

## 2.0 ENVIRONMENTAL IMPACT ASSESSMENT METHODOLOGY

### Introduction

- 2.1 This chapter explains the EIA methodology and describes the ES structure and content. In particular, it details the process of identifying and assessing the likely significant effects of the Development.
- 2.2 The ES has been prepared in accordance with the 2017 EIA Regulations, as amended, and reference has also been made to currently available good practice guidance on EIA including the Planning Practice Guidance issued by the Ministry of Housing, Communities and Local Government<sup>i</sup>.

### Scoping

- 2.3 Scoping involves focusing the content of an ES on issues of significance. It is an important tool for identifying the likely significant effects of a proposed development through its design, construction and completed phases and ensures the appropriate mitigation options are considered where necessary.
- 2.4 Formal scoping is provided for in the EIA Regulations but is not mandatory. As the Applicant and consultant team had been in dialogue with statutory consultees and GBC throughout the pre-application process, including when they were consulted by the Secretary of State during the preparation of the Screening Direction (which is explained in Chapter 1), it was considered that formal scoping would not provide any more information on what should be covered within the ES, or its methodology than was already known. The scope of the ES was informally agreed with GBC on the 17<sup>th</sup> December 2020 (Appendix 1.8) The informal scoping exercise aimed to scope out all assessment topics with the exception of Landscape and Views, Biodiversity and Water Resources and Flood Risk, which were those issues considered of relevance within the Screening Direction and subsequent correspondence with GBC. The key issues raised during informal scoping exercise and the location where they are addressed in the ES are set out in Table 2.1. The comments are taken from the letter from GBC included at Appendix 1.8.

**Table 2.1: Issues raised in the EIA Scoping Process**

Issue Raised during scoping	ES Chapter where addressed
The Applicant should ensure the ES complies with the requirements of the Town & Country Planning (Environmental Impact Assessment) Regulations 2017, and in particular Schedule 4 on the information to be provided.	Detailed in Chapter 1 and present throughout technical chapters 5-7
With regards to the cumulative effects assessment, the council is in	Chapter 2 outlines the

Issue Raised during scoping	ES Chapter where addressed
<p>general agreement with the list of developments to be considered as set out in your letter. We also note the clarification from Karen Rose (on behalf of the Secretary of State) on whether the Wisley Airfield major housing scheme should be considered and the applicant's intention to exclude this. Whilst this may not fall within the current narrow definition of cumulative development within the Regulations, we would nonetheless encourage the applicant to consider it particularly as they are the project promoter and have detailed knowledge of the proposals as they currently stand.</p>	<p>cumulative schemes which have been considered in technical chapters 5-7</p>
<p>It is acknowledged the ES will focus on hydrology, landscape and visual, and biodiversity. We note the suggestion in the letter from Barton Willmore that the scope of the biodiversity chapter will be limited to providing only the additional information requested by Natural England however, as this is a statutory ES, each technical chapter should present a full description and assessment of impacts and mitigation measures, including the sensitivity of receptors and criteria used to assess the magnitude and significance of impacts. This is in order that the planning authority is provided with sufficient information to make an informed decision on the environmental effects of the proposed development and ensure compliance with the EIA Regulations and best practice.</p>	<p>Chapter 6 Biodiversity</p>
<p>The ES should include discussion of the reasons for why other topics have been scoped out and any mitigation measures that will be implemented to avoid or minimise impacts</p>	<p>Chapter 2 EIA Methodology, Table 2.2</p>

2.5 The topics scoped out of the ES and explanatory justification is provided in Table 2.2.

**Table 2.2: Topics Scoped Out of the ES**

Assessment Topic	Justification for Scoping out of the ES
<p>Transport and Access</p>	<p>Owing to the Development comprising engineering works, the Development will not change the traffic flows in and around the Site at the operational phase. A Construction Environmental Management Plan (CEMP) will control the movement of construction vehicles (HGVs) in the local area to ensure effects from construction traffic are managed to acceptable levels.</p>
<p>Air Quality</p>	<p>Owing to the Development comprising engineering works, the Development will not change the traffic flows in and around the Site at the operational phase. A CEMP will control the movement of construction vehicles (HGVs) in the local area to ensure effects from construction traffic are managed to acceptable levels.</p>
<p>Noise and Vibration</p>	<p>Owing to the Development comprising engineering works, the Development will not change the traffic flows in and around the Site at the operational phase. A CEMP will control the movement of construction vehicles (HGVs) in the local area to ensure effects from construction traffic are managed to acceptable levels.</p>
<p>Population and Human Health</p>	<p>The Development does not involve the generation of a new population owing to its use and therefore there are no anticipated effects with regard to Population and Human Health within the scope of this ES.</p>
<p>Agricultural</p>	<p>The Site covers 17.5ha of arable land which is identified as Agricultural Land</p>

<b>Assessment Topic</b>	<b>Justification for Scoping out of the ES</b>
Land	Classification grading ranging from Grade 2 to Subgrade 3b. The Development would not result in a loss of more than 20ha of Best and Most Versatile (BMV) agricultural land (Natural England Technical Information Note 049 <sup>ii</sup> ). Thus, the Development is not anticipated to generate significant effects on agricultural land and this topic has been scoped out of this ES.
Aviation Safety	<p data-bbox="499 465 1487 663">Air Within the FWA but outside the Site boundary, there is an operational NATS Beacon (Ockham VHF Omni-directional Range 'VOR' and Distance Measuring Equipment 'DME' operated by NATS. The Development does not seek to remove beacons. The proposed earthworks (up to 4m Above Ordnance Datum (AOD)) would be below the limit set by NATS for development in the vicinity of any beacon (45m AOD). Furthermore, the Development would also not encroach into the safeguarding envelope of the NATS equipment at the FWA site (Plans attached at Appendix 2.1).</p> <p data-bbox="499 696 1487 779">The submitted planning statement proposed that (inter alia), a condition should be attached to the decision notice relating to the parameters approved and construction with respect to the ongoing operation by NATS of the Beacon.</p> <p data-bbox="499 813 1487 873">Consultation with NATS stated this position via email on the 8<sup>th</sup> January 2021 (Appendix 2.2).</p> <p data-bbox="499 907 1487 967">Therefore, there are no anticipated effects with regards to aviation air safety and this has been scoped out of this ES.</p>
Contaminated Land	<p data-bbox="499 996 1487 1108">The Site comprises mainly agricultural land with some areas of hard surfacing in the north west, on land formerly used as an area of hangers and hardstanding for the airfield. These areas of hardstanding will not be modified as part of the Development.</p> <p data-bbox="499 1142 1487 1377">A series of investigatory works concluded that the soil and groundwater have not been found to be significantly contaminated and no widespread remediation is considered necessary for the low sensitivity proposed use as open space. The restriction of the current proposed works to agricultural areas only means that remediation is not considered necessary at this stage. A letter detailing that no significant environmental effects with regards to contaminated land are expected was submitted alongside the planning application and can be found at Appendix 2.3. On this basis, contaminated land is scoped out of this ES.</p>
Waste	During construction, waste would be managed in accordance with the CEMP submitted in support of the planning application. There will be no generation of waste once the Development is complete. On this basis the likely significant effects of waste generation during the demolition, construction, and operational phases of the Development are not considered to be significant and therefore waste is scoped out of the ES.
Heritage	<p data-bbox="499 1617 1487 1700">There are no statutory historic designations within the site i.e there are no Scheduled Monuments, Listed Buildings, Registered Battlefields or Registered Historic Parks and Gardens.</p> <p data-bbox="499 1733 1487 1816">The Scheduled Monuments are the Bowl Barrow and Bell barrow west of Cockcrow Hill located c. 1.2km north-east of the site. A further seven Scheduled Monuments are located within 5km of the site.</p> <p data-bbox="499 1850 1487 1995">The Grade I Church of All Saints and the Grade II* Stables to Okham House lies c. 0.85km to the south west. The Grade II* Chatley Semaphore Tower lies c. 0.9km to the north east. There are 19 Grade II Listed Buildings along and just off Ockham Lane and the B2039 between 0.5km and 1.2km to the east, south east, south and south west of the site.</p>

Assessment Topic	Justification for Scoping out of the ES
	<p>The Grade II* Registered Park and Garden, and related Grade II Listed Building of the Royal Horticultural Society (RHS) Gardens, Wisley lies c. 300m to the north west. However, RHS Wisley is separated from the site by the A3.</p> <p>Conservation Areas have been designated at Ockham, c. 0.6km to the south, Ripley, c. 1km to the west and Ockham Mill, c. 1km to the north west.</p> <p>Owing to the distance, physical separation (including existing built form and topography), as well as consideration of the characteristics of the Development, no significant effects on built heritage assets is considered likely.</p> <p>A geophysical survey was undertaken across large parts of the site (some areas, including the runway and hardstanding were unsuitable for survey) in 2015. This suggested a low potential for archaeological features/deposits to survive on the site. Archaeology Trial trenching has begun to further test this conclusion and the methodology has been agreed with SCC. There are no indications that archaeological features of the highest level of significance survive at the location of the Development. The work being undertaken will negate the need for a pre-commencement condition relating to archaeological evaluation.</p> <p>No likely significant effects are anticipated and therefore this topic has been scoped out of the ES.</p>
Accidents and Disasters	<p>The Development is for engineering works to facilitate the first phase of a SANG which is not considered to be hazardous. The potential for flooding is considered within the Water Resources and Flood Risk chapter of this ES and is the only natural disaster likely to be relevant. During construction, all applicable health and safety legislation will be complied with. No likely significant effects are anticipated and therefore this topic has been scoped out of the ES.</p>
Climate Change	<p>A standalone chapter for Climate Change has not been prepared given the scope of the Development. Any issues pertinent to climate change are addressed in Chapter 3.</p>

### Consultation Process

- 2.19 Consultation was undertaken with the local community, GBC and Natural England (NE) before submission of the planning application and is ongoing.
- 2.20 The Applicant maintains a website about the potential future redevelopment of the FWA: <https://www.wisleyairfield.com/> and issues monthly newsletters. The submission of the planning application for the Development was publicised in the October 2020 newsletter: [https://www.wisleyairfield.com/wp-content/uploads/2020/11/TW\\_Wisley\\_October\\_Newsletter.pdf](https://www.wisleyairfield.com/wp-content/uploads/2020/11/TW_Wisley_October_Newsletter.pdf)
- 2.21 Further publication and consultation is described in Chapter 1 of this ES.

- 2.22 Natural England confirmed at a meeting on the 12<sup>th</sup> June 2020 that they had no objection in principle to the enabling works application. Natural England were also consulted on the draft version of the Ecological Impact Assessment (EcIA) in September 2020 and had no comments (Appendix 2.4).
- 2.23 Details on publicising the submission of the ES in accordance with Regulation 20 of the EIA Regulations is included in Chapter 1.

#### Assessment Methodology

- 2.24 The EIA Regulations stipulate that an ES should identify, describe and assess the likely significant effects of a development on the environment. Therefore, this ES identifies and assesses the likely significant effects of the Development in relation to both the construction and the completed phases. Environmental effects have been evaluated with reference to definitive standards and legislation where available. Where it has not been possible to quantify effects, qualitative assessments have been carried out, based on available knowledge and professional judgement. Where uncertainty exists, this has been noted in the relevant assessment chapter.

#### Structure of Technical Chapters

- 2.25 Each technical chapter of the ES (Chapters 5-7) have been set out broadly in line with Table 2.3 below.

**Table 2.3: Structure of the Technical Chapters**

Heading	Content
Introduction	Each of the technical chapters begins with an introduction providing context to the EIA completed.
Policy Context	This section includes a summary of policies of relevance to the environmental discipline and explains its purpose in the context of the Development and the ES.
Assessment Methodology	This section describes the method and approach employed in the assessment of likely significant effects, the criteria against which the significance has been evaluated, the sources of information used and any technical difficulties encountered. Relevant legislation is also identified.
Baseline Conditions	This section describes and evaluates the baseline environmental conditions i.e. the current situation and anticipated changes over time assuming the Site remains undeveloped.
Likely Significant Effects	This section identifies the likely significant effects on the environment resulting from the Development during construction and operational phases. A description of the likely significant effects of the Development and an assessment of their predicted significance is provided.

Heading	Content
Mitigation Measures	This section describes the measures which would be implemented to mitigate against potential adverse impacts. Where possible, enhancement measures have also been proposed.
Residual Effects	The residual effects, i.e. the remaining effects of the Development assuming implementation of the proposed mitigation measures, have been estimated and presented.
Cumulative Effects	This section considers the cumulative effects of the Development with committed developments identified within the vicinity of the Site. Any likely significant effects on the environment arising in this respect are set out in this section.
Summary	Each technical chapter concludes with a brief summary outlining the potential residual effects for the construction phase (short/medium) and operation (medium/long-term) phase of the Development.

### Baseline Conditions

2.26 The ES includes a description of the prevailing environmental conditions, the 'Baseline Conditions', against which the likely significant environmental effects of the Development have been assessed. These are taken to be the conditions at the time or immediately prior to the submission of the planning application in 2020. Each technical assessment has also identified the Future Baseline conditions in the absence of the Development.

### Determining Significance

2.27 It is broadly accepted that significance reflects the relationship between two factors:

- The actual change taking place to the environment (i.e. the magnitude or severity of an effect); and
- The sensitivity, importance or value of the affected resource or receptor.

2.28 The technical chapters (5 – 7) set out the methodology for determining the significance of effect based on the above considerations and relevant discipline-specific guidance.

### Magnitude

2.29 The magnitude of an effect is often quantifiable in terms of, for example, extent of land take, or predicted change in noise levels.

### Sensitivity

2.30 The sensitivity, importance or value of the resource or receptor is normally derived from:

- Legislative controls;
- Designated status within the land use planning system;
- The number of individual receptors such as residents;
- An empirical assessment on the basis of characteristics such as rarity or condition; and/or
- Ability of the receptor to absorb change.

### **Significance**

- 2.31 The significance of an environmental effect is determined by the interaction of magnitude and sensitivity, whereby the impacts can be beneficial or adverse.

### **Mitigation**

- 2.32 Any adverse environmental effects have been considered for mitigation at the design stage and, where practicable, specific measures have been put forward. Where the effectiveness of the mitigation proposed has been considered uncertain, or where it depends upon assumptions of operating procedures, data and/or professional judgement has been introduced to support these assumptions.
- 2.33 Mitigation recommended during the demolition and construction phase is set out in the CEMP submitted alongside this application (and included at Appendix 3.2) and would be implemented throughout the duration of the works. A summary of mitigation measures from the CEMP is set out in Chapter 3 of this ES: Site & Development Description.

### **Cumulative and Interactive Effects**

#### *Cumulative Effects*

- 2.34 A requirement of the EIA Regulations is to assess cumulative effects. Cumulative effects are generally considered to arise from the combination of effects from the Development and from other proposed or permitted schemes in the vicinity, acting together to generate elevated levels of effects. The assessment has been informed by Planning Practice Guidance<sup>1</sup>, specifically the section: 'When should cumulative effects be assessed?' which states:

*"Each application ... should be considered on its own merits. There are occasions, however, when other existing or approved development may be relevant in determining whether significant effects are likely as a consequence of a proposed development. The local planning*

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<sup>1</sup> Paragraph: 024 Reference ID: 4-024-20170728, Revision date: 28/07/2017

*authorities should always have regard to the possible cumulative effects arising from any existing or approved development.”*

2.35 The schemes that have been included as part of the cumulative effects assessment are those set out in Table 2.4 and shown on Figure 2.1, as agreed with GBC during informal scoping.

**Table 2.4 Cumulative Schemes**

Project Reference	Description	Status	Distance
08/P/01472 Guildford Borough Council	Construction of a fully enclosed in-vessel composting facility on a site of 16.75ha, including access.	Appeal allowed in 2008. Consultation made in 2011 (11/P/00445). No objection.	Within the site boundary.
19/P/00377 Guildford Borough Council	Validation of condition 17 of 16/P/00976, approved to allow alterations to the scheme and substitution of drawings numbers. Royal Horticultural Society Gardens.	Approved May 2019.	Approximately 350m to the north-west
-	M25 Junction 10/A3 Wisley Interchange Improvement.	At Examination. DCO expected to be made May 2021	Site boundary to the west.
19/P/02223 Guildford Borough Council	Hybrid (part full/part outline) application comprising: Full planning permission for 220 residential dwellings (Use Class C3) with associated open space and landscaping, means of access, parking, drainage, utilities and infrastructure works, temporary acoustic fencing, and other associated works; and Outline planning permission, with all matters reserved except for access, for up to 300 residential dwellings (Use Class C3) and Travelling Showpeople plots (Sui Generis) with associated open space and landscaping (including a landscape bund and acoustic fencing), means of access, enabling infrastructure and other associated works. (Amended plans received 18.03.2020 for design, layout, parking of phase 1 and location of custom build homes in outline).	Submitted – determination expected December 2020.	Approximately 2.9km to the south west.
19/P/01541 Guildford Borough Council	Outline application for the demolition of two dwellings and alteration to access to allow for outline consent with all matters reserved (except for means of access from Ockham Road North not to include internal roads) for up to 110 dwellings and up to 99sqm of office floor space (Use Class B1a), open space, sustainable urban drainage system and associated	Approved 04/12/2019.	Approximately 2.9km to the south.

Project Reference	Description	Status	Distance
	landscaping, infrastructure and earthwork's at Lollesworth Fields, Ockham Road North, East Horsley (Resubmission of 19/P/00634).		
19/P/02240 Guildford Borough Council	Change of use of the site to 16 hectares of publicly accessible open space with associated landscaping, access, parking and other works to facilitate a bespoke Suitable Alternative Natural Greenspace (SANG).	Under consideration.	Approximately 2.9km to the south west.
PLAN/2018/0359 Woking Borough Council  Subsequent RM: COND/2020/0028 COND/2019/0044	Planning application for the demolition of the vacant Sherwood House office building (B1 use class); removal of all former MOD buildings, hardstanding and structures across the site; the erection of 115 new market dwellings (C3 use class) and associated garages); the erection of 54 affordable dwellings (C3 use class).	Approved Feb 2019.	Approximately 4km to the north west.
19/P/00027 Guildford Borough Council	Proposed erection of 75 dwellings with associated vehicular and pedestrian access via Tannery Lane, car parking, secure cycle storage and landscaping.	Approved September 2019.	Approximately 4.5km to the south-west.
Hybrid: 14/P/02109  RM: 19/P/01451 Guildford Borough Council	Hybrid planning application for outline permissions for the erection of a replacement secondary school for Howard of Effingham and up to 258 residential dwellings with means of access. Full planning application for erection of 37 dwelling with access, landscaping and parking.  Reserved matters application pursuant to hybrid application 14/P/02109 for the replacement of Howard of Effingham School to consider the detailed design, associated playing fields, MUGA, parking and landscaping works (amended plans received which alter the size of the sports hall from 33m x 27m to 34.5m x 25.87m).	Hybrid appeal allowed subject to conditions 21/03/2018.  Reserved Matters approved 10/01/2020.	Approximately 5km to the south east.

2.36 The potential future redevelopment of the FWA for residential led use in accordance with policy A35 of the Guildford Local Plan has also been considered in the cumulative effects assessment at the request of GBC. There is currently no ES or planning application for such development

so, for the purposes of this ES, the following description of development has been assumed (which matches that submitted in a formal request for a Scoping Opinion for the wider A35 site in December 2020):

- Approximately 2,000 homes (use class C3);
- Approximately 100 units of use class C2;
- Approximately 1,800 square metres (sqm) of employment floorspace (use Class E);  
Approximately 1100sqm of comparison and convenience retail (use Class E);
- Approximately 2,500 sqm of employment floorspace (Use class B2/B8), gypsy and traveller pitches; and
- A new Local Centre.

2.37 Each of the technical assessments considers the likely significant cumulative effects of the Development with the cumulative schemes set out in Table 2.7 and FWA/policy A35 development as described above. The level of detail of assessment has been dependent on the information available for each scheme and has generally been undertaken in a qualitative manner. Where no cumulative effects are predicted, this has also been stated.

#### Interactive Effects

2.38 Interactive effects are also considered in the ES. Interactive effects arise where effects concerned with more than one technical discipline affect a single receptor. Examples are such things as:

- lighting and air quality on ecology; and
- noise and emissions during construction on residents.

2.39 Interactive effects are considered in Chapter 8 Schedule of Mitigation and Residual Effects.

#### **Assumptions and Limitations**

2.40 The principal assumptions that have been made and any limitations that have been identified, in preparing this ES are set out below. Assumptions relevant to specific topics have been made in the appropriate chapter:

- All of the principal existing land uses adjoining the Site remain;
- Information received by third parties is complete and up to date;
- The design, construction and completed stages of the Development will satisfy minimum environmental standards, consistent with contemporary legislation, practice and knowledge;

- Significant environmental effects have been assessed using the development parameters;
- Each chapter within the ES sets out the limitations and assumptions regarding any assessment scenarios that have been established in order to assess the Development;
- Conditions will be attached to the planning permission that will control disturbance during the construction works;
- Necessary off-site services infrastructure for the Development will be provided by statutory undertakers; and
- The planning permission, when granted, will contain conditions that will be sufficient to limit the Development to what has been assessed.

### **Objectivity**

- 2.41 The technical studies undertaken within the ES have been progressed in a transparent, impartial and unbiased way with equal weight attached, as appropriate, to beneficial and adverse effects. Where possible, this has been based upon quantitative and accepted criteria together with the use of value judgments and expert interpretations.
- 2.42 The assessment has been explicit in recognising areas of limitation within the ES and any difficulties that have been encountered, including assumptions upon which the assessments are based. Where appropriate, the assessment of significance has been given confidence levels.

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<sup>i</sup> <https://www.gov.uk/guidance/environmental-impact-assessment>

<sup>ii</sup> Natural England (December 2012) Technical Information Note TIN049 Second edition, Agricultural Land Classification: protecting the best and most versatile agricultural land.