

APPENDIX 1.8
INFORMAL ES SCOPING RESPONSE GBC



Lucy Wood
Environmental Planning Director,
Barton Willmore

17/12/2020

Dear Lucy

20/S/00003 EIA Scoping for an ES to support the application for enabling works to facilitate the first phase of SANG at the former Wisley Airfield site, Wisley Airfield, Ockham Lane, Ockham

We have reviewed and considered the proposed scope of the EIA for the above proposed development.

In general, it accords with the discussion on 25th November and is in line with the screening direction issued by the Secretary of State on 9th December. However, we would make the following comments in relation to the information that should be provided within the Environmental Statement (ES) supporting the planning application for the works.

Notwithstanding the agreed reduced technical scope of the EIA, the applicant should ensure that 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, which as a minimum should include:

1. A description of the development, including in particular:
 - (a) a description of the location of the development;
 - (b) a description of the physical characteristics of the whole development, including, where relevant, requisite earthworks, and the land-use requirements during the construction and operational phases;
 - (c) a description of the main characteristics of the operational phase of the development; and
 - (d) an estimate, by type and quantity, of expected residues and emissions (such as water, air, soil and subsoil pollution, noise, vibration, light, heat, radiation and quantities and types of waste produced during the construction and operation phases).
2. A description of the reasonable alternatives (for example in terms of development design, location, size and scale) studied by the developer, which are relevant to the proposed project and its specific characteristics, and an indication of the main reasons for selecting the chosen option, including a comparison of the environmental effects.
3. A description of the baseline environmental conditions and the likely future conditions under a 'no development' scenario.



4. A description of the likely significant effects of the development on the environment resulting from, *inter alia*:

- (a) the construction and existence of the development;
- (b) the use of natural resources, in particular land, soil, water and biodiversity, considering as far as possible the sustainable availability of these resources;
- (c) the emission of pollutants, noise, vibration, light, heat and radiation, the creation of nuisances, and the disposal and recovery of waste; and
- (d) the cumulation of effects with other existing and/or approved projects, taking into account any existing environmental problems relating to areas of particular environmental importance likely to be affected or the use of natural resources.

With regards to the cumulative effects assessment, the council is in 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. To ignore it runs the risk of challenge by objectors of 'salami slicing' the development to avoid full and proper consideration of the environmental impacts arising from the two schemes which, the council still maintains, are inextricably linked.

- 5. The description of the likely significant effects should cover the direct effects and any indirect, secondary, cumulative, short-term, medium-term and long-term, permanent and temporary, positive and negative effects of the development.
- 6. A description of the forecasting methods or evidence, used to identify and assess the significant effects on the environment, including details of difficulties (for example technical deficiencies or lack of knowledge) encountered compiling the required information, the main uncertainties involved and how these have been accounted for in the assessment of impacts and effects.
- 7. A description of the measures envisaged to avoid, prevent, reduce or, if possible, offset any identified significant adverse effects on the environment and, where appropriate, of any proposed monitoring arrangements (for example the preparation of a post-project analysis). That description should explain the extent, to which significant adverse effects on the environment are avoided, prevented, reduced or offset, and should cover both the construction and operational phases.
- 8. Details of proposed monitoring during and post-construction to enable the effectiveness of mitigation measures to be confirmed. The council may require further mitigatory measures to be implemented should the proposed mitigation prove not to be effective. Details of the proposed monitoring, including who will be responsible and how the results will be communicated, should be included in the Construction Environmental Management Plan (CEMP).



9. The ES should include evidence of the consultation undertaken with the statutory bodies and other relevant stakeholders with respect to the main topics, the issues raised and how these have been addressed in the scheme design and environmental assessment.

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.

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. These should be included in the Schedule of Mitigation (see below).

The ES should include the following:

- Schedule of Mitigation
- Outline Construction Environmental Management Plan (CEMP)
- Non-Technical Summary (standalone document) – this should be kept brief but include all the salient points from the ES and be written in language that makes the document accessible to a wide audience, many of whom will not have a technical background.
- Technical appendices, as appropriate. The applicant is reminded that all pertinent information should be presented within the main volume of the ES with reference to appendices kept to a minimum for the purpose of providing additional detail and supplementary information.

The applicant is encouraged to adhere to the principle of proportionate EIA by making use of tables, images and graphics to convey key findings of the assessments, illustrate design features and mitigation measures, and reduce the overall volume of text.

Yours sincerely

Tim Dawes, Planning Development Manager