

From: [Graham Parrott](#)
To: [Gatwick Airport](#)
Cc: [Beth Howland-Smith](#); [Patrick Arthurs](#); [Chris Berry](#); [Graeme Clark](#)
Subject: FW: Ref:TR020005-000008 Gatwick North Runway EIA Scoping Consultation
Date: 22 October 2019 08:40:44
Attachments: [Gatwick Airport EIA Scoping Opinion response letter updated 21.10.19 \(002\).docx](#)

Dear Sir/Madam

I am writing further to the email from my colleague, Patrick Arthurs, enclosing the Council's response to the consultation on the EIA Scoping for this project.

I have attached an updated version of the response. This contains the addition of a comment drawing attention to the fact that Waverley Borough Council has recently formally declared a Climate Emergency and noting that any airport expansion could have an adverse impact on the environment in Waverley.

Yours faithfully

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From: Patrick Arthurs <Patrick.Arthurs@waverley.gov.uk>
Sent: Tuesday 01 October 2019 16:17
To: 'gatwickairport@planninginspectorate.gov.uk'
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Subject: Ref:TR020005-000008 Gatwick North Runway EIA Scoping Consultation

Please find attached the response from Waverley Borough Council in relation to the above EIA Scoping consultation. If you have any queries please do not hesitate to contact me.

Kind regards

Patrick Arthurs

Major Sites Consultant
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training or monitoring
Date: 21st October 2019

Dear Sir/Madam

Waverley Borough Council Gatwick Airport North Runway – EIA Scoping Opinion

Waverley Borough Council has considered the Environmental Impacts Assessment (EIA) Scoping Report for Gatwick Airport Northern Runway development proposal. The Council's comments are as follows:

The purpose of an environmental statement is to enable the environmental impacts of a proposed development to be fully considered, alongside the anticipated economic or social benefits of the development (as detailed in the planning statement), before the application for planning consent is determined. The environmental statement provides environmental information to aid the decision making process.

In terms of presentation and content the submitted environmental statements should be laid out clearly, with minimum use of technical terms (where feasible) and should provide an objective and realistic description of the likely significant impacts of the proposed developments. The information should be presented so as to be comprehensible to the specialist and non-specialist alike. The environmental statement should be concise with supporting technical information placed in appendices.

The baseline should describe existing conditions both at the site and the surrounding area that would be affected by the

proposed development. The baseline situation should be described for each aspect of the environment that would be affected with information provided about the dates of any surveys or sampling work undertaken. The baseline data reported in the environmental statement should be the most relevant and up to date, and a consistent approach to data collection and recording should be taken across all the environmental statements submitted in respect of the different components of the proposed Scheme.

For each aspect of the environment the baseline data sources relied upon should be identified, and details (including dates) should be provided of any survey or sampling work undertaken. The timing and scope of all surveys or sampling programmes should, wherever possible be agreed with the relevant planning authority, with relevant statutory bodies and/or appropriate consultees.

The EIA Regulations require the identification of the 'likely significant effects of the development on the environment' (Regulation 18(3)(b)). As a matter of principle, the relevant planning authorities employ a precautionary approach to judging 'significant effects'. In other words 'likely to affect' will be taken as meaning that there is a probability or risk that the development will have an effect, and not that a development will definitely have an effect.

The environmental statement must clearly define the meaning of 'significant' that has been applied in the context of each of the aspects of the environment that have been assessed, and the likely significant impacts of each component of the Scheme must be clearly identified. Quantitative criteria and/or standards should be used where available. This should also apply to the consideration of cumulative impacts, and impact inter-relationships. A consistent approach should be taken across all the environmental statements when defining impact significance.

Mitigation measures may fall into a range of categories namely: avoidance of impacts; reduction in the magnitude of impacts; or compensation for losses incurred through unavoidable impacts; and should be identified as such in the technical chapters of each environmental statement.

Mitigation measures should not be developed in isolation, as they may relate to more than one aspect of the environment (e.g. mitigation to address issues of landscaping, surface water management and biodiversity), and to more than one component of the Scheme. For each aspect of the environment under consideration, the environmental statement should set out the mitigation measures required to prevent, reduce and where possible offset any significant adverse effects. The environmental statement should also identify any residual effects that could be expected to persist even with mitigation in place. Any proposed mitigation should be discussed and agreed with the relevant planning authority and with relevant consultees.

The mitigation measures proposed in each technical chapter should be cross-referred to specific conditions or legal agreements that could be attached to any permission granted.

It is further recommended that a section is included in each environmental statement in which the mitigation measures proposed across all the technical chapters are collated, and presented as an integrated package of mitigation.

All specialist chapters should be cross-referenced to other relevant disciplines (e.g. air quality impacts on ecology, traffic impacts on air quality, etc.). Consideration of the potential for interactions between the different aspects of the environment is essential to the production of a robust assessment. The environmental statement should not be a collection of separate specialist chapters, but a comprehensive assessment of the environmental impacts of the proposed components of the wider Scheme, and should account for how the identified impacts could be mitigated or avoided, or how suitable compensation could be provided to offset those effects.

In accordance with the requirements of paragraph 6 of Schedule 4 of the EIA Regulations, each technical chapter should include a discussion of any difficulties (e.g. technical deficiencies, lack of know-how, etc.) encountered by the proponent during the preparation of the environmental statements.

Overview of the proposed Technical Content of the Environmental Statement: The environmental statement should be proportionate in the consideration of the aspects of the environment listed under Paragraph 2 of Regulation 4 of the EIA Regulations. Those aspects of the environment that are subject to the most significant impacts from the components of the wider Scheme to which the application would relate should be the primary focus of the environmental statement.

The applicant has advised that it is their intention to produce a single environmental statement, which would cover the following topics:

- Historic Environment
- Landscape, Townscape and Visual Resources
- Ecology and Nature Conservation
- Geology and Ground Conditions
- Water Environment
- Traffic and Transport
- Air Quality
- Noise and Vibration
- Climate Change and Carbon
- Socio-economic Effects
- Health and Wellbeing
- Agricultural Land Use and Recreation
- Waste
- Major Accidents and Disasters
- Cumulative Effects and Inter-relationships
- Transboundary Effects

Topics proposed to be scoped out of the EIA process:

- Planning Policy Context
- Material Assets
- Radiation and Heat
- Daylight, Sunlight and Microclimate
- Decommissioning Effects
- Airspace Change Process

Waverley Borough Council has indicated in previous consultations in relation to the airport's expansion that it is generally supportive of the potential economic growth provided it can be clearly demonstrated that no negative impacts in relation to traffic congestion, air-quality, noise, biodiversity and habitats implications for Waverley residents and businesses arise.

The eastern boundary of the Borough is located only 9 miles (14 km) west of the runway. The Borough therefore sits beyond the 5km buffer from the application site where the majority of topic areas listed above will be tested, including: landscape, topography, geology, flood risk, air-quality management area and baseline (Figure 7.7.1) and Baseline Noise Level Survey (7.8.1).

The Air Noise Baseline for day and night, Figure 7.8.2 and 7.8.3, includes one site within the Borough at Alfold where Air Noise Baseline for both day and night will be measured. The site between Ellen's Green and Oakwood Hill appears to be on the edge of the Waverley Borough boundary. The Council is concerned about potential noise impacts over a wider area, including other parts of Waverley Borough, and considers that these should be addressed in the Environmental Statement. This should also have regard to noise impacts at different times of the day.

No air quality measurement sites are located within the Borough or indeed beyond the close confines of the Gatwick Site. Any potential impacts on air quality from aircraft, over a wider area, including Waverley Borough, need to be fully assessed and the methodology for the assessment should take account of this. Additional vehicle movements across the Borough or its fringes as a result of the airports expansion may also have an impact on the air quality within the Borough, this will need to be considered.

In relation to transport matters, the Council would be interested in understanding further how sustainable access to the Airport can be improved for Waverley residents and businesses as part of the development.

The climate change baseline presented in the scoping request report deals with increases in temperature and of greenhouse gas emissions. The area that would be affected by the development, in terms of the greenhouse gas emissions attributed to the relevant boroughs should be included as part of the EIA. Aviation is set to be the biggest



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source of UK emissions by 2050. The assessment should include a cumulative impact of CO2 emissions arising from both the proposed Gatwick and Heathrow expansions and how these may impact on Waverley Borough residents and businesses as well as the environment, biodiversity and habitat.

I should add that Waverley Borough Council has recently formally declared a Climate Emergency and notes that any airport expansion could have adverse impacts on the environment of Waverley.

I trust you will take these comments into account.

Yours faithfully

Patrick Arthurs

Patrick Arthurs
Major Sites Consultant

