended continues to accord with the allocation of the site in the Local Plan which is for employment and ancillary uses of transformational scale (Policy EC1). The Local Plan sets a target of 50,000m<sup>2</sup> of floorspace, but acknowledges that the site is likely to have capacity to accommodate a greater quantum. The documentation and evidence submitted as part of this application demonstrates that the proposed quantum of floorspace could still be accommodated within the site when having regard to all relevant considerations (such as transportation and highways, townscape and heritage, flooding and ecology).
- 9.6 The proposed development as amended continues to accord with the strategic framework for development as established by the Local Plan. It also accords with the detailed design policies within the Local Plan and the associated guidance contained within the various Supplementary Planning Documents.
- 9.7 The amended scheme would continue to generate a number of significant economic benefits which weigh heavily in favour of the grant of planning permission. It would elevate Stevenage to a leading hub for life sciences within the UK, building on its established sector and range of occupiers (including the existing GSK Campus). It would help to meet the employment floorspace targets established within the Local Plan and generate a range of associated benefits including new high skilled jobs, enhanced training and investment.
- 9.8 The co-location of data centres on the campus would allow Stevenage to sit at the forefront of life science innovation in the UK, future proofing the cluster as technological needs expand over time. The centres would facilitate the research occurring at the campus by providing access to high-quality processing power. These co-location benefits would extend beyond the companies at the campus. Any Stevenage company, or company from further afield, that is looking to utilise high processing power would be able to capitalise on the opportunity of this data centre provision. This would mean the benefits of the scheme would be felt across other industries, indirectly supporting further innovation and economic benefits beyond life sciences alone.
- 9.9 Overall, the amendments to the scheme would make the proposals more robust to future market changes, whilst directly supporting the life sciences innovation campus and ensuring a wide range of firms and industries have the opportunity to drive innovation and benefit. Given these significant planning and economic benefits weighing in favour of the proposal and the absence of policy conflict with the Local Plan (2019), the Council's Supplementary Planning Documents, the NPPF (2024) and PPG, planning permission should be granted in accordance with Section 38(6) of the Planning and Compulsory Purchase Act 2004.

## **10. RECOMMENDATIONS**

- 10.1 That planning permission be GRANTED subject to the imposition of suitable safeguarding conditions, the detail of which would be delegated to the Assistant Director of Planning and Regulation in liaison with the Council's appointed solicitor.
- 10.2 Authority would be given to the Assistant Director of Planning and Regulation in consultation with the Chair of Planning Committee, to amend or add to the suggested draft conditions set out in this report, prior to the decision notice being issued, where such amendments or additions would be legally sound and most effectively deliver the development that the Planning Committee has resolved to approve. These suggested conditions are as follows:

## 1 **Approved Parameter Plans (Outline)**

The submission of reserved matters within any Development Zone shall be in accordance with the following approved parameter plans unless otherwise agreed in writing by the Local Planning Authority:

SEQ-HBA-SW-ZZ-DR-A-080020 Rev: C01; Ref: SEQ-HBA-SW-ZZ-DR-A-080021 Rev: C01

**REASON:-** For the avoidance of doubt and in the interests of proper planning.

Any request for an amendment to an approved parameter plan shall be accompanied by a report confirming that there are no new or different significant environmental impacts to those already assessed or by an appropriate report (or reports) which assesses any new or different significant environmental impacts.

## 2 **Approved Plans for Detailed Area**

The development hereby permitted for the Detailed Area shall be carried out in accordance with the following unless otherwise agreed in writing by the Local Planning Authority:

25021-EXA-ZZ-GF-DR-L-00101 Rev P01; 25021-EXA-ZZ-GF-DR-L-00110 Rev P01;  
25021-EXA-ZZ-GF-DR-L-00111 Rev P01; 25021-EXA-ZZ-GF-DR-L-00112 Rev P01;  
25021-EXA-ZZ-GF-DR-L-00113 Rev P01; 25021-EXA-ZZ-GF-DR-L-00114 Rev P01;  
25021-EXA-ZZ-GF-DR-L-00115 Rev P01; 25021-EXA-ZZ-GF-DR-L-00116 Rev P01;  
25021-EXA-ZZ-GF-DR-L-00117 Rev P01; 25021-EXA-ZZ-GF-DR-L-00118 Rev P01;  
25021-EXA-ZZ-GF-DR-L-00119 Rev P01; 25021-EXA-ZZ-GF-DR-L-00120 Rev P01;  
25021-EXA-ZZ-GF-DR-L-00121 Rev P01;

SEQ-HBA-SW-ZZ-DR-A-080012 Rev C01; SEQ-HBA-SW-ZZ-DR-A-080100 Rev C01

SEQ-HBA-B2-B1-DR-A-081100 Rev C01; SEQ-HBA-B2-00-DR-A-081101 Rev C01; SEQ-HBA-B2-01-DR-A-081102 Rev C01; SEQ-HBA-B2-02-DR-A-081103 Rev C01; SEQ-HBA-B2-03-DR-A-081104 Rev C01; SEQ-HBA-B2-04-DR-A-081105 Rev C01; SEQ-HBA-B2-05-DR-A-081106 Rev C01; SEQ-HBA-B2-RF-DR-A-081107 Rev C01; SEQ-HBA-B2-XX-DR-A-081200 Rev C01; SEQ-HBA-B2-XX-DR-A-081201 Rev C01; SEQ-HBA-B2-XX-DR-A-081202 Rev C01; SEQ-HBA-B2-XX-DR-A-081203 Rev C01; SEQ-HBA-B2-XX-DR-A-081300 Rev C01; SEQ-HBA-B2-XX-DR-A-081301 Rev C01

SEQ-HBA-B4-00-DR-A-082100 Rev C01; SEQ-HBA-B4-01-DR-A-082101 Rev C01; SEQ-HBA-B4-02-DR-A-082102 Rev C01; SEQ-HBA-B4-03-DR-A-082103 Rev C01; SEQ-HBA-B4-04-DR-A-082104 Rev C01; SEQ-HBA-B4-05-DR-A-082105 Rev C01; SEQ-HBA-B4-RF-DR-A-082106 Rev C01; SEQ-HBA-B4-XX-DR-A-082200 Rev C01; SEQ-HBA-B4-XX-DR-A-082201 Rev C01; SEQ-HBA-B4-XX-DR-A-082202 Rev C01; SEQ-HBA-B4-XX-DR-A-082203 Rev C01; SEQ-HBA-B4-XX-DR-A-082300 Rev C01; SEQ-HBA-B4-XX-DR-A-082301 Rev C01

SEQ-HBA-D1-00-DR-A-085100 Rev C01; SEQ-HBA-D1-01-DR-A-085101 Rev C01; SEQ-HBA-D1-02-DR-A-085102 Rev C01; SEQ-HBA-D1-RF-DR-A-085103 Rev C01; SEQ-HBA-D1-XX-DR-A-085200 Rev C01; SEQ-HBA-D1-XX-DR-A-085201 Rev C01; SEQ-HBA-D1-XX-DR-A-085202 Rev C01; SEQ-HBA-D1-XX-DR-A-085203 Rev C01; SEQ-HBA-D1-XX-DR-A-085300 Rev C01; SEQ-HBA-D1-XX-DR-A-085301 Rev C01; SEQ-HBA-D1-XX-DR-A-085302 Rev C01

SEQ-HBA-D2-00-DR-A-086100 Rev C01; SEQ-HBA-D2-01-DR-A-086101 Rev C01; SEQ-HBA-D2-02-DR-A-086102 Rev C01; SEQ-HBA-D2-RF-DR-A-086103 Rev C01; SEQ-HBA-D2-XX-DR-A-086200 Rev C01; SEQ-HBA-D2-XX-DR-A-086201 Rev C01; SEQ-HBA-D2-XX-DR-A-086202 Rev C01; SEQ-HBA-D2-XX-DR-A-086203 Rev C01; SEQ-HBA-D2-XX-DR-A-086300 Rev C01; SEQ-HBA-D2-XX-DR-A-086301 Rev C01; SEQ-HBA-D2-XX-DR-A-086302 Rev C01;

SEQ-HBA-S2-ZZ-DR-A-084100 Rev C01; SEQ-HBA-S2-XX-DR-A-084200 Rev: C01; SEQ-HBA-S2-XX-DR-A-084300 Rev C01

SEQ-HBA-S3-ZZ-DR-A-087100 Rev C01; SEQ-HBA-S3-XX-DR-A-087200 Rev C01; SEQ-HBA-S3-XX-DR-A-087300 Rev C01

SEQ-HBA-M1-00-DR-A-083100 Rev C01; SEQ-HBA-M1-ZZ-DR-A-083101 Rev C01; SEQ-HBA-M1-ZZ-DR-A-083102 Rev C01; SEQ-HBA-M1-XX-DR-A-083200 Rev C01; SEQ-HBA-M1-XX-DR-A-083201 Rev C01; SEQ-HBA-M1-XX-DR-A-083202 Rev C01; SEQ-HBA-M1-XX-DR-A-083203 Rev C01; SEQ-HBA-M1-XX-DR-A-083300 Rev C01; SEQ-HBA-M1-XX-DR-A-083301 Rev C01

SLC-HBA-SS-ZZ-DR-A-080130 P3; SLC-HBA-SS-ZZ-DR-A-080230 P2; SLC-HBA-SS-ZZ-DR-A-080330 P2; 3295-WSP-XX-XX-DR -C-00100-P03 (Rev P03); 3295-WSP-XX-XX-DR-C-00101-P02 (Rev P02)

Any request for an amendment to an approved plan(s) shall be accompanied by a report confirming that there are no new or different significant environmental impacts to those already assessed or by an appropriate report (or reports) which assesses any new or different significant environmental impacts.

**REASON:-** For the avoidance of doubt and in the interests of proper planning.

### 3 Time Limit (Detailed)

The part of the development for which full planning permission has been granted (as per approved detailed site layout plan ref. SEQ-HBA-SW-ZZ-DR-A-080100 Rev C01) shall be begun within a period of three years of the date of the original planning permission reference 23/00293/FPM.

**REASON:-** To comply with the requirements of Section 92 of the Town and Country Planning Act 1990.

### 4 Phasing Plan Identifying Development Zones (Outline)

Accompanying the submission of reserved matters pursuant to this permission, the applicant shall submit a Plan showing the extent of the Development Zone to which that reserved matter submission relates, within the Outline Area shown on approved parameter plan ref. SEQ-HBA-SW-ZZ-DR-A-080020 Rev C01 to the Local Planning Authority.

**REASON:-** For the avoidance of doubt and in the interests of proper planning.

## 5 **Submission of Reserved Matters (Outline)**

For the individual Development Zones for which outline permission is granted as agreed pursuant to Condition 4 of this permission, no development on each Development Zone (excluding site clearance, demolition, enabling works, earthworks, archaeological investigations, investigations for assessing ground conditions, remedial works in respect of any contamination or other adverse ground conditions, diversion and laying of services within the boundary of the relevant phase and which are not connected to the wider services network, erection of any temporary means of enclosure and the temporary display of site notices or advertisements) shall commence until detailed plans for the relevant Zone have been submitted to and approved in writing by the Local Planning Authority. These plans shall, as applicable, show the layout (including car parking provision, access and servicing arrangements, and waste management), scale (including existing and proposed levels), design, layout and external appearance of the buildings to be constructed and the landscaping to be implemented (hereinafter referred to as "the Reserved Matters") on that Zone. The development of the relevant Development Zone shall only be carried out as approved.

**REASON:-** To comply with the requirements of section 92(4) of the Town and Country Planning Act 1990 and the provisions of the Town and Country Planning (Development Management Procedure) Order 2015 and to ensure that high standards of urban design and a comprehensively planned development are achieved. To ensure construction of a satisfactory development and in the interests of highway safety.

## 6 **Time Limit (Outline)**

All applications for the approval of the Reserved Matters for a Development Zone agreed pursuant to Condition 4 of this permission shall be made to the Local Planning Authority no later than six years from the date of the original planning permission reference 23/00293/FPM. The commencement of a Zone shall be begun not later than the expiration of three years from the date of the last reserved matter of that Zone to be approved.

**REASON:-** To comply with the requirements of section 92(4) of the Town and Country Planning Act 1990.

## 7 **Construction hours of working**

No demolition, construction or maintenance activities audible at the boundary of the relevant phase and no deliveries of construction and demolition materials shall be undertaken outside the hours 07:30 hours to 18:30 hours Mondays to Fridays, 08:30 hours to 13.00 hours on Saturdays and not on a Sunday or Bank Holiday, unless otherwise agreed in writing with the Local Planning Authority.

**REASON:-** To ensure the demolition of the existing buildings and the construction and maintenance of the development does not prejudice the amenities of occupiers of nearby premises due to noise pollution.

## 8 **Construction Management Plan (Detailed)**

No development shall commence on any individual part of the detailed element until a Construction Management Plan (or Construction Method Statement) for that part has been submitted to and approved in writing by the Local Planning Authority. Thereafter the construction of that part of the development shall only be carried out in accordance with the approved Plan. The Construction Management Plan / Statement shall include details of:

- a. Construction vehicle numbers, type, routing;
- b. Access arrangements to the site;
- c. Traffic management requirements
- d. Construction and storage compounds (including areas designated for car parking, loading / unloading and turning areas);
- e. Siting and details of wheel washing facilities;

- f. Cleaning of site entrances, site tracks and the adjacent public highway;
  - g. Timing of construction activities (including delivery times and removal of waste) and to avoid school pick up/drop off times;
  - h. Provision of sufficient on-site parking prior to commencement of construction activities;
  - i. Post construction restoration/reinstatement of the working areas and temporary access to the public highway;
  - j. where works cannot be contained wholly within the site a plan should be submitted showing the site layout on the highway including extent of hoarding, pedestrian routes and remaining road width for vehicle movements.
- REASON:-** In order to protect highway safety and the amenity of other users of the public highway and rights of way in accordance with Policies 5, 12, 17 and 22 of Hertfordshire's Local Transport Plan (adopted 2018).

## 9 **Construction Management Plan - Outline**

No development shall commence on any individual Development Zone as agreed pursuant to Condition 4 of this permission until a Construction Management Plan (or Construction Method Statement) has been submitted to and approved in writing by the Local Planning Authority. Thereafter the construction of the Development Zone shall only be carried out in accordance with the approved Plan. The Construction Management Plan / Statement shall include details of:

- a. Construction vehicle numbers, type, routing;
- b. Access arrangements to the site;
- c. Traffic management requirements
- d. Construction and storage compounds (including areas designated for car parking, loading / unloading and turning areas);
- e. Siting and details of wheel washing facilities;
- f. Cleaning of site entrances, site tracks and the adjacent public highway;
- g. Timing of construction activities (including delivery times and removal of waste) and to avoid school pick up/drop off times;
- h. Provision of sufficient on-site parking prior to commencement of construction activities;
- i. Post construction restoration/reinstatement of the working areas and temporary access to the public highway;
- j. where works cannot be contained wholly within the site a plan should be submitted showing the site layout on the highway including extent of hoarding, pedestrian routes and remaining road width for vehicle movements.

**REASON:-** In order to protect highway safety and the amenity of other users of the public highway and rights of way in accordance with Policies 5, 12, 17 and 22 of Hertfordshire's Local Transport Plan (adopted 2018).

## 10 **Site Waste Management Plan (Detailed)**

No development shall commence on any individual part of the detailed element until a Site Waste Management Plan (SWMP) for that part has been submitted to the Local Planning Authority and approved in consultation with the Waste Planning Authority. The SWMP should aim to reduce the amount of waste produced on that part of the site and should contain information including estimated types and quantities of waste to arise from construction and waste management actions for each waste type. The development of that part of the site shall be carried out in accordance with the approved SWMP.

**REASON:-** To promote the sustainable management of waste arisings and contribution towards resource efficiency, in accordance with Policy 12 of the Hertfordshire Waste Core Strategy and Development Management Policies Development Plan Document (2012).

11 **Site Waste Management Plan (Outline)**

No development shall commence on any individual Development Zone as agreed pursuant to Condition 4 of this permission until a Site Waste Management Plan (SWMP) has been submitted to the Local Planning Authority and approved in consultation with the Waste Planning Authority. The SWMP should aim to reduce the amount of waste produced on site and should contain information including estimated types and quantities of waste to arise from construction and waste management actions for each waste type. The development shall be carried out in accordance with the approved SWMP.

**REASON:-** To promote the sustainable management of waste arisings and contribution towards resource efficiency, in accordance with Policy 12 of the Hertfordshire Waste Core Strategy and Development Management Policies Development Plan Document (2012).

12 **Highway Improvements – Offsite (Implementation / Construction)**

Prior to the first occupation of buildings 2 and 4, commencement of 'substantial works', including, but not limited to: vegetation removal; setting up of traffic management; commencement of removal of existing curb lines; clearance of existing walls and fences; service diversions and drainage of the offsite highway improvement works as shown in S278 General Arrangement Drawings 3295-WSP-XX-XX-DR -C-00100-P03 (Rev P03) and 3295-WSP-XX-XX-DR -C-00101-P02 (Rev P02) shall be completed in accordance with the approved details. No other buildings shall be occupied until all works included within the aforementioned drawings are complete.

**REASON:-** To ensure construction of a satisfactory development and that the highway improvement works are designed to an appropriate standard in the interest of highway safety and amenity and in accordance with Policy 5, 13 and 21 of Hertfordshire's Local Transport Plan (adopted 2018).

13 **Completion of Arrival Plaza**

Prior to the first occupation of the development hereby permitted the arrival plaza area shall be completed in accordance with the approved drawings ref. SEQ-HBA-SW-ZZ-DR-A-080100 Rev C01, 25021-EXA-ZZ-GF-DR-L-00118 Rev P01 and 25021-EXA-ZZ-GF-DR-L-00101 Rev P01.

**REASON:-** To ensure that sustainable transport measures are in place at the earliest opportunity for all employees and visitors.

**Shuttle Bus Service**

14 Prior to first occupation of the development hereby permitted a Shuttle Bus Service Operation Plan shall be submitted to and approved by the Local Planning Authority. The Plan shall provide details of an enhanced shuttle bus service (either quantitative and / or qualitative improvement over the existing position) suitable to meet the requirements of the existing and proposed floorspace at the application site and wider campus. The Plan shall then be updated and the service adapted as may be required to meet the ongoing requirements of additional floorspace as it is delivered in each Development Zone in line with the overall objectives of the Framework and Detailed Travel Plan(s).

**REASON:-** To ensure that the development offers a wide range of travel choices to reduce the impact of travel and transport on the environment.

**On Site Bus Priority**

15 Prior to first occupation of the development hereby permitted bus priority measures as described in the Transport Assessment (Paragraph 5.52) will be complete.

**REASON:-** To ensure that sustainable travel options associated with the development are promoted and maximised to be in accordance with Policies 3, 5, 7, 8, 9 and 10 of Hertfordshire's Local Transport Plan 2018.

### **Traffic, Travel Mode Split and Parking Monitoring**

- 17 Prior to first occupation of the development hereby permitted, a monitoring programme to assess the level of traffic generation, travel mode split of all employees and parking accumulation at defined intervals of occupancy shall be submitted to and approved in writing by the Local Planning Authority. The monitoring programme shall be implemented as agreed unless the Local Planning Authority gives written approval to any variation.
- REASON:-** To ensure that agreed traffic levels are not breached and thus the highway network is adequate to cater for the development proposed.

### **Underpass Improvements**

- 18 The measures to improve the Gunnels Wood Road/A602 underpass as set out within the WSP Underpass Technical Note ref. 3295-WSP-XX-XX-TN-C-01100 P04 to make it, as far as reasonably practical, Department for Transport 'Cycle Infrastructure Design' Local Transport Note guidance, July 2020 (LTN 1/20) compliant shall be implemented and permanently maintained in accordance with the approved details.
- REASON:-** To ensure that sustainable travel options associated with the development are promoted and maximised to be in accordance with Policies 3, 5, 7, 8, 9 and 10 of Hertfordshire's Local Transport Plan (adopted 2018).

### **External materials (Detailed)**

- 19 The development to which this permission relates shall be carried out in accordance with the external materials specified within drawings SEQ-HBA-B2-XX-DR-A-081200 Rev C01; SEQ-HBA-B2-XX-DR-A-081201 Rev C01; SEQ-HBA-B2-XX-DR-A-081202 Rev C01; SEQ-HBA-B2-XX-DR-A-081203 Rev C01; SEQ-HBA-B4-XX-DR-A-082200 Rev C01; SEQ-HBA-B4-XX-DR-A-082201 Rev C01; SEQ-HBA-B4-XX-DR-A-082202 Rev C01; SEQ-HBA-B4-XX-DR-A-082203 Rev C01; SEQ-HBA-D1-XX-DR-A-085200 Rev C01; SEQ-HBA-D1-XX-DR-A-085201 Rev C01; SEQ-HBA-D1-XX-DR-A-085202 Rev C01; SEQ-HBA-D1-XX-DR-A-085203 Rev C01; SEQ-HBA-D2-XX-DR-A-086200 Rev C01; SEQ-HBA-D2-XX-DR-A-086201 Rev C01; SEQ-HBA-D2-XX-DR-A-086202 Rev C01; SEQ-HBA-D2-XX-DR-A-086203 Rev C01; SEQ-HBA-M1-XX-DR-A-083200 Rev C01; SEQ-HBA-M1-XX-DR-A-083201 Rev C01; SEQ-HBA-M1-XX-DR-A-083202 Rev C01; SEQ-HBA-M1-XX-DR-A-083203 Rev C01; SEQ-HBA-S2-XX-DR-A-084200 Rev C01; SEQ-HBA-S3-XX-DR-A-087200 Rev C01; SLC-HBA-SS-ZZ-DR-A-080230 P2 as approved or any alternatives to be submitted to and approved by the Local Planning Authority.

**REASON:-** To ensure a satisfactory appearance for the development.

### **Masterplan Design Code (Outline)**

- 20 For each individual Development Zone for which outline permission is granted as agreed pursuant to Condition 4 of this permission, the submission of reserved matters relating to the design and external appearance of the building(s) shall be in accordance with the approved Masterplan Design Code by Hawkins Brown SEQ-HBA-XX-XX-RP-A-080002 C01 (December 2025) or an alternative Design Code submitted to and approved by the Local Planning Authority.
- REASON:-** To ensure a satisfactory appearance for the development.

### **Landscape Design Code (Outline)**

- 21 For each individual Development Zone for which outline permission is granted as agreed pursuant to Condition 4 of this permission, the submission of reserved matters in relation to the landscaping strategy shall be in accordance with the approved Landscape Design Code (December 2025) by Hawkins Brown and Exterior Architecture or an alternative Design Code submitted to and approved by the Local Planning Authority.  
**REASON:-** To ensure a satisfactory appearance for the development.

### **Tree Strategy (Outline)**

- 22 For each individual Development Zone for which outline permission is granted as agreed pursuant to Condition 4 of this permission, the submission of reserved matters in relation to tree planting shall be in accordance with the approved Landscape Masterplan – Section 7: Tree Strategy (December 2025) or an alternative Strategy submitted to and approved by the Local Planning Authority.  
**REASON:-** To ensure a satisfactory appearance for the development.

### **Landscaping Scheme (Detailed)**

- 23 All hard and soft landscaping shall be carried out in accordance with the approved details as set out in detailed landscape general arrangement plans ref: 25021-EXA-ZZ-GF-DR-L-00101 Rev P01; 25021-EXA-ZZ-GF-DR-L-00110 Rev P01; 25021-EXA-ZZ-GF-DR-L-00111 Rev P01; 25021-EXA-ZZ-GF-DR-L-00112 Rev P01; 25021-EXA-ZZ-GF-DR-L-00113 Rev P01; 25021-EXA-ZZ-GF-DR-L-00114 Rev P01; 25021-EXA-ZZ-GF-DR-L-00115 Rev P01; 25021-EXA-ZZ-GF-DR-L-00116 Rev P01; 25021-EXA-ZZ-GF-DR-L-00117 Rev P01; 25021-EXA-ZZ-GF-DR-L-00118 Rev P01; 25021-EXA-ZZ-GF-DR-L-00119 Rev P01; 25021-EXA-ZZ-GF-DR-L-00120 Rev P01; 25021-EXA-ZZ-GF-DR-L-00121 Rev P01 to a reasonable standard in accordance with the relevant British Standards or other recognised Codes of Good Practice.  
**REASON:-** To ensure a satisfactory appearance for the development.

### **Planting / Seeding / Turfing (Detailed)**

- 24 All planting, seeding or turfing comprised in the approved details of landscaping shall be carried out in the first planting and seeding seasons following the completion of Buildings in the Detailed Area unless where identified as meanwhile landscaping subject to Condition 46.  
**REASON:-** To ensure a satisfactory appearance for the development.

### **Hard Surfacing (Detailed)**

- 25 All hard surfacing comprised in the approved details of landscaping shall be carried out within 6 months of the completion of Buildings in the Detailed Area, or, where hard surfacing is associated with individual buildings, prior to first occupation of each building (except substations) hereby permitted, whichever is the earliest unless where identified as meanwhile landscaping subject to Condition 46.  
**REASON:-** To ensure a satisfactory appearance for the development.

### **Replacement Trees (Detailed)**

- 26 Any trees or plants comprised within the scheme of landscaping, which within a period of five years from the completion of the development die, are removed or become seriously damaged or diseased shall be replaced in the next planting season with others of similar size and species, unless otherwise agreed in writing by the Local Planning Authority.  
**REASON:-** To ensure a satisfactory appearance for the development.

### **Retention / Topping / Lopping of Trees (Detailed)**

- 27 No tree shown on the approved landscaping scheme, shall be cut down, uprooted or destroyed, nor shall any retained tree be topped or lopped within five years of the completion of development without the written approval of the Local Planning Authority.  
**REASON:-** To ensure the protection of those trees which should be retained in the interests of visual amenity.

### **Installation of Tree Protection Measures**

- 28 Before any development commences, including any site clearance or demolition works, any trees on the site to be retained shall be protected by fencing or other means of enclosure. Such protection shall be maintained until the conclusion of all site and building operations.  
**REASON:-** To ensure that the retained tree(s) are not damaged or otherwise adversely affected during site operations.

### **Tree Protection / Ground Levels**

- 29 Within the areas to be fenced off in accordance with condition 28; there shall be no alteration to the ground level and they shall be kept clear of vehicles, materials, surplus soil, temporary buildings, plant and machinery.  
**REASON:-** To ensure that the retained tree(s) is not damaged or otherwise adversely affected during site operations.

### **Bird Nesting Season / Clearance**

- 30 All areas of hedges, scrub or similar vegetation where birds may nest which are to be removed as part of the development of a phase, are to be cleared outside the bird-nesting season (March – August inclusive) or if clearance during the bird-nesting season cannot reasonably be avoided, a suitably qualified ecologist will check the areas to be removed within the relevant phase immediately prior to clearance and advise whether nesting birds are present. If active nests are recorded within the relevant phase, no vegetation clearance or other works that may disturb active nests shall proceed within that phase until all young have fledged the nest.  
**REASON:-** Nesting birds are protected from disturbance under the Wildlife and Countryside Act 1981 (As amended).

### **Biodiversity Net Gain Management Plan**

- 31 No building within any individual part of the detailed element shall be occupied until a biodiversity net gain management plan (BNGMP) for that part has been submitted to, and approved in writing by, the Local Planning Authority. Thereafter a BNGMP shall be submitted alongside each application for reserved matters within individual Development Zones.

The content of the BNGMPs shall demonstrate how each individual part / phase of the development can contribute to the overall delivery of a minimum increase in habitat units across the entire site of 54.99 area habitat units and 0.77 linear units to achieve a net gain in biodiversity and include the following:

- a) Description and evaluation of habitat parcels to be managed, cross referenced to individual lines in the metric.
- b) Maps of all habitat parcels, cross referenced to corresponding lines in the metric.
- c) Appropriate management options for achieving target condition for habitats as described in the approved metric.
- d) Preparation of an annual work schedule for each habitat parcel (including a 30-year work plan capable of being rolled forward in perpetuity).

- e) Details of the body or organisation responsible for implementation of the plan.
- f) Details of species selected to achieve target habitat conditions as identified in approved metric, definitively stated and marked on plans.
- g) Ongoing monitoring plan and remedial measures to ensure habitat condition targets are met.
- h) Reporting plan and schedule for informing LPA of condition of habitat parcels for 30 years.

The BNGMP shall also include details of the legal and funding mechanism(s) by which the long-term implementation of the plan will be secured by the developer with the management body(ies) responsible for its delivery. The plan shall also set out (where the results from monitoring show that conservation aims and objectives of the BNGMP are not being met) how contingencies and/or remedial action will be identified, agreed and implemented so that the development still delivers the fully functioning biodiversity objectives of the originally approved scheme.

**REASON:-** To deliver biodiversity net gain in accordance with NPPF.

#### **Swift Box / Tower Details (Detailed)**

- 33 No building shall be occupied until details of swift boxes and/or bricks and/or a swift tower (model and location) have been submitted and approved by the Local Planning Authority. These devices shall be fully installed prior to occupation and retained as such thereafter.  
**REASON:-** To contribute to biodiversity net gain in accordance with NPPF.

#### **Swift Box / Tower Details (Outline)**

- 34 No building shall be occupied within any individual Development Zone, until details of integrated swift boxes and/or bricks and/or a swift tower (model and location) shall be submitted to and approved by the Local Planning Authority. This shall demonstrate that, with the provision required under Condition 33, a total of 40 swift boxes (or equivalent as provided within a tower) are provided across the site. These devices shall be fully installed prior to occupation and retained as such thereafter.  
**REASON:-** To contribute to biodiversity net gain in accordance with NPPF.

#### **Retail Floorspace Limit**

- 35 No more than 500m<sup>2</sup> of Class E(a) retail floorspace shall be provided across the whole of the application site.  
**REASON:-** To ensure the proposal complies with Local Plan employment policies SP3 and EC1.

#### **Ground Conditions - Quantitative Risk Assessment**

- 36 Prior to commencement of development a generic quantitative risk assessment (GQRA) shall be conducted as part of a ground investigation to inform the future engineering design.  
**REASON:-** To prevent harm to human health and pollution of the water environment.

#### **Unidentified Contamination / Remediation Scheme / Verification**

- 37 If during a particular phase of development contamination that has not been previously identified is found, it must be reported in writing immediately to the Local Planning Authority. An investigation and risk assessment must be undertaken and where remediation is necessary a remediation scheme must be submitted to and approved in writing by the Local Planning Authority. Following completion of measures identified in the approved remediation scheme, a verification report must be submitted to and approved in writing by the Local Planning Authority.  
**REASON:-** To safeguard human health and ground water.

### **Implementation of Climate Change Mitigation / BREEAM Excellent (Detailed)**

- 38 The measures to address adaptation to climate change as set out within the Design and Access Statement (December 2025) by Hawkins Brown, Sustainability Strategy (December 2025) and Energy Statement (December 2025) by KJ Tait Engineers shall achieve minimum BREEAM Excellent and be implemented in relation to Buildings 2 and 4, and Data Centres, and permanently maintained in accordance with the approved details.  
**REASON:-** To ensure the development is adaptable to climate change through provision of energy and water efficiency measures.

### **Climate Change Mitigation / Energy and Sustainability Statement (Outline)**

- 39 Each application for the Reserved Matters submitted pursuant to condition 5 of this Permission shall include an Energy and Sustainability Statement detailing requirements of how the building(s) in each Development Zone are adaptable to climate change (detailing renewable energy technologies as well detailing measures to control overheating and cooling demand in the building(s)). The details shall also include a management plan and maintenance strategy/schedule for the operation of the technologies, a servicing plan (if applicable) and a noise assessment (if applicable). The measures for adaptation to climate change as well as managing overheating and cooling shall be implemented in accordance with the details approved pursuant to condition 5 of this Permission.  
**REASON:-** To ensure the development is adaptable to climate change and to avoid overheating and minimising cooling demand.

### **Noise Limits**

- 40 Before any item of plant or machinery is used in connection with the data centres hereby approved, it shall be installed and operated in accordance with a written scheme first agreed in writing with the Local Planning Authority. The scheme shall set out measures both technical and managerial that will limit the acoustic impact of the plant and/or machinery so that its Rating Level does not exceed those values set out in Planning Noise Report authored by Sandy Brown Ltd. (reference 23023-R06-B, Version B, dated 15/12/2025 and addendum note reference M011-A, dated 27/2/2026) as assessed within the curtilage of any dwelling or other noise sensitive receptor having regard to the definitions and assessment approach set out in British Standard BS4142: 2014 + A1: 2019.  
**REASON:-** To safeguard the amenity of the surrounding area.

### **Implementation of Ecological Enhancements**

- 41 The recommended ecological and nature conservation enhancements set out within the Ecological Impact Assessment by SLR dated April 2023 in respect of the Detailed Area and each Development Zone as agreed pursuant to condition 4 shall be implemented and permanently maintained in accordance with the approved details.  
**REASON:-** To provide a net gain in biodiversity.

### **External Lighting**

- 42 The development to which this permission relates in respect of the Detailed Area and each Development Zone as agreed pursuant to condition 4, shall be carried out in accordance with the recommendations set out within the Exterior Lighting Strategy by FPOV (ref: J4431-SL-5101-03, January 2026) as approved or any alternatives to be submitted to and approved by the Local Planning Authority.  
**REASON:-** To safeguard wildlife and the amenity of the surrounding area.

## **Water Supply and Fire Hydrants**

- 43 No individual building within the Detailed Area, and each respective Development Zone as agreed pursuant to condition 4, shall be occupied until a scheme for the provision of adequate water supplies and fire hydrants, necessary for firefighting purposes for that building within each area / zone, has been submitted to and approved in writing by the Local Planning Authority. The relevant building within the Detailed Area / Development Zone shall not be occupied until the scheme has been implemented in accordance with the approved details.

**REASON:-** To ensure adequate water infrastructure provision is made on site for the local fire service to discharge its statutory firefighting duties

## **EV Charging**

- 44 Prior to the first use of MSCP1, details of the location of an equivalent 20% of new car parking spaces within the detailed phase to have active EV charging shall be submitted to the LPA. 80% of remaining spaces are to have passive provision for EV charging.

Prior to first use of each respective MSCP within a Development Zone as agreed pursuant to condition 4, provision shall be made for 20% of the car parking spaces to have active provision for EV charging and 80% of the remaining car parking spaces to have passive provision for EV charging.

**REASON:-** To ensure construction of a satisfactory development and to promote sustainable development in accordance with Policies 5, 19 and 20 of Hertfordshire's Local Transport Plan (adopted 2018).

## **Archaeological Works (GSK Extensions – outline)**

- 45 No development shall take place within the southern half of the site (i.e. the Zone A and Zone B Extensions to the existing GSK building identified on drawing ref: SEQ-HBA-SW-ZZ-DR-A-080020 Rev C01) until the applicant, or their agents or successors in title, has secured the implementation of a programme of archaeological work for those parcels in accordance with a written scheme of investigation which has been submitted to and approved in writing by the Local Planning Authority.

**REASON:-** To ensure the investigation and recording of any items of archaeological interest.

## **Meanwhile Uses / Landscaping**

- 46 The provision of meanwhile uses / landscaping shall be in accordance with drawing ref: SEQ-HBA-SW-ZZ-DR-A-080020 Rev C01 and Landscape Masterplan - Section 10: Meanwhile Landscape (December 2025) or in accordance with alternative details as submitted to and approved by the Local Planning Authority.

**REASON:-** To ensure a satisfactory appearance for the development.

## **Substation Equipment / Housings**

- 47 Details of the substation equipment / housings shall be in accordance with drawing refs: SLC-HBA-SS-ZZ-DR-A-080130 Rev P3, SLC-HBA-SS-ZZ-DR-A-080230 Rev P2, SLC-HBA-SS-ZZ-DR-A-080330 Rev P2, SEQ-HBA-S2-ZZ-DR-A-084100 Rev C01, SEQ-HBA-S2-XX-DR-A-084200 Rev C01, SEQ-HBA-S2-XX-DR-A-084300 Rev C01, or alternative details as submitted to and approved by the Local Planning Authority.

**REASON:-** To ensure a satisfactory appearance for the development.

## Surface Water Infiltration

- 48 No drainage systems for the infiltration of surface water to the ground are permitted other than with the written consent of the Local Planning Authority. Any proposals for such systems must be supported by an assessment of the risks to controlled waters. The development shall be carried out in accordance with the approved details.

**REASON:-** To ensure that the development does not contribute to, is not put at unacceptable risk from, or adversely affected by, unacceptable levels of water pollution caused by mobilised contaminants. This is in line with paragraph 174 of the National Planning Policy Framework.

## Detailed Drainage Strategy – Each Detailed / Outline Phase

- 49 No development shall commence on any individual part of the detailed element or any individual Development Zone as agreed pursuant to Condition 4 of this permission until a drainage strategy for that part / phase is submitted to the Local Planning Authority. This should include:

i. Detailed infiltration testing (in each relevant catchment of the detailed phase and each relevant catchment of each outline phase in accordance with BRE Digest 365 (or equivalent) at the location of each infiltration feature, at the proposed depth and along the length of any large infiltration features.

ii. Evidence to demonstrate that, the overall total site wide discharge for the entire developed site will not exceed 1.64l/s/ha (QBAR).

iii. Provision of surface water attenuation storage, sized and designed to accommodate the volume of water generated in all rainfall events up to and including the critical storm duration for the 3.33% AEP (1 in 30 year) and 1% AEP (1 in 100) rainfall events (both including allowances for climate change).

iv. Detailed designs, modelling calculations (using FEH13 or FEH22) and labelled drawings of the drainage conveyance network in the:

- 3.33% AEP (1 in 30 year) critical rainfall event plus climate change to show no flooding outside the drainage features on any part of the site.

- 1% AEP (1 in 100 year) critical rainfall plus climate change event to show, if any, the depth, volume and storage location of any flooding outside the drainage features, ensuring that flooding does not occur in any part of a building or any utility plant susceptible to water (e.g. pumping station or electricity substation) within the development. It will also show that no runoff during this event will leave the site uncontrolled.

**REASON:-** To ensure the flood risk is adequately addressed, not increased and users remain safe for the lifetime of the development in accordance with the NPPF and Stevenage Local Plan (2019).

## Method Statement - Interim / Temporary Drainage Measures

- 50 No development shall commence on any individual part of the detailed element or any individual Development Zone as agreed pursuant to Condition 4 of this permission until details and a method statement for interim and temporary drainage measures during the demolition and construction of that part / phase have been submitted to and approved in writing by the Local Planning Authority. This information shall provide full details of who will be responsible for maintaining such temporary systems and demonstrate how the site will be drained to ensure there is no increase in the off-site flows, nor any pollution, debris and sediment to any receiving watercourse or sewer system. The site works and construction phase for that part / phase shall thereafter be carried out in accordance with approved method statement, unless alternative measures have been subsequently approved by the Planning Authority.

**REASON:-** To prevent flooding and pollution offsite in accordance with the NPPF.

## **Drainage Construction Drawings / Method Statement**

- 51 No development shall commence on the drainage scheme within any individual part of the detailed element or within any individual Development Zone as agreed pursuant to Condition 4 of this permission until construction drawings of the surface water drainage network, associated sustainable drainage components and flow control mechanisms and a construction method statement for that part / phase are submitted to and agreed in writing by the Local Planning Authority. The scheme shall then be constructed as per the agreed drawings for that part / phase, method statement and Drainage Strategy as submitted for Condition 49 and remaining in perpetuity for the lifetime of the development unless agreed in writing by the Local Planning Authority. No alteration to the agreed drainage scheme shall occur without prior written approval from the Local Authority.
- REASON:-** To ensure that the development achieves a high standard of sustainability and to comply with the NPPF and Stevenage Local Plan (2019).

## **Drainage Maintenance and Management Details**

- 52 No building within the detailed part of the application or any individual Development Zone as agreed pursuant to Condition 4 of this permission hereby approved shall be occupied until details of the maintenance and management of the sustainable drainage scheme associated with that building or phase have been submitted to and approved in writing by the Local Planning Authority. The drainage scheme shall be implemented prior to the first occupation of any building within that phase and thereafter managed and maintained in accordance with the approved details in perpetuity. The Local Planning Authority shall be granted access to inspect the sustainable drainage scheme for the lifetime of the development. The details of the scheme to be submitted for approval shall include:
1. A timetable for its implementation.
  2. Details of SuDS feature and connecting drainage structures and maintenance requirement for each aspect including a drawing showing where they are located.
  3. A management and maintenance plan for the lifetime of the development which shall include the arrangements for adoption by any public body or statutory undertaker, or any other arrangements to secure the operation of the sustainable drainage scheme throughout its lifetime. This will include the name and contact details of any appointed management company.
- REASON:-** To ensure that the development achieves a high standard of sustainability and ensure the flood risk is adequately addressed for each new dwelling and not increased in accordance with the NPPF and Stevenage Local Plan (2019).

## **Drainage Survey / Verification Report**

- 53 Upon completion of each phase of the development's surface water drainage system, including any SuDS features, and prior to first occupation of any building within each phase; a survey and verification report from an independent surveyor shall be submitted to and approved in writing by the Local Planning Authority. The survey and report shall demonstrate that the surface water drainage system for that phase has been constructed in accordance with the details approved pursuant to Condition 49. Where necessary, details of corrective works to be carried out along with a timetable for their completion, shall be included for approval in writing by the Local Planning Authority. Any corrective works required shall be carried out in accordance with the approved timetable and subsequently resurveyed with the findings submitted to and approved in writing by the Local Planning Authority.
- REASON:-** To ensure the flood risk is adequately addressed, not increased and users remain safe for the lifetime of the development in accordance with the NPPF and Stevenage Local Plan (2019).

## Generators and Life Safety

- 54 Testing of any back-up power, life safety and standby power generators shall only be undertaken in accordance with the scenarios set out in paragraph 3.1.2 of the Air Quality Assessment dated December 2025 or any alternatives to be submitted and approved by the Local Planning Authority. Testing of back-up generators shall only be undertaken between the hours of 07:00-23:00. Generators shall otherwise only be used in emergency situations. Data Centre back-up power generators shall incorporate Selective Catalytic Reduction.
- REASON:-** To safeguard the amenity of the surrounding area.

## INFORMATIVES

1. Stevenage Borough Council adopted a Community Infrastructure Levy (CIL) Charging Schedule at Full Council on 27 January 2020 and started implementing CIL on 01 April 2020.

This application may be liable for CIL payments and you are advised to contact the CIL Team for clarification with regard to this. If your development is CIL liable, even if you are granted an exemption from the levy, please be advised that it is a requirement under Regulation 67 of The Community Infrastructure Levy Regulations 2010 (as amended) that CIL Form 6 (Commencement Notice) must be completed, returned and acknowledged by Stevenage Borough Council before building works start. Failure to do so will mean you risk losing the right to payment by instalments and a surcharge will be imposed. NB, please note that a Commencement Notice is not required for residential extensions if relief has been granted.

Stevenage's adopted CIL Charging Schedule and further details of CIL can be found on the Council's webpages at [www.stevenage.gov.uk/CIL](http://www.stevenage.gov.uk/CIL) or by contacting the Council's CIL Team at [CIL@Stevenage.gov.uk](mailto:CIL@Stevenage.gov.uk).

The applicant is advised that the storage of materials associated with the construction of this development should be provided within the site on land which is not public highway, and the use of such areas must not interfere with the public highway. If this is not possible, authorisation should be sought from the Highway Authority before construction works commence. Further information is available via the County Council website at:

<https://www.hertfordshire.gov.uk/services/highways-roads-and-pavements/business-and-developer-information/business-licences/business-licences.aspx>

or by telephoning 0300 1234047.

2. The applicant is advised that in order to comply with this permission it will be necessary for the developer of the site to enter into an agreement with Hertfordshire County Council as Highway Authority under Section 278 of the Highways Act 1980 to ensure the satisfactory completion of the access and associated road improvements. The construction of such works must be undertaken to the satisfaction and specification of the Highway Authority, and by a contractor who is authorised to work in the public highway. Before works commence the applicant will need to apply to the Highway Authority to obtain their permission and requirements. Further information is available via the website <https://www.hertfordshire.gov.uk/services/highways-roads-and-pavements/businessanddeveloper-information/development-management/highways-developmentmanagement.aspx> or by telephoning 0300 1234047.
3. Extent of Highway: Information on obtaining the extent of public highway around the site can be obtained from the HCC website:

[www.hertfordshire.gov.uk/services/highways-roads-and-pavements/changes-to-your-road/extent-of-highways.aspx](http://www.hertfordshire.gov.uk/services/highways-roads-and-pavements/changes-to-your-road/extent-of-highways.aspx)

4. Parking and Storage of materials: The applicant is advised that all areas for parking, storage, and delivery of materials associated with the construction of this development should be provided within the site on land which is not public highway, and the use of such areas must not interfere with the public highway. If this is not possible, authorisation should be sought from the Highway Authority before construction works commence. Further information is available via the website:  
<https://www.hertfordshire.gov.uk/services/highways-roads-and-pavements/business-and-developer-information/development-management/highways-development-management.aspx> or by telephoning 0300 1234047.
5. Obstruction of public highway land: It is an offence under section 137 of the Highways Act 1980 for any person, without lawful authority or excuse, in any way to wilfully obstruct the free passage along a highway or public right of way. If this development is likely to result in the public highway or public right of way network becoming routinely blocked (fully or partly) the applicant must contact the Highway Authority to obtain their permission and requirements before construction works commence. Further information is available via the website:  
<http://www.hertfordshire.gov.uk/services/transtreets/highways/> or by telephoning 0300 1234047.
6. Debris and deposits on the highway: It is an offence under section 148 of the Highways Act 1980 to deposit compost, dung or other material for dressing land, or any rubbish on a made up carriageway, or any or other debris on a highway to the interruption of any highway user. Section 149 of the same Act gives the Highway Authority powers to remove such material at the expense of the party responsible. Therefore, best practical means shall be taken at all times to ensure that all vehicles leaving the site during construction of the development and use thereafter are in a condition such as not to emit dust or deposit mud, slurry or other debris on the highway. Further information is available by telephoning 0300 1234047.
7. Avoidance of surface water discharge onto the highway: The applicant is advised that the Highway Authority has powers under section 163 of the Highways Act 1980, to take appropriate steps where deemed necessary (serving notice to the occupier of premises adjoining a highway) to prevent water from the roof or other part of the premises falling upon persons using the highway, or to prevent so far as is reasonably practicable, surface water from the premises flowing on to, or over the footway of the highway.
8. Roads to remain private: The applicant is advised that all new roads associated with this development will remain unadopted (and shall not be maintained at public expense by the Highway Authority). At the entrance of the new estate the road name plate should indicate that it is a private road and the developer should put in place permanent arrangements for long-term maintenance.
9. Adoption (section 38): The applicant is advised that Hertfordshire County Council as Highway Authority will likely adopt the pedestrian and cycle routes through the development to ensure their long-term continuity, however the developer should put in place permanent arrangements for long-term maintenance. Details of the specification, layout and alignment, width and levels of the said highways, together with all the necessary highway and drainage arrangements, including run off calculations must be submitted to the Highway Authority. No development shall commence until the details have been approved in writing and an Agreement made under Section 38 of the Highways Act 1980 is in place. Furthermore, the extent of adoption as public highway, once finalised, must be clearly illustrated on a plan. Further information is available via the County Council's website at:

<https://www.hertfordshire.gov.uk/services/highways-roads-and-pavements/business-and-developer-information/development-management/highways-development-management.aspx> or by telephoning 0300 1234047.

10. Construction Management Plan (CMP): The purpose of the CMP is to help developers minimise construction impacts and relates to all construction activity both on and off site that impacts on the wider environment. It is intended to be a live document whereby different stages will be completed and submitted for application as the development progresses. A completed and signed CMP must address the way in which any impacts associated with the proposed works, and any cumulative impacts of other nearby construction sites will be mitigated and managed. The level of detail required in a CMP will depend on the scale and nature of development. The CMP would need to include elements of the Construction Logistics and Community Safety (CLOCS) standards as set out in our Construction Management template, a copy of which is available on the County Council's website at:  
<https://www.hertfordshire.gov.uk/services/highways-roads-and-pavements/business-and-developer-information/development-management/highways-development-management.aspx>
11. Abnormal loads and importation of construction equipment (i.e. large loads with: a width greater than 2.9m; rigid length of more than 18.65m or weight of 44,000kg - commonly applicable to cranes, piling machines etc.): The applicant is directed to ensure that operators conform to the provisions of The Road Vehicles (Authorisation of Special Types) (General) Order 2003 in ensuring that the Highway Authority is provided with notice of such movements, and that appropriate indemnity is offered to the Highway Authority. Further information is available via the Government website [www.gov.uk/government/publications/abnormal-load-movements-application-and-notification-forms](http://www.gov.uk/government/publications/abnormal-load-movements-application-and-notification-forms) or by telephoning 0300 1234047.
12. Travel Plan (TP): A TP, in accordance with the provisions as laid out in Hertfordshire County Council's Travel Plan Guidance, would be required to be in place from the first occupation/use until 5 years post occupation/use. A £1,200 per annum (overall sum of £6000 and index-linked RPI March 2014) Evaluation and Support Fee would need to be secured via a Section 106 agreement towards supporting the implementation, processing and monitoring of the full travel plan including any engagement that may be needed. Further information is available via the County Council's website at:  
<https://www.hertfordshire.gov.uk/services/highways-roads-and-pavements/business-and-developer-information/development-management/highways-development-management.aspx> OR by emailing [travelplans@hertfordshire.gov.uk](mailto:travelplans@hertfordshire.gov.uk).
13. During the demolition and construction phase of the development, the guidance in BS5228-1:2009 (Code of Practice for Noise Control on Construction and Open Sites) should be adhered to.
14. The applicant is advised to contact the Hertfordshire Constabulary CPDS with a view to seeking to achieve accreditation to the Police preferred minimum security standard that is Secured by Design to ensure that the development is compliant with both National and Local Planning Policies. In addition, this will also demonstrate the discharge of obligations under Approved Document 'Q' – Security of Building Regulations".
15. A Groundwater Risk Management Permit from Thames Water will be required for discharging groundwater into a public sewer. Any discharge made without a permit is deemed illegal and may result in prosecution under the provisions of the Water Industry Act 1991. We would expect the developer to demonstrate what measures he will undertake to minimise groundwater discharges into the public sewer. Permit enquiries should be directed to Thames Water's Risk Management Team by telephoning 020 3577 9483 or by emailing [trade.effluent@thameswater.co.uk](mailto:trade.effluent@thameswater.co.uk). Application forms should be completed online via

www.thameswater.co.uk. Please refer to the Wholesale; Business customers; Groundwater discharges section.

16. For water supply, infrastructure protection and mains diversions please get in contact with the Affinity Water Developer Services Team via the "My Developments Portal" <https://ainitywater.custhelp.com> or [aw\\_developerservices@custhelp.com](mailto:aw_developerservices@custhelp.com).
17. The applicant is advised of the Council's powers under Part III of the Environmental Protection Act 1990 to prohibit nuisances associated with noise, odour, dust, artificial light and a range of other pollutants that may arise from both demolition/construction sites and ongoing commercial/industrial land uses.
18. The applicant is advised of the Council's powers under the Control of Pollution Act 1974 to restrict noise generating construction (including demolition) activity audible beyond the development site boundary.
19. The applicant is advised that in relation to the data centres, the design criteria to which condition 40 relates are as follows:
  - Cumulative noise associated with building services plant (excluding back-up generators and life safety systems) serving the data centres should not exceed LAr,Tr 48 dB during the day (07:00-23:00) and LAr,Tr 40 dB at night (23:00-07:00) at the residential dwellings to the east, and a level of LAr,Tr 59 dB during the day (07:00-23:00) and LAr,Tr 51 dB at night (23:00-07:00) at the hotel to the west.
  - Cumulative noise associated with the data centres whilst the backup generators are operational should not exceed LAr,Tr 54 dB during the day (07:00-23:00) and LAr,Tr 46 dB at night (23:00-07:00) at the residential dwellings to the east, and a level of LAr,Tr 65 dB during the day (07:00-23:00) and LAr,Tr 57 dB at night (23:00-07:00) at the hotel to the west.

## **PRO-ACTIVE STATEMENT**

Planning permission has been granted for this proposal. The Council acted pro-actively through positive engagement with the applicant at the pre-application stage and during the determination process which led to improvements to the scheme. The Council has therefore acted pro-actively in line with the requirements of the National Planning Policy Framework (paragraph 38) and in accordance with the Town and Country Planning (Development Management Procedure) (England) Order 2015.

## 11. BACKGROUND DOCUMENTS

1. The application file, forms, plans and supporting documents having the reference number relating to this item. Online copies may be obtained at <https://publicaccess.stevenage.gov.uk/online-applications/>
2. The Stevenage Borough Local Plan 2011-2031  
<https://www.stevenage.gov.uk/planning-and-building-control/planning-policy/local-plan>
3. The Stevenage Borough Local Plan Partial Update 2025  
<https://www.stevenage.gov.uk/planning-and-building-control/planning-policy/local-plan-partial-update/submission-to-secretary-of-state>
4. Stevenage Borough Council Supplementary Planning Documents: Parking Provision SPD 2025; Design Guidance SPD 2025; Developer Contributions SPD 2025.  
<https://www.stevenage.gov.uk/planning-and-building-control/planning-policy/planning-library>
5. Hertfordshire County Council Local Transport Plan LTP4 2018-2031  
<https://www.hertfordshire.gov.uk/media-library/documents/about-the-council/consultations/ltp4-local-transport-plan-4-complete.pdf>
6. Government advice contained in the National Planning Policy Framework 2024 and the Planning Practice Guidance.  
[https://assets.publishing.service.gov.uk/media/67aafe8f3b41f783cca46251/NPPF\\_December\\_2024.pdf](https://assets.publishing.service.gov.uk/media/67aafe8f3b41f783cca46251/NPPF_December_2024.pdf)  
<https://www.gov.uk/government/collections/planning-practice-guidance>