



Gatwick Airport Northern Runway Project

Planning Statement Appendix C – Planning Policy Compliance Table

Book 7

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Introduction

1. This Appendix to the **Planning Statement** (Doc Ref. 7.1) comprises Policy Compliance Tables which:
 - identify national policies relevant to the consideration of the Project; and
 - provide a summary of the Project's compliance with those policies, including cross references to key documents forming part of the DCO application where additional detailed information can be found.
2. The Applicant considers these policies to be important and relevant considerations to the assessment of the DCO.
3. The Policy Compliance Tables disaggregate relevant policy by 'theme'. The themes relate to and are informed by the assessment topics set out in the Section 8 of the **Planning Statement** (Doc Ref. 7.1).
4. The policy documents considered by this Appendix comprise:
 - a. Department for Transport - Aviation Policy Framework (March 2013);
 - b. Department for Transport - Airports National Policy Statement (June 2018);
 - c. Department for Transport - Beyond the Horizon: The future of UK aviation – Making best use of existing runways (June 2018);
 - d. Department for Transport - Flightpath to the Future: a strategic framework for the aviation sector (May 2022);
 - e. Department for Transport - Jet Zero strategy: delivering net zero by 2050 (August 2022);
 - f. Depart for Transport - National Networks National Policy Statement (December 2014); and,
 - g. Ministry of Housing, Communities and Local Government - National Planning Policy Framework (July 2021).

Aviation Policy Framework			
Theme	Policy Reference	Policy Description	Document reference demonstrating compliance
Principle of Development	5	The Government's primary objective is to achieve long term economic growth. The aviation sector is a major contributor to the economy and we support its growth within a framework which maintains a balance between the benefits of aviation and its costs, particularly its contribution to climate change and noise. It is equally important that the aviation industry has confidence that the framework is sufficiently stable to underpin long-term planning and investment in aircraft and infrastructure.	<p>The matter is discussed in Section 8 of the Planning Statement (Doc Ref. 7.1). The Project is anticipated to bring about significant benefits to the local economy.</p> <p>This benefit among others, as well as the adverse impacts of the Project are weighed in Section 9 of the Planning Statement (Doc Ref. 7.1).</p>
	9	One of our main objectives is to ensure that the UK's air links continue to make it one of the best-connected countries in the world. This includes increasing our links to emerging markets so that the UK can compete successfully for economic growth opportunities. To achieve this objective, we believe that it is essential both to maintain the UK's aviation hub capability and develop links from airports which provide point-to-point services (i.e. carrying few or no transfer passengers). This should be done in a balanced way, consistent with the high-level policies set out in this document and acknowledging Government's commitment to economic growth.	The Needs Case (Doc Ref. 7.2) addresses this and ES Chapter 17 (Doc Ref. 5.1) presents the assessment of effects relating to economics and employment. The Project is anticipated to bring about significant benefits to the local economy and to grow the UK's aviation hub capability in line with the aspiration of this policy.
	11	In the medium and long term beyond 2020 we recognise that there will be a capacity challenge at all of the biggest airports in the South East of England. There is broad consensus on the importance of maintaining the UK's excellent connectivity over the long term, but currently no consensus on how best to do this. A robust and generally agreed evidence base is needed before a decision can be made on the scale and timing of any requirement for additional capacity to maintain the UK's position as Europe's most important aviation hub. This is why Government established the Airports Commission in 2012.	This is discussed in Sections 3, 8 and 9 of the Planning Statement (Doc Ref. 7.1) and the Needs Case (Doc Ref. 7.2) justifies the principle of utilising the northern runway at Gatwick Airport. The Project would deliver additional airport capacity in the South East of England and is supported by a robust evidence base and is therefore considered to be compliant with this policy.
	1.41	The demand for aviation in the UK is concentrated in the South East, a densely populated region whose economy comprises multiple high-value	

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		sectors including finance, professional services, technology, media and fashion. This drives consistently high demand for aviation in the region, so that the five main South Eastern airports (Heathrow, Gatwick, Stansted, Luton and London City) account for nearly two-thirds of passengers at UK airports and nearly half of all air transport movements.	
Ecology and Nature Conservation	3.55	It is likely that any proposals for any new hub airport or nationally significant infrastructure would be taken forward through an Airports National Policy Statement (NPS). This would take a similar approach to existing NPSs and be consistent with the Government's stated policies on sustainability and environmental protection. Loss of protected habitats, protected species, protected landscape and built heritage, and significant impacts on water resources and ecosystems would only be advocated if there were no feasible alternatives and the benefits of proposals clearly outweighed those impacts. Any unavoidable impacts would be mitigated or compensated for. Our policy will be to ensure there is full consideration of the environmental impacts of the most credible options for maintaining our international connectivity.	Full consideration (including assessment and mitigation measures) of the environmental impacts resulting from the Project are found across the ES (Doc Ref. 5.1). Environmental matters are also discussed in Section 8 and the benefits and adverse impacts of the Project are weighed in Section 9 of the Planning Statement (Doc Ref. 7.1). These documents detail an extensive series of mitigations of the environmental impacts arising from the Project in demonstrating compliance with this policy.
Climate Change and Greenhouse Gases	12	Aviation's environmental impacts are both global (climate change) and local (primarily noise, as well as air pollution and surface access traffic congestion).	The ES (Doc Ref. 5.1) addresses 13 separate environmental topics in addition to the in-combination and cumulative effects of the Project. Noise impacts are addressed at Chapter 14 of the ES (Doc Ref. 5.1), air pollution impacts at ES Chapter 13 (Doc Ref. 5.1), surface access impacts at ES Chapter 12 (Doc Ref. 5.1), and greenhouse gas emissions at ES Chapter 16 (Doc Ref. 5.1). These
	2.4	Our objective is to ensure that the aviation sector makes a significant and cost-effective contribution towards reducing global emissions.	

Aviation Policy Framework			
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			documents detail an extensive series of mitigations of the environmental impacts arising from the Project in demonstrating compliance with this policy.
Socio-economics	1.57	One of our main aviation objectives is to ensure that the UK's air links continue to make it one of the best connected countries in the world. This includes increasing our links to emerging markets so that the UK can compete successfully for economic growth opportunities. To achieve this objective, we recognise the importance of both maintaining the UK's aviation hub capability and developing links from airports which provide point-to-point services (i.e. carrying very few or no transfer passengers). This must be done in a way consistent with the high level policies set out in this document.	The Needs Case (Doc Ref. 7.2) addresses this matter and confirms, in Section 6.4 of that document, that the Project will continue to ensure Gatwick's services are predominantly point-to-point, alongside confirmation, in Section 8.8 , that the Project will provide vital international links. ES Chapter 17 (Doc Ref. 5.1) assesses the effects associated with economics and employment and shows that significant benefits to the local economy would be brought about through the Project. The Project is therefore considered policy compliant.
	1.17	In addition to its economic contribution, aviation provides wider social benefits, enabling UK citizens to experience different cultures or enjoy a well-earned holiday. In an increasingly globalised society visiting friends and relatives is an increasingly important reason for flying; for example in 2011 it was the most common purpose of travel at Heathrow (36% of trips), Stansted (45%) and Luton (43%). Visiting friends and relatives also forms a significant proportion of business for airports outside London and the South East, which in some cases helps maintains the viability of their air links.	
Noise and Vibration	17	Our overall objective on noise is to limit and where possible reduce the number of people in the UK significantly affected by aircraft noise. The document makes clear that the acceptability of growth in aviation depends to a large extent on the industry continuing to tackle its noise impact and confirms that the Government expects the industry at all levels to continue to address noise. We recognise that the manufacturing industry across Europe has committed to ambitious long-term goals to reduce aviation emissions to one-quarter of 2000 levels by	Noise matters are addressed in ES Chapters 8 and 14 (Doc Ref. 5.1) as follows; <ul style="list-style-type: none"> - assessment years for identifying the likely significant effect of air noise are set out in Section 14.6;

Aviation Policy Framework			
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		2050 and to halve perceived aviation noise. To achieve this, we want to incentivise noise reduction and mitigation, and we also want to encourage better engagement between airports and local communities and greater transparency to facilitate an informed debate.	<ul style="list-style-type: none"> - a description of the noise sources included in the assessment are set out in Sections 14.4 and 14.5; - the assessment of significant effects covering the identified source of noise and vibration are described in Section 14.9; - the effect of noise on sensitive landscape and visual receptors is covered in ES Chapter 8 (Doc Ref. 5.1); - the assessment of effects due to construction activities and changes to the noise environment as a result of the Project is provided in Section 14.9; - the mitigation measures to address noise effects, as well as the Noise Envelope, are described in Section 14.8; and - best practice construction noise mitigation measures are secured through the Code of Construction Practice (CoCP) provided as ES Appendix 5.3.2 (Doc Ref. 5.3).
	3.12	The Government's overall policy on aviation noise is to limit and, where possible, reduce the number of people in the UK significantly affected by aircraft noise, as part of a policy of sharing benefits of noise reduction with industry.	

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			In relation to all of the above matters, the Project has been designed with the aim of maximising noise reduction and mitigation and minimising the number of people affected by aircraft noise. Policy compliance on this matter has therefore been demonstrated.
Traffic and Transport	1.97	We are committed to working with airport operators, transport operators, local authorities and LEPs to improve surface access to airports across the country, whilst taking into account the associated environmental impacts. We are already contributing funding to make this happen.	The transport network, both existing and future, with proposed improvements, is described in ES Chapter 12 (Doc Ref. 5.1).
	5.11	All proposals for airport development must be accompanied by clear surface access proposals which demonstrate how the airport will ensure easy and reliable access for passengers, increase the use of public transport by passengers to access the airport, and minimise congestion and other local impacts.	<p>Commitments to increasing the use of public transport by air passengers are set out in Section 12.8 of ES Chapter 12 (Doc Ref. 5.1). The Transport Assessment (Doc Ref. 7.4) incorporates a Framework Travel Plan that will support the achievement of those targets and outlines proposals for comprehensive monitoring of the mode share.</p> <p>The highway interventions (principally described in Section 12.8 of ES Chapter 12 (Doc Ref. 5.1) and in more detail in the Surface Access Commitments forming ES Appendix 5.4.1 (Doc Ref. 5.3)) form part of the Project and will be funded by the applicant, complying with the general</p>

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			<p>requirement for developments to pay the cost of upgrading or enhancing the transport network where there is a need to cope with additional passengers travelling to and from enlarged or growing airports.</p>
Safety and Security	5.15	<p>Our basic policy objective remains not to increase the number of people living, working or congregating in PSZs and, over time, to see the number reduced. Where necessary, we expect airport operators to offer to buy property which lies wholly or partly within those parts of the zones where the risk is greatest. We will continue to protect those living near airports by maintaining and, where justified, extending the PSZ system.</p>	<p>Public Safety Zones (PSZs) have been considered in the design of the Project and this is discussed in ES Appendix 5.3.4: Major Accidents and Disasters (Doc Ref. 5.3).</p> <p>The new standardised PSZs for the main runway are now shorter than the previous ones. Whilst the Project would lead to standardised PSZs being introduced for the northern runway, neither its current, nor reduced standardised PSZs for the main runway extend to affect development proposals in any significant way. The PSZ at the eastern end of the main runway cuts across long stay car parking (which is acceptable in PSZ policy terms). Pentagon Field at the eastern most tip of the main runway PSZ is no longer proposed for car parking. The ES (Doc Ref. 5.1) does not therefore include a PSZ assessment.</p>

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	31	Air transport is one of the safest forms of travel and the UK is a world leader in aviation safety. Maintaining and improving that record, while ensuring that regulation is proportionate and cost-effective, remains of primary importance to the UK. Since 2003, rules and standards for aviation safety in Europe have increasingly been set by the European Aviation Safety Agency (EASA). The UK will continue to work closely with EASA to ensure that a high and uniform level of civil aviation safety is maintained across Europe. In 2009, the UK was one of the first countries to publish a State Safety Programme, in line with new ICAO standards. The CAA published its own Safety Plan in 2011 outlining the additional action it will be taking to improve UK aviation safety performance.	The potential risks to safety in the event of a Major Accidents & Disasters (MA&D) during construction and operation of the Project across the study area have been assessed within ES Appendix 5.3.4: Major Accidents and Disasters (Doc Ref. 5.3).
	32	The threat to UK aviation remains high. To keep pace with the rapidly changing nature of the threat, the Government is seeking to move to an outcome-focused, risk-based regime for aviation security regulation in the future. To facilitate this the Government is working with industry to develop and roll out the implementation of Security Management Systems (SeMS), modelled on the safety management systems (SMS) approach already in widespread use by the aviation industry and its safety regulators. We believe this will provide even better aviation security by enabling more responsive and flexible approaches to new and emerging threats. In the future, it should also provide the industry with greater scope for innovation and efficiency in delivering security processes, potentially enabling security outcomes to be delivered in more passenger-friendly way.	Hazards that may pose a risk to the safety of sensitive receptors have been assessed and conclusions on the significance of the risk determined. The results of the assessment of hazards and significance of the risks are outlined in ES Chapter 18 (Doc Ref. 5.1). The discussion within this document confirms that appropriate aviation safety performance will be achieved in compliance with policy.
	5.8	The National Planning Policy Framework (NPPF) makes clear that local planning authorities should 'identify and protect, where there is robust evidence, sites and routes which could be critical in developing infrastructure to widen choice'. This could apply to airport infrastructure.	

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Community Engagement	20	Those who live closest to airports bear a particular burden of the costs, but also benefits, such as employment and convenient access to air travel. We therefore want to strengthen the arrangements for involving communities near airports in decisions which affect them. Chapter 4 focuses on the theme of working in partnership, particularly at a local level. It covers airport consultative committees (ACCs), airport master plans and airport transport forums (ATFs). Our objective is to encourage the aviation industry and local stakeholders to strengthen and streamline the way in which they work together.	Engagement on the Project has been carried out throughout the design process. This has included non-statutory and statutory consultation as described in ES Chapter 1 (Doc Ref. 5.1) and in Section 8.21 of the Planning Statement (Doc Ref. 7.1). The pre-application consultation undertaken is documented within the Consultation Report (Doc Ref. 6.1) submitted with the application. As a result, communities and planning decision-makers, including Local Authorities, have been able to give proper consideration to the impacts of the Project and these matters are considered policy compliant.
	4.3	Government's objective is to encourage the aviation industry and local stakeholders to strengthen and streamline the way in which they work together. Local stakeholders have the experience and expertise to identify solutions tailored to their specific circumstances. We therefore want to encourage good practice rather than propose a 'one size fits all' model for local engagement.	

Airports National Policy Statement			
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Principle of Development	4.4	In considering any proposed development, and in particular when weighing its adverse impacts against its benefits, the Examining Authority and the Secretary of State will take into account: <ul style="list-style-type: none"> • Its potential benefits, including the facilitation of economic development (including job creation) and environmental improvement, and any long term or wider benefits; and • Its potential adverse impacts (including any longer term and cumulative adverse impacts) as well as any measures to avoid, reduce or compensate for any adverse impacts. 	This matter is discussed in Section 8 and the benefits and adverse impacts of the Project are weighed in Section 9 of the Planning Statement (Doc Ref. 7.1), thereby demonstrating policy compliance.
	4.5	In this context, environmental, safety, social and economic benefits and adverse impacts should be considered at national, regional and local levels. These may be identified in the Airports NPS, or elsewhere. The Secretary of State will also have regard to the manner in which such benefits are secured, and the level of confidence in their delivery.	This matter is discussed in Section 9 of the Planning Statement (Doc Ref. 7.1). The benefits and adverse impacts of the Project have been considered at national, regional and local levels, thereby achieving policy compliance.
	4.7	Where the applicant's proposals in relation to surface access meet the thresholds to qualify as nationally significant infrastructure projects under the Planning Act 2008, or is associated development under section 115 of the Planning Act 2008, the Secretary of State will consider those aspects by reference to both the National Networks NPS and the Airports NPS, as appropriate. To the extent that discrete aspects of the surface access proposals do not qualify as nationally significant and cannot be included in a development consent application as associated development (for example), the applicant will be expected to pursue or secure necessary consent(s) through the most appropriate alternative consenting regime. This might include, for example, the Town and Country Planning Act 1990, the Highways Act 1980, or the Transport and Works Act 1992, promoted by a third party if need be.	This matter is addressed in Section 1.4 of ES Chapter 1 (Doc Ref. 5.1) where it is confirmed that the Project includes elements that constitute an airport NSIP and elements that constitute a highways NSIP in their own right.
	4.8	The Secretary of State will consider any relevant nationally significant road and rail elements of the applicant's proposals in accordance with	

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		the National Networks NPS and with the Airports NPS. If there is conflict between the Airports NPS and other NPSs, the conflict should be resolved in favour of the NPS that has been most recently designated. The Airports NPS and the National Networks NPS may also be a material consideration in decision making on applications for road and rail schemes associated with or related to the preferred scheme that fall under the Town and Country Planning Act 1990, the Transport and Works Act 1992, or other legislation relating to planning. Whether, and to what extent, the Airports NPS and the National Networks NPS are a material consideration will be judged on a case by case basis by the relevant decision makers.	
	4.16	In some instances it may not be possible at the time of the application for development consent for all aspects of the proposal to have been settled in precise detail. Where this is the case, the applicant should explain in its application which elements of the proposal have yet to be finalised, and the reasons why this is the case.	This is set out in the Design and Access Statement (Doc Ref. 7.3) and ES Chapter 6 (Doc Ref. 5.1).
Agriculture and Recreation	5.111	The applicant should identify existing and proposed land uses near the project, including any effects of replacing an existing development or use of the site with the proposed project or preventing a development or use on a neighbouring site from continuing. The applicant should also assess any effects of precluding a new development or use proposed in the development plan. The assessment should be proportionate to the scale of the preferred scheme and its likely impacts on such receptors.	The site and surroundings are documented in Section 2 of the Planning Statement (Doc Ref. 7.1), ES Chapter 4 (Doc Ref. 5.1) and the Design and Access Statement (Doc Ref. 7.3). The design of the Project is also set out and justified in full in the Design and Access Statement (Doc Ref. 7.3). The matter is considered policy compliant.
	5.112	Existing open space, sports and recreational buildings and land should not be developed unless the land is no longer needed or the loss would	This is addressed in Sections 19.8 and 19.9 of ES Chapter 19 (Doc Ref. 5.1)

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		be replaced by equivalent or better provision in terms of quantity and quality in a suitable location. If the applicant is considering proposals which would involve developing such land, it should have regard to any local authority's assessment of need for such types of land and buildings.	where the Replacement Open Space Proposals are justified. These proposals include a number of mitigation elements, such as the provision of public open space, provision of new and changes to existing public footpaths and management measures to maintain safe public access including a Public Rights of Way Management Strategy which forms ES Appendix 19.8.2 (Doc Ref. 5.3). Whilst the Project will result in the loss of 1.18 hectares of agricultural land, there will be no loss of best and most versatile land resource (Grades 1, 2 or 3a land). This loss would be replaced by 1.7 hectares of better public open space provision in terms of quality and quantity. Therefore, in respect of this matter, the Project is considered policy compliant.
	5.113	During any pre-application discussions with the applicant, the local planning authority should identify any concerns it has about the impacts of the application on land use, having regard to the development plan and relevant applications and including, where relevant, whether it agrees with any independent assessment that the land is no longer needed. These are also matters that local authorities may wish to include in their Local Impact Report which can be submitted after an application for development consent has been accepted.	The Host Authorities have been consulted at various stages of the development of the Project. The Consultation Report (Doc Ref. 6.1) covers this matter in greater depth and confirms the nature of any concerns raised. The Project therefore complies with the policy requirement.
	5.115	The applicant should take into account the economic and other benefits of best and most versatile agricultural land. Where significant	Detailed Agricultural Land Classification (ALC) surveys of agricultural land are

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		development of agricultural land is demonstrated to be necessary, the applicant should seek to use areas of poorer quality land in preference to that of a higher quality. The applicant should also identify any effects, and seek to minimise impacts, on soil quality, taking into account any mitigation measures proposed.	<p>described in Sections 19.6 and 19.11 of ES Chapter (Doc Ref. 5.1) and in ES Appendix 19.6.1: Published Agricultural Land Classification Data (Doc Ref. 5.3) and ES Appendix 19.6.2: Summary of Local Planning Policy – Agricultural Land Use and Recreation (Doc Ref. 5.3).</p> <p>The mitigation/ enhancement measures adopted as part of the Project are described in Section 19.8 of ES Chapter 19 (Doc Ref. 5.1). An assessment of the likely significant effects of the Project on agricultural land is made at Section 19.9 of ES Chapter 19 (Doc Ref. 5.1). These sections demonstrate how the requirement to seek to use areas of poorer quality land, and to minimise the impact on soil quality, has been considered, as per the policy requirement.</p>
	5.116	For developments where land may be affected by contamination, or existing mitigation is in place in respect of historic contamination, the applicant should have regard to the statutory regime contained in Part IIA of the Environmental Protection Act 1990 and relevant Government guidance relating to or dealing with contaminated land.	A set of land contamination assessments for human health and controlled waters provided as ES Appendix 10.9.1: Preliminary Risk Assessment (Doc Ref. 5.3) and ES Appendix 10.9.2: Mineral Resource Assessment (Doc Ref. 5.3) have been undertaken for the Project in

Airports National Policy Statement			
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			accordance with the required statutory guidance and best practice. A summary of the findings is presented in Section 10.6 of ES Chapter 10 (Doc Ref. 5.1) whilst mitigation measures are set out in Section 10.8 of ES Chapter 10 (Doc Ref. 5.1) and the effects of the Project are assessed within Section 10.9 of ES Chapter 10 (Doc Ref. 5.1).
	5.117	The applicant should safeguard any mineral resources on the proposed site for the preferred scheme as far as possible.	This is addressed in Section 10.9 of ES Chapter 10 (Doc Ref. 5.1). Preliminary enquiries have been made with third party mineral users regarding opportunities to use the material excavated from the Brick Clay Resource Mineral Safeguarded Area. This will be taken forward within the Materials Management Plan which forms a part of the Construction Code of Practice (CoCP) forming ES Appendix 5.3.2 (Doc Ref. 5.3).
	5.118	The applicant can minimise the direct effects of a project on the existing use of the proposed site, or proposed uses near the site, by the application of good design principles, including the layout of the project and the protection of soils during construction.	The sustainable use of soil as part of the Project is set out in summary in Section 19.9 of ES Chapter 19 (Doc Ref. 5.1) and in detail in ES Appendix 5.3.2: Code of Construction Practice Annex 4 – Soil Management Strategy (Doc Ref. 5.3) and is considered to be policy compliant.

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	5.119	Where green infrastructure is affected, the applicant should aim to ensure the functionality and connectivity of the green infrastructure network is maintained and any necessary works are undertaken, where possible, to mitigate any adverse impact and, where appropriate, to improve that network and other areas of open space, including appropriate access to National Trails and other public rights of way.	The mitigation measures set out in Section 19.8 of ES Chapter 19 ES (Doc Ref. 5.1), as well as the details of impacts on Public Rights of Way as set out in ES Appendix 19.8.2: Public Rights of Way Management Strategy (Doc Ref. 5.3) describe the beneficial effects of proposals to achieve a functional and well connected green infrastructure network.
	5.120	The Secretary of State must also consider whether mitigation of any adverse effects on green infrastructure or open space is adequately provided for by means of requirements, planning obligations, or any other means, for example to provide exchange land and provide for appropriate management and maintenance agreements. Any exchange land should be at least as good in terms of size, usefulness, attractiveness, quality and accessibility. Alternatively, where sections 131 and 132 of the Planning Act 2008 apply, any replacement land provided under those sections will need to conform to the requirements of those sections.	This is addressed in Sections 19.8 and 19.9 of ES Chapter 19 (Doc Ref. 5.1) where the Replacement Open Space proposals are justified. These proposals include a number of mitigation elements, such as the provision of public open space, provision of new and changes to existing public footpaths and management measures to maintain safe public access including a Public Rights of Way Management Strategy which forms ES Appendix 19.8.2 (Doc Ref. 5.3). Whilst the Project will result in the loss of 1.18 hectares of agricultural land, there will be no loss of best and most versatile land resource (Grades 1, 2 or 3a land). This loss would be replaced by 1.7 hectares of better public open space provision in terms of quality and quantity. Therefore, in respect of

Airports National Policy Statement			
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			this matter the Project is considered policy compliant.
	5.121	Where the preferred scheme has an impact on a mineral safeguarding area, the Secretary of State must ensure that the applicant has put forward appropriate mitigation measures to safeguard mineral resources.	This is addressed in Section 10.9 of ES Chapter 10 (Doc Ref. 5.1). Preliminary enquiries have been made with third party mineral users regarding opportunities to use the material excavated from the Brick Clay Resource Mineral Safeguarded Area. This will be taken forward within the Materials Management Plan which forms a part of the Construction Code of Practice (CoCP) forming ES Appendix 5.3.2 (Doc Ref. 5.3).
	5.122	Where a project has a sterilising effect on land use, there may be scope for this to be mitigated through, for example, using the land for nature conservation or wildlife corridors.	The Replacement Open Space proposals are justified in Sections 19.8 and 19.9 of ES Chapter 19 (Doc Ref. 5.1). Section 9.8 of ES Chapter 9 (Doc Ref. 5.1) sets out that parts of mitigation areas would be managed to provide suitable wildlife habitat. Therefore, this matter is considered policy compliant.
	5.123	Public rights of way, National Trails and other rights of access to land are important recreational facilities for walkers, cyclists and equestrians. The applicant is expected to take appropriate mitigation measures to address adverse effects on National Trails, other public rights of way	These are detailed in Section 19.8 of ES Chapter 19 (Doc Ref. 5.1).

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		and open access land and, where appropriate, to consider what opportunities there may be to improve access. In considering revisions to an existing right of way, consideration needs to be given to the use, character, attractiveness and convenience of the right of way. The Secretary of State should consider whether the mitigation measures put forward by an applicant are acceptable and whether requirements or other provisions in respect of these measures might be attached to any grant of development consent.	This is addressed in Sections 19.8 and 19.9 of ES Chapter 19 (Doc Ref. 5.1) where the Replacement Open Space proposals are justified. These proposals include a number of mitigation elements, including the provision of new public footpaths and changes to existing public footpaths and management measures to maintain safe public access including a Public Rights of Way Management Strategy forming ES Appendix 19.8.2 (Doc Ref. 5.3). Therefore, this matter is considered policy compliant.
	5.124	The Secretary of State should not grant consent for development on existing open space, sports and recreational buildings and land, including playing fields, unless an assessment has been undertaken either by the local authority or independently, which has shown the open space or the buildings and land to be no longer needed, or the Secretary of State determines that the benefits of the project (including need) outweigh the potential loss of such facilities, taking into account any positive proposals made by the applicant to provide new, improved or compensatory land or facilities.	Impact on open and recreational spaces, including the loss of some open space, is addressed in Sections 19.8 and 19.9 of ES Chapter 19 (Doc Ref. 5.1). These adverse impacts, among others, are weighed against the planning benefits of the Project in Section 9 of the Planning Statement (Doc Ref. 7.1).
	5.125	Where networks of green infrastructure have been identified in development plans, they should normally be protected from development and, where, possible, strengthened by or integrated within it. The Secretary of State will also have regard to the effect of the development upon and resulting from existing land contamination, as well as the mitigation proposed.	The mitigation measures to protect green infrastructure networks are detailed in Section 19.8 of ES Chapter 19 (Doc Ref. 5.1), where the Replacement Open Space proposals are set out. These proposals include the

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			<p>provision of new public footpaths and changes to existing public footpaths and management measures to maintain safe public access including a Public Rights of Way Management Strategy forming ES Appendix 19.8.2 (Doc Ref. 5.3). Therefore, the Project is considered policy compliant.</p>
	5.126	<p>The Secretary of State will take into account the economic and other benefits of the best and most versatile agricultural land, and ensure the applicant has put forward appropriate mitigation measures to minimise impacts on soils or soil resources.</p>	<p>This matter is addressed in Section 19.8 of ES Chapter 19 (Doc Ref. 5.1). Detailed Agricultural Land Classification (ALC) surveys of agricultural land are described in Sections 19.6 and 19.11 of ES Chapter 19 (Doc Ref. 5.1) and in ES Appendix 19.6.1: Published Agricultural Land Classification Data (Doc Ref. 5.3) and ES Appendix 19.6.2: Summary of Local Planning Policy – Agricultural Land Use and Recreation (Doc Ref. 5.3).</p> <p>The mitigation/enhancement measures adopted as part of the Project are described in Section 19.8 of ES Chapter 19 (Doc Ref. 5.1). An assessment of the likely significant effects of the Project on agricultural land is set out at Section 19.9 of ES Chapter 19 (Doc Ref 5.1). These sections of the ES (Doc Ref 5.1)</p>

Airports National Policy Statement			
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			demonstrate how the requirement to seek to use areas of poorer quality land, and to minimise the impact on soil quality, has been considered, as required by the policy.
Air Quality	4.70	The construction and use of airports infrastructure has the potential to affect people's health, wellbeing and quality of life. Infrastructure can have direct impacts on health because of traffic, noise, vibration, air quality and emissions, light pollution, community severance, dust, odour, polluting water, hazardous waste and pests.	Negative health impacts have been identified and mitigated against as detailed and assessed in Sections 18.7 and 18.8 of ES Chapter 18 (Doc Ref. 5.1). The mitigation measures include health service provision for the workforce and airport visitors and passengers, as well as the establishment of an Employment, Skills and Business Strategy at ES Appendix 17.8.1 (Doc Ref. 5.3) which sets out measures to enable the local workforce to attain skills relevant to employment opportunities arising from airport growth and which will ensure that the local area benefits from new employment opportunities.
	4.71	New or enhanced airports infrastructure may also have indirect health impacts, for example if they affect access to key public services, local transport, opportunities for cycling and walking, or the use of open space for recreation and physical activity. It should also be noted, however, that the increased employment stemming from airport expansion may have indirect positive health impacts.	
	4.72	As described elsewhere in the Airports NPS, where the proposed project has likely significant environmental impacts that would have an effect on human beings, any environmental statement should identify and set out the assessment of any likely significant health impacts.	
	4.73	The applicant should identify measures to avoid, reduce or compensate for adverse health impacts as appropriate. These impacts may affect people simultaneously, so the applicant, the Examining Authority and the Secretary of State (in determining an application for development consent) should consider the cumulative impact on health.	
	5.33	The environmental statement should assess: <ul style="list-style-type: none"> Existing air quality levels for all relevant pollutants referred to in the Air Quality Standards Regulations 2010 and the National Emission Ceilings Regulations 2002 (as amended) or referred to in any successor regulations; 	
			Details of the air quality baseline are set out at Section 13.7 of ES Chapter 13 (Doc Ref. 5.1). This section includes forecasting of all relevant air quality

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		<ul style="list-style-type: none"> • Forecasts of levels for all relevant air quality pollutants at the time of opening, (a) assuming that the scheme is not built (the 'future baseline'), and (b) taking account of the impact of the scheme, including when at full capacity; and • Any likely significant air quality effects of the scheme, their mitigation and any residual likely significant effects, distinguishing between those applicable to the construction and operation of the scheme including any interaction between construction and operational changes and taking account of the impact that the scheme is likely to cause on air quality arising from road and other surface access traffic. 	<p>pollutants at the time of opening, with and without the Project in operation. The impacts are summarised in Section 13.10 of ES Chapter 13 (Doc Ref. 5.1). The assessment determines the significance of effects from all Project related activities (both construction and operation) and concludes that no significant air quality effects are predicted as a result of the Project. See ES Appendix 13.4.1: Air Quality Assessment Methodology (Doc Ref. 5.3) for the methodology. A summary of impacts has been provided in Section 13.10 of ES Chapter 13 (Doc Ref. 5.1). The Project is compliant with the policy.</p>
	5.34	Defra publishes future national projections of air quality based on evidence of future emissions. Projections may be updated as the evidence base changes. The applicant's assessment should, in so far as practicable, be based on the latest available projections.	Relevant and recent data from Defra has been used for the assessment of air quality impacts arising from the Project. This can be found in Section 13.10 of Chapter 13 of the ES (Doc Ref. 5.1).
	5.35	The Secretary of State will need to be satisfied that the mitigation measures put forward by the applicant are acceptable, including at the construction stage. A management / project plan may help record and secure mitigation measures.	The range of mitigation measures in place to address the impact to air quality as a result of the Project are found in Section 13.9 of ES Chapter 13 (Doc Ref. 5.1).
	5.36	Mitigation measures may affect the project design, layout, construction and operation, and / or may comprise measures to improve air quality in pollution hotspots beyond the immediate locality of the scheme.	Additionally, further mitigation and good practice measures during the construction and operational assessment phases of the Project are
	5.37	While the precise package of mitigations should be subject to consultation with local communities and relevant stakeholders to ensure	

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		the most effective measures are taken forward, an extensive range of mitigation measures is likely to be required.	<p>set out in the Code of Construction Practice (CoCP) provided as ES Appendix 5.3.2 (Doc Ref. 5.3) and in the Air Quality Construction Period Mitigation provided as ES Appendix 13.8.1 (Doc Ref. 5.3).</p> <p>The Mitigation Route Map comprising ES Appendix 5.2.3 (Doc Ref. 5.3) and Section 13.9 of ES Chapter 13 (Doc Ref. 5.1) identify all the mitigation measures proposed and sets out how they will be secured. The measures include, among others, the use of low or zero emissions construction equipment and vehicles and a commitment by GAL to decarbonisation outcomes through its Carbon Action Plan comprising ES Appendix 5.4.2 (Doc Ref. 5.3).</p>
	5.39	<p>Other mitigation measures which may be put forward by the applicant could include, but are not limited to:</p> <ul style="list-style-type: none"> • Landing charges structured to reward airlines for operating cleaner flights (for example NOx emissions charging); • Zero- or low-emission hybrid or electric vehicle use (ultra-low emission vehicles), charging and fuel facilities; • Reduced or single engine taxiing (improved taxiing efficiency); • Reducing emissions from aircraft at the gate (for example installation of fixed electrical ground power and preconditioned air to aircraft stands to reduce the use of auxiliary power unit); • Modernised heating supplies in airport buildings; • Changes to the layout of surface access arrangements; • Traffic restrictions and / or traffic relocation around sensitive areas; • An emissions-based access charge; and • Physical means, including barriers to trap or better disperse emissions and speed control on roads. 	
	5.40	<p>Mitigation measures at the construction stage should also be provided and draw on best practice from other major construction schemes, including during the procurement of contractors. Specific measures could include but are not limited to:</p> <ul style="list-style-type: none"> • Development of a construction traffic management plan (which may include the possible use of rail and consolidation sites or waterways); • The use of low emission construction plant / fleet, fitting of diesel particulate filters, and use of cleaner engines; • The use of freight consolidation sites; • Active workforce management / a worker transport scheme; • Construction site connection to grid electricity to avoid use of mobile generation; and 	

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		<ul style="list-style-type: none"> • Selection of construction material to minimise distance of transport and increase recycling percentages of the material where appropriate. 	
	5.41	The implementation of mitigation measures may require working with partners to support their delivery.	
	5.42	The Secretary of State will consider air quality impacts over the wider area likely to be affected, as well as in the vicinity of the scheme. In order to grant development consent, the Secretary of State will need to be satisfied that, with mitigation, the scheme would be compliant with legal obligations that provide for the protection of human health and the environment.	<p>A summary of impacts (including all areas which are likely to be relevant to the Secretary of State's decision-making) is provided in Section 13.10 of ES Chapter 13 (Doc Ref. 5.1). It is concluded that no significant air quality effects are predicted as a result of the Project. These matters are therefore considered policy compliant.</p>
	5.43	<p>Air quality considerations are likely to be particularly relevant where the proposed scheme:</p> <ul style="list-style-type: none"> • is within or adjacent to Air Quality Management Areas, 145 roads identified as being above limit values, or nature conservation sites (including Natura 2000 sites and Sites of Special Scientific Interest); • would have effects sufficient to bring about the need for new Air Quality Management Areas or change the size of an existing Air Quality Management Area, or bring about changes to exceedances of the limit values, or have the potential to have an impact on nature conservation sites; and • after taking into account mitigation, would lead to a significant air quality impact in relation to Environmental Impact Assessment and / or to a deterioration in air quality in a zone or agglomeration. 	
	5.233	Where the development is subject to an Environmental Impact Assessment, the applicant should assess any likely significant effects on amenity from emissions of dust, odour, artificial light, smoke and steam, and describe these in the environmental statement.	
	5.234	<p>In particular, the assessment provided by the applicant should describe:</p> <ul style="list-style-type: none"> • The type and quantity of emissions; 	<p>Amenity value has been built into various chapters, including ES Chapter 8: Landscape, Townscape and Visual Resources, ES Chapter 9: Ecology and Nature Conservation, ES Chapter 12: Traffic and Transport, ES Chapter</p>

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		<ul style="list-style-type: none"> • Aspects of the development which may give rise to emissions during construction, operation and decommissioning; • Premises or locations that may be affected by the emissions; • Effects of the emission on identified premises or locations; and • Measures to be employed in preventing or mitigating the emissions. 	<p>13: Air Quality, ES Chapter 14: Noise and Vibration and ES Chapter 18: Health and Wellbeing (Doc Ref. 5.1).</p> <p>Mitigation measures to minimise dust, emissions, noise have been embedded into the design and detailed in ES Chapter 12: Traffic and Transport, ES Chapter 13: Air Quality and ES Chapter 14: Noise and Vibration (Doc Ref. 5.1), demonstrating compliance with the policy.</p>
	5.235	The applicant is advised to consult the relevant local planning authority and, where appropriate, the Environment Agency, about the scope and methodology of the assessment.	
Ecology and Nature Conservation	5.89	The applicant should ensure that the environmental statement submitted with its application for development consent clearly sets out any likely significant effects on internationally, nationally and locally designated sites of ecological or geological importance, protected species, and habitats and other species identified as being of principal importance for the conservation of biodiversity.	<p>The likely significant effects of the Project upon designated nature conservation sites are detailed within Section 9.9 of ES Chapter 9 (Doc Ref. 5.1).</p> <p>The assessment reflects the principles of Biodiversity 2020: A Strategy for England's Wildlife and Ecosystem Services in identifying how climate change is likely to affect the future environment and this is detailed in Section 9.10 of ES Chapter 9 (Doc Ref. 5.1).</p> <p>The Project's embedded and good practice mitigation measures are detailed in Section 9.8 of ES Chapter 9 (Doc Ref. 5.1). The Project is compliant with the policy.</p>
	5.90	The Environmental Impact Assessment should reflect the principles of Biodiversity 2020 and identify how the effects on the natural environment will be influenced by climate change, and how ecological networks and their physical and biological process will be maintained.	
	5.91	The applicant should show how the project has taken advantage of and maximised opportunities to conserve biodiversity and geological conservation interests.	

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	5.92	The Secretary of State will consider what requirements should be attached to any consent and / or in any planning obligations entered into in order to ensure that mitigation measures are delivered and monitored for their effectiveness.	<p>The measures detailed within Section 9.8 of ES Chapter 9 (Doc Ref. 5.1) have been designed to ensure that the impacts of the Project on ecological receptors are avoided, reduced or mitigated where effects are unavoidable and that the Project has been designed to achieve BNG. The BNG proposals are set out within ES Appendix 9.9.2: Biodiversity Net Gain Statement (Doc Ref. 5.3).</p> <p>Detailed Ecological Mitigation strategies in relation to bats and badgers are set out in ES Appendix 9.6.3: Bat Trapping and Radio Tracking Surveys (Doc Ref 5.3) and ES Appendix 9.6.4: Confidential Badger Survey (Doc Ref. 5.3). The Project complies with the policy requirement.</p> <p>Section 9.9 of ES Chapter 9 (Doc Ref. 5.1) provides an assessment of the potential effects that the Project will have on designated nature conservation sites, habitats and species as per the policies listed within the Plan. These effects are summarised in Section 9.13 of ES Chapter 9.</p> <p>In addition to the mitigation measures set out in Section 9.8 of ES Chapter 9 (Doc Ref. 5.1), further such measures</p>
	5.93	The Secretary of State will take account of any mitigation measures agreed between the applicant and Natural England, and whether Natural England has granted or refused, or intends to grant or refuse, any relevant licences, including protected species mitigation licences.	
	5.94	The applicant's proposal should address the mitigation hierarchy (which supports efforts to conserve and enhance biodiversity), which is set out in the National Planning Policy Framework	
	5.95	Compensation ratios relating to the effects of the preferred scheme should be considered in more detail during the design. The application of 2:1 compensation ratio is considered to represent the minimum requirement. However, there are other mechanisms for establishing compensation ratios, such as Defra's biodiversity offsetting metric. Equally, it is important to note that habitat ratios form only one part of potential compensation which should be considered, and the location and quality of any compensation land is of key importance. In this regard, habitat creation, where required, should be focused on areas where the most ecological and ecosystems services benefits can be realised.	

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	5.96	As a general principle, and subject to the specific policies set out below and the Infrastructure Planning (Decisions) Regulations 2010, development should avoid significant harm to biodiversity and geological conservation interests, including through mitigation and consideration of reasonable alternatives. The applicant may also wish to make use of biodiversity offsetting in devising compensation proposals to counteract any impacts on biodiversity which cannot be avoided or mitigated. Where significant harm cannot be avoided or mitigated, as a last resort appropriate compensation measures should be sought. The development consent order, or any associated planning obligations, will need to make provision for the long term management of such measures.	<p>are outlined within the Outline Landscape and Ecology Management Plan (LEMP) which comprises ES Appendix 8.8.1 (Doc Ref 5.3). Mitigation measures described in this chapter and adopted as part of the Project include measures to protect and minimise the potential for effects on biodiversity including habitat creation around the Project site, which would contribute to the overall effect in relation to biodiversity.</p> <p>Biodiversity Net Gain calculations are provided in the Biodiversity Net Gain Statement comprising ES Appendix 9.9.2 (Doc Ref. 5.3). Overall, the Project has been assessed as being in accordance with relevant policies for ecology and nature conservation including biodiversity.</p>
	5.97	In taking decisions, the Secretary of State will ensure that appropriate weight is attached to designated sites of international, national and local importance, protected species, habitats and other species of principal importance for the conservation of biodiversity, and to biodiversity and geological interests within the wider environment.	
	5.98	<p>The most important sites for biodiversity are those identified through international conventions and European Directives. The Habitats Regulations provide statutory protection for European sites and require an assessment of impacts upon such sites. The Government considers that the following wildlife sites should have the same protection as European sites:</p> <ul style="list-style-type: none"> • Potential Special Protection Areas and possible Special Areas of Conservation; • Listed or proposed Ramsar sites;175 and • Sites identified or required as compensatory measures for adverse effects on European sites, potential Special Protection Areas, possible Special Areas of Conservation, and listed or proposed Ramsar sites. 	

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	5.100	Many Sites of Special Scientific Interest are also designated as sites of international importance and will be protected accordingly. Those that are not, or those features of Sites of Special Scientific Interest that are not covered by an international designation, will be given a high degree of protection. All National Nature Reserves are notified as Sites of Special Scientific Interest.	
	5.101	Where a proposed development on land within or outside a Site of Special Scientific Interest is likely to have an adverse effect on the site (either individually or in combination with other developments), development consent should not normally be granted. Where an adverse effect on the site's notified special interest features is likely, an exception should be made only where the benefits of the development at this site clearly outweigh both the impacts that it is likely to have on the features of the site that make it of special scientific interest, and any broader impacts on the national network of Sites of Special Scientific Interest. The Secretary of State will ensure that the applicant's proposals to mitigate the harmful aspects of the development and, where possible, to ensure the conservation and enhancement of the site's biodiversity or geological interest, are acceptable. Where necessary, requirements and / or planning obligations should be used to ensure these proposals are delivered.	
	5.102	Sites of regional and local biodiversity interest (which include Local Nature Reserves, Local Wildlife Sites and Nature Improvement Areas) have a fundamental role to play in meeting overall national biodiversity targets, contributing to the quality of life and the wellbeing of the community, and supporting research and education. The Secretary of State will give due consideration to such regional or local designations. However, given the need for new infrastructure, these designations should not be used in themselves to refuse development consent, although adequate compensation should always be considered, and	

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		ecological corridors and their physical processes should be maintained as a priority to mitigate widespread impacts.	
	5.103	Ancient woodland is a valuable biodiversity resource both for its diversity of species and for its longevity as woodland. Once lost, it cannot be recreated. The Secretary of State should not grant development consent for any development that would result in the loss or deterioration of irreplaceable habitats including ancient woodland and the loss of aged or veteran trees found outside ancient woodland, unless the national need for and benefits of the development, in that location, clearly outweigh the loss. Aged or veteran trees found outside ancient woodland are also particularly valuable for biodiversity and their loss should be avoided. Where such trees would be affected by development proposals, the applicant should set out proposals for their conservation or, where their loss is unavoidable, the reasons for this.	
	5.104	The proposed development comprised in the preferred scheme should provide many opportunities for building in beneficial biodiversity as part of good design. When considering proposals, the Secretary of State will consider whether the applicant has maximised such opportunities in and around developments, and particularly to establishing and enhancing green infrastructure. The Secretary of State may use requirements or planning obligations where appropriate in order to ensure that such beneficial features are delivered.	
	5.105	In addition to the habitats and species that are subject to statutory protection or international, regional or local designation, other habitats and species have been identified as being of principal importance for the conservation of biodiversity in England and Wales and therefore requiring conservation action. The Secretary of State will ensure that the applicant has taken measures to ensure that these other habitats and species are protected from the adverse effects of development. Where appropriate, requirements or planning obligations may be used	This matter is discussed in Section 8 and weighed in Section 9 of the Planning Statement (Doc Ref. 7.1). An assessment of the effects has been conducted in compliance with the requirements of the Airports National Policy Statement and that the Project has taken into account the need to

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		in order to deliver this protection. The Secretary of State will refuse consent where harm to these other habitats, or species and their habitats, would result, unless the benefits of the development (including need) clearly outweigh that harm. In such cases, compensation will generally be expected to be included in the design proposals.	<p>protect biodiversity and prevent significant harm, such as through avoiding areas of high biodiversity value. This has included changes to the Project boundary to avoid areas of high biodiversity value.</p> <p>Mitigation measures adopted as part of the Project include measures to protect and minimise the potential for effects on biodiversity including habitat creation around the Project site, which would contribute to the overall effect in relation to biodiversity. Details of compensation measures are provided where they are required as a last resort, such as the provision of alternative habitat to compensate for habitat losses for bats, great crested newts and reptiles.</p>
Climate Change and Greenhouse Gases	4.45	New airports infrastructure will typically be a long-term investment which will need to remain operational over many decades, in the face of a changing climate. Consequently, the applicant must consider the impacts of climate change when planning design, build and operation. Any accompanying environmental statement should set out how the proposal will take account of the projected impacts of climate change.	The impacts of climate change on the Project are considered within the ES (Doc Ref. 5.1) and have been through the sifting and optioneering planning stages as presented in ES Chapter 3 (Doc Ref. 5.1). The Climate Change Resilience assessment is provided within Section 15.8 of ES Chapter 15 (Doc Ref. 5.1) which covers design, build (construction) and operation and identifies mitigation measures to ensure

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			Climate Change resilience including design principles that account for extreme temperature events and water stress, in accordance with the policy requirement.
	4.46	Detailed consideration must be given to the range of potential impacts of climate change using the latest UK Climate Projections available at the time, and to ensuring any environmental statement that is prepared identifies appropriate mitigation or adaptation measures. This should cover the estimated lifetime of the new infrastructure. Should a new set of UK Climate Projections become available after the preparation of any environmental statement, the Examining Authority should consider whether it needs to request additional information from the applicant.	Consistent with the policy requirement, the assessment methodology outlined in ES Chapter 15 (Doc Ref. 5.1) includes identification of climate change impacts including UKCP18 (the latest set of UK climate projections) reflecting a number of time periods, covering the lifetime of the Project, as described in Section 15.5 of ES Chapter 15 (Doc Ref. 5.1). Section 15.8 of ES Chapter 15 (Doc Ref. 5.1) sets out how embedded environmental measures will be implemented in relation to climate change.
	4.47	Where transport infrastructure has safety-critical elements, and the design life of the asset is 60 years or greater, the applicant should apply the latest available UK Climate Projections, considering at least a scenario that reflects a high level of greenhouse gas emissions at the 10%, 50% and 90% probability levels, to assess the impacts of climate change over the lifetime of the development.	The assessment in Section 15.9 of ES Chapter 15 (Doc Ref. 5.1) has considered various scenarios for Greenhouse Gas (GHG) emissions to assess the impact of climate change over the lifetime of the Project. For this reason, Representative Concentration Pathways (RCP), as described in Section 15.2 of ES Chapter 15 (Doc Ref. 5.1) has been used. RCP 8.5 is the highest emissions scenario available on

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			UKCP18, representing a global temperature increase of approximately 4.3 degrees Celsius by 2100, relative to pre-industrial temperatures. The Project has therefore been assessed in accordance with the policy requirement.
	4.48	The applicant should demonstrate that there are no critical features of infrastructure design which may be seriously affected by more radical changes to the climate beyond those projected in the latest set of UK Climate Projections. Any potential critical features should be assessed, taking account of the latest credible scientific evidence on, for example, sea level rise, and on the basis that necessary action can be taken to ensure the operation of the infrastructure over its estimated lifetime through potential further mitigation or adaptation.	In line with the ANPS, more radical changes to the climate beyond those projected in the latest set of UKCP18 have been considered and outlined in Section 15.5 of ES Chapter 15 (Doc Ref. 5.1) using plausible higher and lower end climate change projections from both the H++/L—scenarios, and the UKCP18 probabilistic projections of climate extremes. With the limitations and uncertainties of the data available on future climate change projections as outlined in Section 15.6 of ES Chapter 15 (Doc Ref. 5.1), critical features of infrastructure have been assessed accordingly, consistent with the policy requirement.
	4.49	Any adaptation measures should be based on the latest set of UK Climate Projections, the most recent UK Climate Change Risk Assessment, consultation with statutory consultation bodies, and any other appropriate climate projection data. Any adaptation measures must themselves also be assessed as part of any Environmental Impact	Consideration of the UK Climate Change Risk Assessment in the methodology is described in Section 15.5 of ES Chapter 15 (Doc Ref. 5.1). Section 15.3 of ES Chapter 15 (Doc Ref. 5.1) sets out the responses to

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		Assessment and included in the environmental statement, which should set out how and where such measures are proposed to be secured.	comments received from the Planning Inspectorate via the Scoping Opinion which forms ES Appendix 6.2.2 (Doc Ref. 5.3) as well as engagement with statutory consultation bodies and other key stakeholders. Mitigation measures have been developed to manage risks and these are described in Section 15.8 of ES Chapter 15 (Doc Ref. 5.1). The Project accords with the policy requirement.
	4.50	If any proposed adaptation measures themselves give rise to consequential impacts, the Secretary of State will consider the impact in relation to the application as a whole and the assessment principles set out in the Airports NPS.	The consequential impacts of embedded mitigation for other environmental aspects (e.g. on health and wellbeing) have been assessed in individual topic chapters within the ES (Doc Ref. 5.1). Mitigation identified for climate change has been recorded in Table 15.8.4 and Table 15.9.1 within ES Chapter 15 (Doc Ref. 5.1) for the CCR Assessment and for the ICCI Assessment, respectively.
	4.51	Adaptation measures can be required to be implemented at the time of construction where necessary and appropriate to do so.	Elements of the design have been developed to account for climate change adaption and would be implemented at the time of construction. These are captured within the Design and Access Statement (Doc Ref. 7.3) as Outline Climate Resilience Design Principles and measures.

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	4.52	Where adaptation measures are necessary to deal with the impact of climate change, and that measure would have an adverse effect on other aspects of the project or the surrounding environment, the Secretary of State may consider requiring the applicant to ensure that the adaptation measure could be implemented should the need arise, rather than at the outset of the development.	Several mitigation measures are already embedded within the design of the Project. Further mitigation measures are necessary for four key areas (overheating in buildings during construction, dealing with extreme events during construction, overheating in buildings during operation and water stress during operation). These are identified within the Design and Access Statement (Doc Ref. 7.3). Should other climate risks become significant in the future, the Climate Change Resilience Assessment which forms ES Appendix 15.8.1 (Doc Ref. 5.3) suggests additional mitigation should the need arise.
	5.76	Pursuant to the terms of the Environmental Impact Assessment Regulations, 164 the applicant should undertake an assessment of the project as part of the environmental statement, to include an assessment of any likely significant climate factors. The applicant should provide evidence of the carbon impact of the project (including embodied carbon), both from construction and operation, such that it can be assessed against the Government's carbon obligations, including but not limited to carbon budgets. The applicant should quantify the greenhouse gas impacts before and after mitigation to show the impacts of the proposed mitigation. This will require emissions to be split into traded sector and non-traded sector emissions, and for a distinction to be made between international and domestic aviation emissions.	The construction and operational Greenhouse Gas (GHG) impact of the Project is set out in Section 16.9 of ES Chapter 16 (Doc Ref. 5.1). This section also includes an assessment of the impact of the Project against the Government's carbon obligations in accordance with the policy requirement.

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	5.77	<p>As far as possible, the applicant's assessment should also seek to quantify impacts including:</p> <ul style="list-style-type: none"> • Emissions from surface access due to airport and construction staff; • Emissions from surface access due to freight and retail operations and construction site traffic. • Emissions from surface access due to airport passengers / visitors; and • Emissions from airport operations including energy and fuel use. <p>This should be undertaken in both a 'do minimum' and also in the 'do something' scenario for the opening, peak operation, and worst case scenarios.</p>	<p>GHG emissions impacts for each of the required emissions sources are presented in Section 16.9 of ES Chapter 16 (Doc Ref. 5.1).</p>
	5.78	<p>The Secretary of State will need to be satisfied that the mitigation measures put forward by the applicant are acceptable, including at the construction stage. A management / project plan may help clarify and secure mitigation at this stage. The applicant is expected to take measures to limit the carbon impact of the project, which may include, but are not limited to:</p> <ul style="list-style-type: none"> • Zero or low-emission hybrid or electric vehicle use (ultra-low emission vehicles), charging and fuel facilities; • Reduced engine taxiing (improved taxiing efficiency); • Reducing emissions from aircraft at the gate; • Reduced emissions from airport buildings (for example from lower carbon heating); • Changes to the layout of surface access arrangements; and • Encouraging increased use of public transport by staff and passengers. 	<p>Mitigation measures suggested in the policy have been considered in the embedded and additional measures to mitigate GHG emissions from the construction and operation of the Project and these are presented in Section 16.8 and Section 16.10 of ES Chapter 16 (Doc Ref. 5.1). These measures comprise commitments to achieving specific levels of lower emission transport modes for passengers and staff accessing the airport and to a carbon budget for construction, surface access and aviation processes. These commitments have been collated into the Carbon Action Plan and the Surface Access Commitments, respectively comprising</p>

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			ES Appendix 5.4.2 (Doc Ref 5.3) and ES Appendix 5.4.1 (Doc Ref. 5.3).
	5.82	Any increase in carbon emissions alone is not a reason to refuse development consent, unless the increase in carbon emissions resulting from the project is so significant that it would have a material impact on the ability of Government to meet its carbon reduction targets, including carbon budgets.	Mitigation measures suggested by policy have been considered in the embedded and additional measures to mitigate GHG emissions from the construction and operation of the Project and these are presented in Section 16.8 and Section 16.10 of ES Chapter 16 (Doc Ref. 5.1).
	5.83	Evidence of appropriate mitigation measures (incorporating engineering plans on configuration and layout, and use of materials) in both design and construction should be presented as part of any application for development consent. The Secretary of State will consider the effectiveness of such mitigation measures in order to ensure that, in relation to design and construction, the carbon footprint is not unnecessarily high. The Secretary of State's view of the adequacy of the mitigation measures relating to design, construction and operational phases will be a material factor in the decision making process.	Section 16.9 of ES Chapter 16 (Doc Ref. 5.1) assesses the significance of the effect on GHG emissions and Sections 16.9 and 16.12 of ES Chapter 16 (Doc Ref. 5.1) addresses the NPS requirement to assess whether the Project has a material impact on the UK Government's ability to meet its carbon reduction targets including the CCC's Carbon Budgets. It is concluded that the overall impacts arising from the Project are not so significant that the Project would have a material impact on the ability of Government to meet its carbon reduction targets, including Carbon Budgets.
Historic Environment	5.193	As part of the environmental statement, the applicant should provide a description of the significance of the heritage assets affected by the proposed development, and the contribution of their setting to that	The description of the significance of the assets affected by the Project, and the contribution of their setting to that

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		<p>significance. The level of detail should be proportionate to the asset's importance, and no more than is sufficient to understand the potential impact of the proposal on the significance of the asset. Consideration will also need to be given to the possible impacts, including cumulative, on the wider historic environment. At a minimum, the relevant Historic Environment Record should be consulted and the heritage assets assessed using appropriate expertise. Where a site on which development is proposed includes or has the potential to include heritage assets with archaeological interest, the applicant should include an appropriate desk-based assessment and, where necessary, a field evaluation. The applicant should ensure that the extent of the impact of the proposed development on the significance of any heritage asset affected can be adequately understood from the application and supporting documents.</p>	<p>significance, is summarised within Section 7.6 of ES Chapter 7 (Doc Ref. 5.1) and presented within an appropriate desk-based assessment and a summary of the results of field evaluations form part of the Historic Environment Baseline Report comprising ES Appendix 7.6.1 (Doc Ref. 5.3). The same Appendix also includes a list of data sources consulted to inform the cultural heritage baseline conditions.</p> <p>Cumulative effects are discussed in ES Chapter 20 (Doc Ref. 5.1).</p> <p>The approach to the assessment of the likely significant effects, such that the extent of the impact of the Project on the significance of affected heritage assets is robustly understood, is described in Section 7.9 of ES Chapter 7 (Doc Ref. 5.1).</p> <p>The approach to assessment is policy compliant.</p>
	5.194	<p>Detailed studies will be required on those heritage assets affected by noise, light and indirect impacts based on the guidance provided in <i>The Setting of Heritage Assets</i> and the <i>Aviation Noise Metric</i>. Where proposed development will affect the setting of a heritage asset, accurate representative visualisations may be necessary to assess the impact.</p>	<p>Impacts have been considered in accordance with the cited guidance documents. The guidance used is described in Section 7.4 of ES Chapter 7 (Doc Ref. 5.1). The assessment is provided in Section 7.9 of ES Chapter 7 (Doc Ref. 5.1) and, where appropriate,</p>

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			visualisations prepared for the Landscape and Visual Assessment of the Project have been reviewed as part of the assessment presented in that section.
	5.195	<p>The applicant is encouraged, where opportunities exist, to prepare proposals which can make a positive contribution to the historic environment, and to consider how their scheme takes account of the significance of heritage assets affected. This can include, where possible:</p> <ul style="list-style-type: none"> • Enhancing, through a range of measures such as sensitive design, the significance of heritage assets or setting affected; • Considering measures that address those heritage assets that are at risk, or which may become at risk, as a result of the scheme; and • Considering how visual or noise impacts can affect heritage assets, and whether there may be opportunities to enhance access to or interpretation, understanding and appreciation of the heritage assets affected by the scheme. <p>Careful consideration in preparing the scheme will be required on whether the impacts on the historic environment will be direct or indirect, temporary or permanent.</p>	<p>Opportunities for enhancing the significance of relevant heritage assets have been considered. Where such opportunities are possible, these are described in Section 7.8 of ES Chapter 7 (Doc Ref. 5.1). The assessment presented in Section 7.9 of ES Chapter 7 (Doc Ref. 5.1) identifies impacts and effects in terms of their nature (direct/indirect) and duration.</p>
	5.199	<p>The Secretary of State will take into account: the desirability of sustaining and, where appropriate, enhancing the significance of heritage assets; the contribution of their settings; and the positive contribution their conservation can make to supporting sustainable communities – including to their quality of life, their economic vitality, and to the public’s enjoyment of these assets. The Secretary of State will also take into account the desirability of new development making a positive contribution to the character and local distinctiveness of the historic environment. The consideration of design should include scale,</p>	<p>Section 8.13 of the Planning Statement (Doc Ref. 7.1) considers the effects of the Project on heritage assets whilst Section 9 of the Planning Statement (Doc Ref. 7.1) weighs these effects against the public benefits of the Project, as required by these policies.</p>

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		height, massing, alignment, materials, use and landscaping (for example screen planting).	
	5.205	Where the proposed development will lead to less than substantial harm to the significance of a designated heritage asset, this harm should be weighed against the public benefits of the proposal, including securing its optimum viable use.	
	5.208	The applicant should look for opportunities for new development within Conservation Areas and World Heritage Sites, and within the setting of heritage assets, to enhance and better reveal their significance. Proposals that preserve those elements of the setting that make a positive contribution to or better reveal the significance of the asset should be treated favourably.	Opportunities for enhancing the significance of heritage assets have been considered. Where such opportunities are possible, these are described in Section 7.8 of ES Chapter 7 (Doc Ref. 5.1).
	5.209	A documentary record of our past is not as valuable as retaining the heritage asset, and therefore the ability to record evidence of the asset should not be a factor in deciding whether consent should be given.	Recommendations to offset the loss of heritage significance (value) through documentary recording are set out in Section 7.9 of ES Chapter 7 (Doc Ref. 5.1).
	5.210	Where the loss of the whole or part of a heritage asset's significance is justified, the Secretary of State will require the applicant to record and advance understanding of the significance of the heritage asset before it is lost (wholly or in part). The extent of the requirement should be proportionate to the nature and level of the asset's significance. The applicant should be required to publish this evidence and to deposit copies of the reports with the relevant Historic Environmental Record. They should also be required to deposit the archive generated in a local museum or other public repository willing to receive it.	Archaeological Evaluation Reports (forming ES Appendix 7.6.2 (Doc Ref. 5.3) and ES Appendix 7.6.3 (Doc Ref. 5.3)) have been prepared to understand the probability that the development site may include as yet undiscovered heritage assets with archaeological interest, the findings of which have led to the production of Written Schemes of Investigation for post-consent Archaeological Investigations (forming ES Appendix 7.8.1 (Doc Ref.
	5.211	Where appropriate, the Secretary of State will impose requirements to the development consent order to ensure that the work is undertaken in a timely manner, in accordance with a written scheme of investigation that complies with the policy in the Airports NPS and has been agreed in writing with the relevant local authority, and that the completion of the exercise is properly secured.	

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	5.212	Where there is a high probability that a development site may include as yet undiscovered heritage assets with archaeological interest, the Secretary of State will consider requirements to ensure appropriate procedures are in place for the identification and treatment of such assets discovered during construction.	5.3) and ES Appendix 7.8.2 (Doc Ref. 5.3)) to be secured as part of the DCO.
Design	4.29	The applicant should include design as an integral consideration from the outset of a proposal.	The importance of good design is acknowledged in Section 7 of the Planning Statement (Doc Ref. 7.1) and the design of the Project, including its evolution, is set out and justified in full in the Design and Access Statement (Doc Ref. 7.3). Additionally, the Sustainability Statement which forms Planning Statement Appendix D (Doc Ref. 7.1) considers how the Project addresses policy and legislation relevant to sustainability.
	4.30	Visual appearance should be an important factor in considering the scheme design, as well as functionality, fitness for purpose, sustainability and cost. Applying 'good design' to airports projects should therefore produce sustainable infrastructure sensitive to place, efficient in the use of natural resources and energy used in their construction, and matched by an appearance that demonstrates good aesthetics as far as possible.	
	4.31	A good design should meet the principal objectives of the scheme by eliminating or substantially mitigating the adverse impacts of the development, for example by improving operational conditions. It should also mitigate any existing adverse impacts wherever possible, for example in relation to safety or the environment. A good design will also be one that sustains the improvements to operational efficiency for as many years as is practicable, taking into account capital cost, economics and environmental impacts.	
	4.32	Scheme design will be an important and relevant consideration in decision making. The Secretary of State will need to be satisfied that projects are sustainable and as aesthetically sensitive, durable, adaptable and resilient as they can reasonably be, having regard to regulatory and other constraints and including accounting for natural hazards such as flooding. The Secretary of State will also need to be satisfied that extant security, customs and immigration measures are maintained or reprovided.	

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	4.33	The scheme should take into account, as far as possible, both functionality, including fitness for purpose and sustainability, and aesthetics, including the scheme's contribution to the quality of the area in which it would be located. The applicant will want to consider the role of technology in delivering new airports projects. Professional, independent advice on the design aspects of a proposal should be undertaken to ensure good design principles are embedded into infrastructure proposals.	
	4.34	There may be opportunities for the applicant to demonstrate good design in terms of siting and design measures relative to existing landscape and historical character and function, landscape permeability, landform, and vegetation.	
	4.35	The applicant should be able to demonstrate in its application how the design process was conducted and how the proposed design evolved. Where a number of different designs were considered, the applicant should set out the reasons why the favoured choice has been selected. The Examining Authority and Secretary of State will take into account the ultimate purpose of the infrastructure and bear in mind the operational, safety and security standards which the design has to satisfy.	
Water Environment	5.152	<p>Applications for projects in the following locations should be accompanied by a flood risk assessment:</p> <ul style="list-style-type: none"> • Flood Zones 2 and 3 (medium and high probability of river and sea flooding); • Flood Zone 1 (low probability of river and sea flooding) for projects of 1 hectare or greater, or projects which may be subject to other sources of flooding (local watercourses, surface water, groundwater or reservoirs), or where the Environment Agency has notified the local planning authority that there are critical drainage problems. 	A Flood Risk Assessment has been completed in accordance with the policy requirement and is provided in ES Appendix 11.9.6 (Doc Ref. 5.3).

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	5.153	The applicant should identify and assess the risks of all forms of flooding to and from the preferred scheme, and demonstrate how these flood risks will be managed, taking climate change into account.	
	5.154	<p>In preparing a flood risk assessment the applicant should:</p> <ul style="list-style-type: none"> • Consider the risk of all forms of flooding arising from the development comprised in the preferred scheme, in addition to the risk of flooding to the project, and demonstrate how these risks will be managed and, where relevant, mitigated, so that the development remains safe throughout its lifetime;¹⁹⁷ • Take into account the impacts of climate change, clearly stating the development lifetime over which the assessment has been made; • Consider the need for safe access and exit arrangements; • Include the assessment of residual risk after risk reduction measures have been taken into account, and demonstrate that this is acceptable for the development; • Consider if there is a need to remain operational during a worst case flood event over the preferred scheme's lifetime; and • Provide evidence for the Secretary of State to apply the Sequential Test and Exception Test,¹⁹⁸ as appropriate. 	
	5.155	Where the preferred scheme may be affected by, or may add to, flood risk, the applicant is advised to seek early pre-application discussions with the Environment Agency, and, where relevant, other flood risk management bodies such as lead local flood authorities, Internal Drainage Boards, sewerage undertakers, highways authorities and reservoir owners and operators. These discussions can be used to identify the likelihood and possible extent and nature of the flood risk, help scope the flood risk assessment, and identify the information that may be required by the Secretary of State to reach a decision on the application. If the Environment Agency has concerns about proposals on flood risk grounds, the applicant is encouraged to discuss these	

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		concerns at a sufficiently early stage with the Environment Agency and explore ways in which the proposal might be amended, or additional information provided, which would satisfy the Environment Agency's concerns, before the application for development consent is submitted.	
	5.156	For local flood risk (surface water, groundwater and ordinary watercourse flooding), local flood risk management strategies and surface water management plans provide useful sources of information for consideration in a flood risk assessment. Surface water flood issues need to be understood to allow them to be taken into account, for example by clearly identifying and managing flow routes.	
	5.157	When assessing the potential impacts of climate change on airports which can be wider than flooding impacts, such as implications from heat and water availability and the potential adaptation strategies for them, the applicant should take into account the latest UK Climate Change Risk Assessment, the latest set of UK Climate Projections, and other relevant sources of climate change evidence.	
	5.158	The applicant should ensure that the preferred scheme design takes into account flood risk, and should put forward measures to mitigate the impact of flooding.	
	5.159	Mitigation measures will need to be developed as part of the applicant's application for development consent to ensure that it is safe from flooding, and will not increase flood risk elsewhere for the proposed development's lifetime, taking into account climate change.	In accordance with the policy requirement, the drainage design for the Project has applied a hierarchical approach to design and includes the use of sustainable drainage techniques. The measures are specifically set out in Section 11.8 of ES Chapter 11 (Doc Ref. 5.1).
	5.160	To satisfactorily manage flood risk and the impact of the natural water cycle on people, property and ecosystems, good design and infrastructure may need to be secured using requirements or planning obligations. This may include the use of sustainable drainage systems but could also include vegetation to help to slow runoff, hold back peak flows, and make landscapes more able to absorb the impact of severe weather events.	

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	5.161	<p>In the Airports NPS, the term sustainable drainage systems is used and taken to cover the whole range of sustainable approaches to surface water drainage management including:</p> <ul style="list-style-type: none"> • Source control measures including rainwater recycling and drainage; • Infiltration devices to allow water to soak into the ground, that can include individual soakaways and communal facilities; • Filter strips and swales, which are vegetated features that hold and drain water downhill mimicking natural drainage patterns; • Filter drains and porous pavements to allow rainwater and runoff to infiltrate into permeable material below ground and provide storage if needed; 	
	5.162	Site layout and surface water drainage systems should be able to cope with events that exceed the design capacity of the system, so that excess water can be safely stored on or conveyed from the site without adverse impacts.	
	5.163	The surface water drainage arrangements for any project should be such that the volumes and peak flow rates of surface water leaving the site are no greater than the rates prior to the proposed project, taking into account climate change, unless specific off-site arrangements are made and result in the same net effect.	
	5.164	It may be necessary to provide surface water storage and infiltration to limit and reduce both the peak rate of discharge from the site and the total volume discharged from the main application site. There may be circumstances where it is appropriate for infiltration attenuation storage to be provided outside the project site, if necessary through the use of a planning obligation or a development consent order requirement.	
	5.165	The sequential approach should be applied to the layout and design of the project. Vulnerable uses should be located on parts of the site at lower probability and residual risk of flooding. The applicant should seek opportunities where appropriate to use open space for multiple	

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		<p>purposes such as amenity, wildlife habitat, and flood storage uses. Opportunities can be taken to lower flood risk by improving flow routes, flood storage capacity and using sustainable drainage systems.</p>	
	5.166	<p>Where flood risk is a factor in determining an application for development consent, the Secretary of State will need to be satisfied that, where relevant:</p> <ul style="list-style-type: none"> • The application is supported by an appropriate flood risk assessment; and • The Sequential Test has been applied as part of site selection and, if required, the Exception Test. 	
	5.167	<p>When determining an application, the Secretary of State will need to be satisfied that flood risk will not be increased elsewhere, and will only consider development appropriate in areas at risk of flooding where, informed by a flood risk assessment, following the Sequential Test and, if required, the Exception Test, it can be demonstrated that:</p> <ul style="list-style-type: none"> • Within the site, the most vulnerable development is located in areas of lowest flood risk unless there are overriding reasons to prefer a different location; and • Over its lifetime, development is appropriately flood resilient and resistant, including safe access and escape routes where required, and that any residual risk can be safely managed, including by emergency planning, and that priority is given to the use of sustainable drainage systems. 	
	5.168	<p>The applicant should take into account the potential impacts of climate change using the latest UK Climate Change Risk Assessment, the latest set of UK Climate Projections, and other relevant sources of climate change evidence. The applicant should also ensure any environment statement that is prepared identifies appropriate mitigation or adaptation measures. This should cover the estimated lifetime of the new</p>	<p>In accordance with the policy requirement, full consideration has been given to the UK Climate Change Risk Assessment in Section 15.5 of ES Chapter 15 (Doc Ref. 5.1). Section 15.3 of ES Chapter 15 (Doc Ref. 5.1) sets out the responses to comments</p>

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		infrastructure. Should a new set of UK Climate Projections become available after the preparation of an environmental statement, the Examining Authority or the Secretary of State will consider whether they need to request additional information from the applicant as part of the development consent application.	received from the Planning Inspectorate via the Scoping Opinion as well as engagement with statutory consultation bodies and other key stakeholders. Mitigation measures have been developed to manage risks and these are described in Section 15.8 of ES Chapter 15 (Doc Ref. 5.1).
	5.169	When determining an application, the Secretary of State will need to be satisfied that the potential effects of climate change on the development have been considered as part of the design.	
	5.175	The applicant should make sufficiently early contact with the relevant regulators, including the Environment Agency, for abstraction licensing and environmental permitting, and with the water supply company likely to supply the water. Where the proposed development is subject to an Environmental Impact Assessment and the development is likely to have significant adverse effects on the water environment, the applicant should ascertain the existing status of, and carry out an assessment of, the impacts of the proposed project on water quality, water resources and physical characteristics as part of the environmental statement.	A Water Framework Directive (WFD) Compliance Assessment has been completed in accordance with the policy requirement and is provided as ES Appendix 11.9.2 (Doc Ref. 5.3).
	5.176	Any environmental statement should describe: <ul style="list-style-type: none"> • The existing quality of water affected by the proposed project; • Existing water resources affected by the proposed project and the impacts of the proposed project on water resources; • Existing physical characteristics of the water environment (including quantity and dynamics of flow) affected by the proposed project, and any impact of physical modifications to these characteristics; • Any impacts of the proposed project on water bodies or protected areas under the Water Framework Directive and source protection zones around potable groundwater abstractions; and • Any cumulative effects. 	An assessment of the impacts of the Project on water quality and water resources has been undertaken and is outlined in Section 11.9 of ES Chapter 11 (Doc Ref. 5.1). The assessment demonstrates compliance with the policy requirement.
	5.177	The applicant should assess the effects on the surrounding water and wastewater treatment network in cooperation with the relevant water	An assessment of the cumulative effects of the Project on the water environment

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		and sewerage undertaker(s). It should also address any future water infrastructure needed for the preferred scheme, including for supplies and sewerage treatment, and the effects on the surrounding water and wastewater treatment network. This assessment would be based on the additional wastewater flows which would need to be treated at sewage treatment works and should be developed through liaison with the relevant water and sewerage undertaker(s).	is provided in Section 20.7 of ES Chapter 20 (Doc Ref. 5.1). This assessment has been informed by the Wastewater Assessment , which forms ES Appendix 11.9.7 (Doc Ref. 5.3).
	5.178	The impact on local water resources can be minimised through planning and design for the efficient use of water, including water recycling.	The Project will include measures to minimise the impact on local water resources. This is set out in Section 11.8 of ES Chapter 11 (Doc Ref. 5.1). The use of these measures has been informed by the Water Supply Assessment , which forms ES Appendix 11.9.8 (Doc Ref. 5.3).
	5.179	The Secretary of State will need to consider whether the mitigation measures put forward by the applicant which are needed for operation and construction (and which may be over and above any which may form part of the development consent application) are acceptable.	
	5.180	The project should adhere to any national standards for sustainable drainage systems, which introduce a hierarchical approach to drainage design that promotes the most sustainable approach but recognises the feasibility and use of conventional drainage systems as part of a sustainable solution for any given site given its constraints.	The drainage design for the Project has applied a hierarchical approach to design and includes the use of sustainable drainage techniques. The measures are specifically set out in Section 11.8 of ES Chapter 11 (Doc Ref. 5.1) which demonstrate compliance with the policy.
	5.181	The risk of impacts on the water environment can be reduced through careful design to adhere to good pollution practice.	The Code of Construction Practice (CoCP) provided as ES Appendix 5.3.2 (Doc Ref. 5.3) sets out proposed measures to be implemented during construction, including the protection of surface water and groundwater resources.

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	5.182	Activities that discharge to the water environment are subject to pollution control, and the considerations set out at paragraphs 4.53-4.59 above covering the interface between planning and environmental permitting therefore apply. These considerations will also apply in an analogous way to the abstraction licensing regime regulating activities that take water from the environment, and to the control regimes relating to works to, and structures in, on, or under, a controlled water.	A water treatment works (as described in Section 1.1 of the Planning Statement (Doc Ref. 7.1) and Section 11.8 of ES Chapter 11 (Doc Ref. 5.1)) forms part of the Project and will treat surface water runoff from the aprons, runways and taxiways and provide effective pollution controls to waterways in accordance with the policy requirement.
	5.183	The Secretary of State will generally need to give more weight to impacts on the water environment where a project would have adverse effects on the achievement of the environmental objectives established under the Water Framework Directive.	
	5.184	The Secretary of State will need to be satisfied that a proposal has had regard to the Thames river basin management plan and the Water Framework Directive and its daughter Directives on priority substances and groundwater. In terms of Water Framework Directive compliance, the overall aim of development should be to prevent deterioration in status of water bodies, to support the achievement of the objectives in the Thames river basin management plan and not to jeopardise the future achievement of good status for any affected water bodies. If the development is considered likely to cause deterioration of water body status or to prevent the achievement of good groundwater status or of good ecological status or potential, compliance with Article 4.7 of the Water Framework Directive must be demonstrated. Any use of Article 4.7 must be reported in the Thames river basin management plan.	The relevant impacts are identified in the Water Framework Directive (WFD) Compliance Assessment in ES Appendix 11.9.2 (Doc Ref. 5.3).
	5.185	The Secretary of State will need to consider the interactions of the preferred scheme with other plans, such as statutory water resources management plans.	The drainage design for the Project has applied a hierarchical approach to design and includes the use of

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			<p>sustainable drainage techniques. The measures set out in Section 11.8 of ES Chapter 11 (Doc Ref. 5.1) demonstrate compliance with policy requirement.</p>
	5.186	<p>The Secretary of State will need to consider proposals put forward by the applicant to mitigate adverse effects on the water environment, taking into account the likely impact of climate change on water availability, and whether appropriate requirements should be attached to any development consent and / or planning obligations. If the Environment Agency continues to have concerns, and objects to the grant of development consent on the grounds of impacts on water quality / resources, the Secretary of State can grant consent, but will need to be satisfied that all reasonable steps have been taken by the applicant and the Environment Agency to try to resolve the concerns.</p>	<p>The methodology, definition of baseline conditions and assessment provided in of the water environment has been informed by ongoing engagement with the EA regarding permitting, water quality (including WFD requirements) and water resources. A summary of this engagement is provided in Section 11.3 of ES Chapter 11 (Doc Ref. 5.1).</p> <p>The impacts of the Project on water quality and water resources (including WFD) are provided in the Water Framework Directive (WFD) Compliance Assessment provided as ES Appendix 11.9.2 (Doc Ref. 5.3).</p> <p>From the assessment undertaken of the potential effects on all elements of the water environment (as contained in Section 11.9 of ES Chapter 11 (Doc Ref. 5.1)), suitable mitigation has been proposed (as set out in Section 11.8 of ES Chapter 11 (Doc Ref. 5.1)) and it is concluded that there are no significant residual effects and therefore compliant.</p>

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Health and Wellbeing	4.70	The construction and use of airports infrastructure has the potential to affect people's health, wellbeing and quality of life. Infrastructure can have direct impacts on health because of traffic, noise, vibration, air quality and emissions, light pollution, community severance, dust, odour, polluting water, hazardous waste and pests.	Likely significant health impacts arising from the Project are identified in Section 18.8 of ES Chapter 18 (Doc Ref. 5.1).
	4.71	New or enhanced airports infrastructure may also have indirect health impacts, for example if they affect access to key public services, local transport, opportunities for cycling and walking, or the use of open space for recreation and physical activity. It should also be noted, however, that the increased employment stemming from airport expansion may have indirect positive health impacts.	
	4.72	As described elsewhere in the Airports NPS, where the proposed project has likely significant environmental impacts that would have an effect on human beings, any environmental statement should identify and set out the assessment of any likely significant health impacts.	
	4.73	The applicant should identify measures to avoid, reduce or compensate for adverse health impacts as appropriate. These impacts may affect people simultaneously, so the applicant, the Examining Authority and the Secretary of State (in determining an application for development consent) should consider the cumulative impact on health.	The means of mitigation of adverse health impacts are set out in Section 18.7 of ES Chapter 18 (Doc Ref. 5.1). Cumulative impacts on health are then considered and assessed in Section 18.10 of ES Chapter 18 (Doc Ref. 5.1).
Landscape, Townscape and Visual Resources	5.213	For airport development, landscape and visual effects also include tranquillity effects, which would affect people's enjoyment of the natural environment and recreational facilities. In this context, references to landscape should be taken as covering local landscape, waterscape and townscape character and quality, where appropriate.	In accordance with the policy requirement, landscape and townscape character, condition and quality are described in Section 8.6 of ES Chapter 8 (Doc Ref. 5.1). An assessment of the likely landscape and visual effects of the Project is presented in Section 8.9 of ES Chapter 8 (Doc Ref. 5.1).
	5.214	Where the development is subject to an Environmental Impact Assessment, the applicant should undertake an assessment of any likely significant landscape and visual impacts and describe them in the	

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		environmental statement. The landscape and visual assessment should reference any landscape character assessment and associated studies as a means of assessing landscape impacts relevant to the preferred scheme. In addition, the applicant's assessment should take account of any relevant policies based on these assessments in local development documents.	Cumulative effects on landscape, townscape and visual resources and tranquility are described in Section 8.11 of ES Chapter 8 (Doc Ref. 5.1). This assessment refers to relevant landscape character and green infrastructure studies as a means of assessing the landscape effects and also takes account of relevant policies in local development documents as identified within Section 8.2 of ES Chapter 8 (Doc Ref. 5.1).
	5.215	The applicant's assessment should include any significant effects during construction of the preferred scheme and / or the significant effects of the completed development and its operation on landscape components and landscape character, including historic characterisation. This should include assessment of any landscape and visual impacts as a result of the development, for example surface access proposals or aviation activity.	An assessment of the likely landscape and visual effects of the Project during both the construction and operational periods is presented in Section 8.9 of ES Chapter 8 (Doc Ref. 5.1). Cumulative effects on landscape, townscape and visual resources and tranquility are described in Section 8.11 of ES Chapter 8 (Doc Ref. 5.1).
	5.216	The assessment should include the visibility and conspicuousness of the preferred scheme during construction and the presence and operation of the preferred scheme and potential impacts on views and visual amenity. This should include any noise and light pollution effects, including on local amenity, tranquillity and nature conservation.	Section 8.8 of ES Chapter 8 (Doc Ref. 5.1) describes the proposed embedded and additional measures to mitigate significant adverse landscape and visual effects. This matter is also addressed in the Design and Access Statement (Doc Ref. 7.3) where it is demonstrated that the Project has been carefully
	5.217	Adverse landscape and visual effects may be minimised through appropriate design (including choice of materials), and landscaping schemes. Materials and designs for the Heathrow Northwest Runway scheme should be given careful consideration.	
	5.218	Landscape effects depend on the nature of the existing landscape likely to be changed and nature of the effect likely to occur. Both these factors	

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		need to be considered in judging the impact of the preferred scheme on the landscape. The preferred scheme needs to be designed carefully, taking account of the potential impact on the landscape. Having regard to siting, operational and other relevant constraints, the development should aim to avoid or minimise harm to the landscape, providing reasonable mitigation where possible and appropriate.	designed to minimise its impact on the landscape. The effects of noise in terms of tranquility and the effects of light generally on night time visual amenity have been assessed in Sections 8.9 and 8.11 of ES Chapter 8 (Doc Ref. 5.1). These assessments demonstrate the Project's compliance with the policy requirement.
	5.219	Great weight should be given to conserving landscape and scenic beauty in nationally designated areas. National Parks, the Broads and Areas of Outstanding Natural Beauty have the highest status of protection in relation to landscape and scenic beauty. Each of these designated areas has specific statutory purposes which help ensure their continued protection and which the Secretary of State has a statutory duty to have regard to in decisions.	Areas of Outstanding Natural Beauty (AONBs) and National Parks within the study area include High Weald AONB, Surrey Hills AONB, Kent Downs AONB and South Downs National Park. These areas, along with areas of landscape that are highly valued locally and/or
	5.222	The duty to have regard to the purposes of nationally designated areas also applies when considering applications for projects outside the boundaries of these areas which may have impacts within them. The development should aim to avoid compromising the purposes of designation, and such projects should be designed sensitively given the various siting, operational, and other relevant constraints.	protected by a local landscape/visual designation are identified in Section 8.6 of ES Chapter 8 (Doc Ref. 5.1) and are used in Section 8.9 of ES Chapter 8 (Doc Ref. 5.1) to inform judgements on the value of a landscape receptor and the magnitude of impact on a landscape receptor. The Project has been designed to sensitively address the purposes of the AONB designations.
	5.223	Outside nationally designated areas, there are local landscapes and townscapes that are highly valued locally and may be protected by local designation. Where a local development document in England has policies based on landscape character assessment, these should be given particular consideration. However, local landscape designations	The nationally designated landscape

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		should not be used in themselves as reasons to refuse consent, as this may unduly restrict acceptable development.	<p>authorities were consulted on the Project as summarised in Section 8.3 of ES Chapter 8 (Doc Ref. 5.1). The effects of the increase in aircraft movements on the AONBs is also assessed in Section 8.9 of ES Chapter 8 (Doc Ref. 5.1). These assessments demonstrate the Project's compliance with the policy.</p> <p>Section 8.9 of ES Chapter 8 (Doc Ref. 5.1) considers impact and tranquility in terms of its assessment of effects on landscape receptors.</p> <p>Section 8.14 of the Planning Statement (Doc Ref. 7.1) summarises the overall visual effects on sensitive receptors whilst Section 9 of the Planning Statement (Doc Ref. 7.1) balances these effects against the wider benefits and adverse impacts of the Project, as required by this policy.</p>
	5.224	In taking decisions, the Secretary of State will consider whether the preferred scheme has been designed carefully, taking account of environmental effects on the landscape and siting, operational and other relevant constraints, to avoid adverse effects on landscape or to minimise harm to the landscape, including by reasonable mitigation.	
	5.225	The Secretary of State will judge whether the visual effects on sensitive receptors, such as local residents, and other receptors, such as visitors to the local area, outweigh the benefits of the development.	
Noise and Vibration	4.70	The construction and use of airports infrastructure has the potential to affect people's health, wellbeing and quality of life. Infrastructure can have direct impacts on health because of traffic, noise, vibration, air quality and emissions, light pollution, community severance, dust, odour, polluting water, hazardous waste and pests.	Negative health impacts have been mitigated against as detailed and assessed in Sections 18.7 and 18.8 of ES Chapter 18 (Doc Ref. 5.1).

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	4.71	New or enhanced airports infrastructure may also have indirect health impacts, for example if they affect access to key public services, local transport, opportunities for cycling and walking, or the use of open space for recreation and physical activity. It should also be noted, however, that the increased employment stemming from airport expansion may have indirect positive health impacts.	Indirect impacts of the Project have been considered in Section 18.8 of ES Chapter 18 (Doc Ref. 5.1). The application includes an Employment, Skills and Business Strategy at ES Appendix 17.8.1 (Doc Ref. 5.3) which sets out measures to enable the local workforce to attain skills relevant to employment opportunities arising from airport growth and which will ensure that the local area benefits from new employment opportunities.
	4.72	As described elsewhere in the Airports NPS, where the proposed project has likely significant environmental impacts that would have an effect on human beings, any environmental statement should identify and set out the assessment of any likely significant health impacts.	ES Chapter 18 (Doc Ref. 5.1) addresses health impacts of the Project, with effects being considered in Section 18.8 .
	4.73	The applicant should identify measures to avoid, reduce or compensate for adverse health impacts as appropriate. These impacts may affect people simultaneously, so the applicant, the Examining Authority and the Secretary of State (in determining an application for development consent) should consider the cumulative impact on health.	Section 18.7 of ES Chapter 18 (Doc Ref. 5.1) details the mitigation measures to ameliorate negative impacts on Health and Community as a result of the Project. Cumulative impacts on health are then considered and assessed in Section 18.10 of ES Chapter 18 (Doc Ref. 5.1).
	5.52	Pursuant to the terms of the Environmental Impact Assessment Regulations, the applicant should undertake a noise assessment for any period of change in air traffic movements prior to opening, for the time of opening, and at the time the airport is forecast to reach full capacity, and (if applicable, being different to either of the other assessment	The assessment years for identifying the likely significant effects of air noise are set out in Section 14.4 of ES Chapter 14 (Doc Ref. 5.1). A description of the noise sources

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		<p>periods) at a point when the airport's noise impact is forecast to be highest. This should form part of the environmental statement. The noise assessment should include the following:</p> <ul style="list-style-type: none"> • A description of the noise sources; • An assessment of the likely significant effect of predicted changes in the noise environment on any noise sensitive premises (including schools and hospitals) and noise sensitive areas (including National Parks and Areas of Outstanding Natural Beauty); • The characteristics of the existing noise environment, including noise from aircraft, using noise exposure maps, and from surface transport and ground operations associated with the project, the latter during both the construction and operational phases of the project; • A prediction on how the noise environment will change with the proposed project; and • Measures to be employed in mitigating the effects of noise. <p>These should take into account construction and operational noise (including from surface access arrangements) and aircraft noise. The applicant's assessment of aircraft noise should be undertaken in accordance with the developing indicative airspace design. This may involve the use of appropriate design parameters and scenarios based on indicative flightpaths.</p>	<p>included in the assessment are also set out in Section 14.4 of ES Chapter 14 (Doc Ref. 5.1). The assessment of significant effects covering the identified source of noise and vibration are described in Section 14.9 of ES Chapter 14 (Doc Ref. 5.1). The effect of noise on sensitive landscape and visual receptors is covered in ES Chapter 8 (Doc Ref. 5.1). The characteristics of the existing noise environment are provided in Section 14.6 of ES Chapter 14 (Doc Ref. 5.1). An assessment of effects due to construction activities and predictions on how the noise environment will change as a result of the Project is provided in Section 14.9 of ES Chapter 14 (Doc Ref. 5.1). Measures to be employed in mitigating the effects of noise are described in Section 14.8 of ES Chapter 14 (Doc Ref. 5.1).</p>
	5.53	<p>Operational noise, with respect to human receptors, should be assessed using the principles of the relevant British Standards and other guidance. For the prediction, assessment and management of construction noise, reference should be made to any British Standards and other guidance which give examples of mitigation strategies. In assessing the likely significant impacts of aircraft noise, the applicant should have regard to the noise assessment principles, including noise metrics, set out in the national policy on airspace.</p>	<p>Operational noise has been assessed consistent with the policy requirement against relevant British Standards and other guidance in Section 14.2 and Section 14.4 of ES Chapter 14 (Doc Ref. 5.1).</p>

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	5.54	Noise management at airports where a noise problem has been identified is subject to the concept of a 'Balanced Approach', referred to above. EU Regulation 598/2014, which adopts the Balanced Approach, also lays down a procedure for the adoption of noise-related operating restrictions, in particular a requirement for prior consultation.	<p>The 'Balanced Approach' to noise control was followed when defining the mitigation measures that are identified in Section 14.8 of ES Chapter 14 (Doc Ref. 5.1). The Noise Envelope is described in Section 14.8 of ES Chapter 14 (Doc Ref. 5.1) with details in ES Appendix 14.9.5: Noise Envelope Background (Doc Ref. 5.3). Best practice construction noise mitigation measures are secured through the Code of Construction Practice (CoCP) which comprises ES Appendix 5.3.2 (Doc Ref. 5.3). The assessment demonstrates the compliance of the Project with policy.</p>
	5.55	The Government recognises that aircraft noise is a significant concern to communities affected and that, as a result of additional runway capacity, noise-related action will need to be taken. Such action should strike a fair balance between the negative impacts of noise and positive impacts of flights.	
	5.56	The Government also recognises that predictable periods of relief from aircraft noise (known as respite) are important for communities affected, and that noise at night is widely regarded as the least acceptable aspect of aviation noise for those communities, with the costs on communities of aircraft noise during the night (particularly the health costs associated with sleep disturbance) being higher.	
	5.57	The Secretary of State will consider whether the mitigation measures put forward by the applicant following consultation are acceptable. The noise mitigation measures should ensure the impact of aircraft noise is limited and, where possible, reduced compared to the 2013 baseline assessed by the Airports Commission.	
	5.58	The Secretary of State will consider whether the mitigation measures put forward by the applicant following consultation are acceptable. The noise mitigation measures should ensure the impact of aircraft noise is limited and, where possible, reduced compared to the 2013 baseline assessed by the Airports Commission.	
	5.60	The applicant should put forward plans for a noise envelope. Such an envelope should be tailored to local priorities and include clear noise performance targets. As such, the design of the envelope should be defined in consultation with local communities and relevant	

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		stakeholders, and take account of any independent guidance such as from the Independent Commission on Civil Aviation Noise. The benefits of future technological improvements should be shared between the applicant and its local communities, hence helping to achieve a balance between growth and noise reduction. Suitable review periods should be set in consultation with the parties mentioned above to ensure the noise envelope's framework remains relevant.	
	5.61	The applicant should put forward plans for a runway alternation scheme that provides communities affected with predictable periods of respite (though the Government acknowledges that the duration of periods of respite that currently apply will be reduced). Predictability should be afforded to the extent that this is within the airport operator's control. The details of any such scheme, including timings, duration and scheduling, should be defined in consultation with local communities and relevant stakeholders, and take account of any independent guidance such as from the Independent Commission on Civil Aviation Noise.	
	5.62	The Government also expects a ban on scheduled night flights for a period of six and a half hours, between the hours of 11pm and 7am, to be implemented. The rules around its operation, including the exact timings of such a ban, should be defined in consultation with local communities and relevant stakeholders, in line with EU Regulation 598/2014. In addition, outside the hours of a ban, the Government expects the applicant to make particular efforts to incentivise the use of the quietest aircraft at night.	
	5.64	Noise mitigation measures at the construction stage should also be provided. These should draw on best practice from other major construction schemes, with due regard given to any relevant British Standards and other guidance, and should be taken into account during the procurement of contractors.	

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	5.65	Other measures to mitigate noise during the construction and operation of the development may include one or more of the following: <ul style="list-style-type: none"> • Reducing noise at point of generation and containment of noise generated; • Where possible, optimising the distance between source and noise-sensitive receptors, and incorporating good design to minimise noise transmission through screening by natural barriers or other buildings; and • Restricting activities allowed on the site. 	
	5.66	The Secretary of State will expect the applicant to put forward proposals as to how these measures may be secured and enforced, including the bodies who may enforce the measures. These bodies might include the Secretary of State, local authorities (including those over a wider area), and / or the Civil Aviation Authority.	
	5.67	The proposed development must be undertaken in accordance with statutory obligations for noise. Due regard must have been given to national policy on aviation noise, and the relevant sections of the Noise Policy Statement for England, the National Planning Policy Framework, and the Government's associated planning guidance on noise. However, the Airports NPS must be used as the primary policy on noise when considering the Heathrow Northwest Runway scheme, and has primacy over other wider noise policy sources.	Although this requirement is primarily concerned with the Heathrow Northwest Runway scheme, it is also relevant to the Project. The requirements of statutory obligations and policies stated are presented in Section 14.2 of ES Chapter 14 (Doc Ref. 5.1).
	5.68	Development consent should not be granted unless the Secretary of State is satisfied that the proposals will meet the following aims for the effective management and control of noise, within the context of Government policy on sustainable development: <ul style="list-style-type: none"> • Avoid significant adverse impacts on health and quality of life from noise; • Mitigate and minimise adverse impacts on health and quality of life from noise; and 	Section 14.9 of ES Chapter 14 (Doc Ref. 5.1) shows that noise during the Project will be managed consistent with the aims of this policy. The mitigation measures to be employed in achieving this are set out in Section 14.8 of ES Chapter 14 (Doc Ref. 5.1).

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		<ul style="list-style-type: none"> Where possible, contribute to improvements to health and quality of life. 	
	5.250	The applicant should seek to minimise impacts on local people, to consult on the details of its works, and to put them in place quickly. The Government also looks to the applicant to consult on the detail of a community compensation fund.	Full details of the proposed noise insulation scheme and associated community compensation, including details of consultation, fund sourcing, fund size and duration, eligibility and the means of delivering and securing the Project are set out in Section 8.20 of the Planning Statement (Doc Ref. 7.1).
	5.252	The Secretary of State will also consider whether the applicant has consulted on the details of a community compensation fund, including source of revenue, size and duration of fund, eligibility, and how delivery will be ensured.	
	5.253	The Secretary of State will expect the applicant to demonstrate how these provisions are secured, and how they will be operated. The applicant will also need to show how these measures will be administered to ensure that they are relevant to planning when in operation. The mechanisms for enforcing these provisions should also be demonstrated, along with the appropriateness of any identified enforcing body, which may include the Secretary of State.	
Ground Conditions	5.227	Where necessary, land stability should be considered in respect of new development, as set out in the National Planning Policy Framework and supporting planning guidance. Specifically, proposals should be appropriate for the location, including preventing unacceptable risks from land instability. If land stability could be an issue, the applicant should seek appropriate technical and environmental expert advice to assess the likely consequences of proposed developments on sites where subsidence, landslides and ground compression is known or suspected. Applicants should liaise with the Coal Authority if necessary.	In accordance with the policy requirement, a geotechnical assessment has been undertaken which takes into account potential land stability issues. Section 10.8 of ES Chapter 10 (Doc Ref. 5.1) summarises how land stability risks would be mitigated and minimised. This discussion is supported by the Preliminary Risk Assessment which has appropriately accounted for the Site's surrounding context and which forms ES Appendix 10.9.1 (Doc Ref. 5.3). This has ensured that
	5.228	A preliminary assessment of ground instability should be carried out at the earliest possible stage before a detailed application for development consent is prepared. The applicant should ensure that any necessary investigations are undertaken to confirm that their sites are and will	

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		remain stable, or can be made so as part of the development. The site needs to be assessed in the context of surrounding areas where subsidence, landslides and land compression could threaten the development during its anticipated life or damage neighbouring land or property. This could be in the form of a land stability or slope stability risk assessment report.	appropriate technical and environmental advice has informed the assessment of ground conditions. The Preliminary Risk Assessment has identified that there are areas at moderate risk for compressibility across the site which appear to correspond to BGS mapped areas of Alluvium as well as a moderate risk of slope instability for a small area along the A23 embankment.
	5.229	The applicant has a range of mechanisms available to mitigate and minimise risks of land instability. These include: <ul style="list-style-type: none"> • Establishing the principle and layout of new development, for example avoiding mine entries and other hazards; • Ensuring proper design of structures to cope with any movement expected and other hazards such as mine and / or ground gases; or • Requiring ground improvement techniques, usually involving the removal of poor material and its replacement with suitable inert and stable material. For development on land previously affected by mining activity, this may mean prior extraction of any remaining mineral resource. 	Consistent with the policy requirement, the mitigation measures incorporated to minimise impacts relating to land instability are set out in Section 10.8 of ES Chapter 10 (Doc Ref. 5.1).
	5.109 – 5.127	Policies concerned with land contamination. For developments where land may be affected by contamination, or existing mitigation is in place in respect of historical contamination, the applicant should have regard to the statutory regime contained in Part IIA of the Environmental Protection Act 1990 and relevant Government guidance relating to or dealing with contaminated land. Where the development is subject to an Environmental Impact Assessment (EIA), the applicant should undertake an assessment of any likely significant land quality effects and describe them in the ES. How they have been	A Preliminary Risk Assessment which forms ES Appendix 10.9.1 (Doc Ref. 5.3) has appraised potential areas of land contamination likely to be affected by the Project in accordance with statutory guidance and best practice and forms the main source of information in defining the Baseline Environment that is described in

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		avoided/minimised/addressed should be documented. The objective is to ensure that the site is suitable for its intended use.	Section 10.6 of ES Chapter 10 (Doc Ref. 5.1). In response to the findings of a number of historical and current potential sources of contamination across the Project site a series of mitigation measures have been adopted as part of the project to ensure the land contamination risk has been suitably addressed. The mitigation measures incorporated to minimise these risks are set out in Section 10.8 of ES Chapter 10 (Doc Ref. 5.1) and principally comprises a remediation strategy. The Project complies with the policy requirement.
	5.117	The applicant should safeguard any mineral resources on the proposed site for the preferred scheme as far as possible.	This is addressed in Section 10.9 of ES Chapter 10 (Doc Ref. 5.1). Preliminary enquiries have been made with third party mineral users regarding opportunities to use the material excavated from the Brick Clay Resource Mineral Safeguarded Area. This will be taken forward within the Materials Management Plan which forms a part of the Construction Code of Practice (CoCP) forming ES Appendix 5.3.2 (Doc Ref. 5.3).
Traffic and Transport	1.35	Under the Equality Act 2010, public bodies have a statutory duty to ensure race, disability and equality are considered in the exercise of their functions. The Equality Assessment considered the potential	The Design and Access Statement (Doc Ref. 7.3) and the Transport Assessment (Doc Ref. 7.4) outline

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		equalities implications of airport expansion, including the effect on persons or groups of persons who share certain characteristics protected by the Equality Act 2010. The Equality Assessment concludes that all of the shortlisted schemes will have effects on these groups, but that such effects can be managed and can ultimately be within appropriate limits. The Airports NPS requires that final impacts on affected groups should be the subject of a detailed review, carefully designed through engagement with the local community, and approved by the Secretary of State. It should be possible to fully or partially mitigate negative equalities impacts through good design, operations and mitigation plans.	those considerations factored into the design of the Project to ensure that the airport is providing equal access for all potential users.
	4.70	The construction and use of airports infrastructure has the potential to affect people's health, wellbeing and quality of life. Infrastructure can have direct impacts on health because of traffic, noise, vibration, air quality and emissions, light pollution, community severance, dust, odour, polluting water, hazardous waste and pests.	Negative health impacts have been mitigated against as detailed and assessed in Sections 18.7 and 18.8 of ES Chapter 18 (Doc Ref. 5.1).
	4.71	New or enhanced airports infrastructure may also have indirect health impacts, for example if they affect access to key public services, local transport, opportunities for cycling and walking, or the use of open space for recreation and physical activity. It should also be noted, however, that the increased employment stemming from airport expansion may have indirect positive health impacts.	Health impacts are considered in ES Chapter 18 (Doc Ref 5.1). Additionally, the application includes an Employment, Skills and Business Strategy at ES Appendix 17.8.1 (Doc Ref. 5.3) which sets out to benefit the local population. The ES (Doc Ref. 5.1) covers mitigation measures to ameliorate any negative impacts.
	4.72	As described elsewhere in the Airports NPS, where the proposed project has likely significant environmental impacts that would have an effect on human beings, any environmental statement should identify and set out the assessment of any likely significant health impacts.	Equality impacts have been assessed and are set out in ES Chapter 18 (Doc Ref. 5.1). The Project is therefore policy compliant.
	4.73	The applicant should identify measures to avoid, reduce or compensate for adverse health impacts as appropriate. These impacts may affect people simultaneously, so the applicant, the Examining Authority and	

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		the Secretary of State (in determining an application for development consent) should consider the cumulative impact on health.	
	4.74	The Government is committed to creating a more accessible and inclusive transport network that provides a range of opportunities and choices for all people to connect with jobs, services and leisure opportunities. This commitment extends to all the users of new airports infrastructure, and to the associated surface access facilities.	
	4.76	<p>In accordance with legal and best practice in relation to accessibility:</p> <ul style="list-style-type: none"> • The Government requires the applicant to include clear details of how plans will improve access on and around the airport by designing and delivering schemes (both new construction and upgrade or refurbishment) that address the accessibility needs of all those who use, or are affected by, surface access infrastructure, including those with physical and/or mental impairments as well as older users. Every opportunity to deliver improvements in accessibility on and to the existing national road network should also be taken; • The Government will continue to work to ensure that all bus and train fleets comply with legal access standards by 2020, and to improve rail station access for those with impairments in accordance with legislation and best practice; and • The car will continue to play an important role, providing disabled people with independence where other forms of transport are not accessible or available. Easy access and car parking provision at the airports is essential to this goal and must meet standards set down in guidance (such as the Department for Transport's <i>Inclusive Mobility</i>). 	<p>The Design and Access Statement (Doc Ref. 7.3) and the Transport Assessment (Doc Ref. 7.4) outline those considerations factored into the design of the Project to ensure that the airport provides equal access for all potential users.</p>
	5.9	The applicant must prepare an airport surface access strategy in conjunction with its Airport Transport Forum, in accordance with the guidance contained in the Aviation Policy Framework. The airport surface access strategy must reflect the needs of the scheme contained in the application for development consent, including any phasing over	<p>In accordance with the policy requirement, the Project is supported by a Transport Assessment (TA) (Doc Ref. 7.4) and Surface Access Commitments (SACs) comprising ES</p>

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		its development, implementation and operational stages, reflecting the changing number of passengers, freight operators and airport workers attributable to the number of air traffic movements. The strategy should reference the role of surface transport in relation to air quality and carbon. The airport surface access strategy must contain specific targets for maximising the proportion of journeys made to the airport by public transport, cycling or walking. The strategy should also contain actions, policies and defined performance indicators for delivering against targets, and should include a mechanism whereby the Airport Transport Forum can oversee implementation of the strategy and monitor progress against targets alongside the implementation and operation of the preferred scheme.	Appendix 5.4.1 (Doc Ref. 5.3). The assessment demonstrates the predicted level of trips by travel mode, which are based on specific targets for maximising the proportion of journeys made by non-car modes. Predicted traffic flows on the highway network in the vicinity of the airport are presented in ES Appendix 12.9.1: Highway Flows and Driver Delay Review (Doc Ref. 5.3). These flows reflect the targets that have been adopted to achieve the mode shift. The air quality impacts from road traffic have been assessed and the results are presented in Section 13.10 of ES Chapter 13 (Doc Ref. 5.1).
	5.10	The applicant should assess the implications of airport expansion on surface access network capacity using the Web TAG methodology stipulated in the Department for Transport guidance, or any successor to such methodology. The applicant should consult Highways England, Network Rail and highway and transport authorities, as appropriate, on the assessment and proposed mitigation measures. The assessment should distinguish between the construction and operational project stages for the development comprised in the application.	Consistent with the policy requirement, transport modelling has been undertaken using the WebTAG methodology. Engagement that has been undertaken is summarised in Section 12.3 of ES Chapter 12 (Doc Ref. 5.1).
	5.11	The applicant should also consult with Highways England, Network Rail and relevant highway and transport authorities, and transport operators, to understand the target completion dates of any third party or external schemes included in existing rail, road or other transport investment plans. It will need to assess the effects of the preferred scheme as influenced by such schemes and plans. Such consultation and	Separate assessments for construction and operation periods are presented in Section 12.9 of ES Chapter 12 (Doc Ref. 5.1).

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		assessment, both of third party schemes on which the preferred scheme depends, and others which interact with it, all of which may be subject to their own planning, funding and approval processes, must be understood in terms of implications of the timings for the applicant's own surface access proposals.	
	5.13	For schemes and related surface access proposals or other works impacting on the strategic road network, the applicant should have regard to DfT Circular 02/2013, <i>The Strategic Road Network and the delivery of sustainable development</i> (or prevailing policy), and the National Networks NPS. This sets out the way in which the highway authority for the strategic road network will engage with communities and the development industry to deliver sustainable development and economic growth, whilst safeguarding the primary function and purpose of the network.	Both the DfT Circular and the National Networks National Policy Statement have been addressed in Section 12.2 of ES Chapter 12 (Doc Ref. 5.1) in accordance with the requirement.
	5.14	The surface access systems and proposed airport infrastructure may have the potential to result in severance in some locations. Where appropriate, the applicant should seek to deliver improvements or mitigation measures that reduce community severance and improve accessibility.	The proposals for surface access as set out in Section 7 of the Transport Assessment (TA) (Doc Ref. 7.4), in Section 12.8 of ES Chapter 12 (Doc Ref. 5.1) and in ES Appendix 5.4.1: Surface Access Commitments (Doc Ref. 5.3) will improve accessibility to the airport for both air passengers and employees. Severance is also considered in Section 12.8 of ES Chapter 12 (Doc Ref. 5.1). The Project therefore complies with the policy requirement.
	5.15	In its application, the applicant should set out the mitigation measures that it considers are required to minimise and mitigate the effect of expansion on existing surface access arrangements.	Section 12.8 of ES Chapter 12 (Doc Ref. 5.1) details mitigation measures associated with the Project and any

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			resultant impacts on traffic and transport.
	5.16	The applicant should demonstrate in its assessment that the proposed surface access strategy will support the additional transport demands generated by airport expansion. This should be appropriately secured.	The Transport Assessment (TA) (Doc Ref. 7.4) and Surface Access Commitments (SACs) comprising ES Appendix 5.4.1 (Doc Ref. 5.3) form part of the documentation for the application for development consent. The documents show the predicted level of trips by the range of travel modes, which are based on specific targets for maximising the proportion of journeys made by non-car modes. Predicted traffic flows on the highway network in the vicinity of the airport are presented in ES Appendix 12.9.1: Highway Flows and Driver Delay Review (Doc Ref. 5.3). These flows reflect the targets that have been adopted to achieve the mode shift.
	5.17	Any application for development consent and accompanying airport surface access strategy must include details of how the applicant will increase the proportion of journeys made to the airport by public transport, cycling and walking to achieve a public transport mode share of at least 50% by 2030, and at least 55% by 2040 for passengers. The applicant should also include details of how, from a 2013 baseline level, it will achieve a 25% reduction of all staff car trips by 2030, and a reduction of 50% by 2040.	A summary of the Surface Access Commitments (SACs) is provided in Section 12.8 of ES Chapter 12 (Doc Ref. 5.1) and in ES Appendix 5.4.1 (Doc Ref. 5.3). The targets in the NPS described for 2030 and 2040 relate specifically to the Heathrow Runway 3 project (“5.1 This chapter focuses on the potential impacts of the Heathrow Northwest Runway scheme”). The

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			SACs set out GAL's commitment to achieving a mode share of 55% by sustainable modes for passenger and staff journeys within three years of the opening of the new runway, and a future aspirational stretch target of 60%. These are described in Section 12.8 of ES Chapter 12 (Doc Ref. 5.1).
	5.18	The applicant should commit to annual public reporting on performance against these specific targets. The airport surface access strategy should consider measures and incentives which could help to manage demand by car users travelling to and from the airport, as well as physical infrastructure interventions, having at all times due regard to the effect of its strategy on the surrounding area and transport networks. The strategy should also include an assessment of the feasibility of the measures proposed as well as the benefits and disbenefits related to those measures, including any implications for Highways England, Network Rail and affected relevant highway authorities and transport providers. These measures could be used to help achieve mode share targets and should be considered in conjunction with measures to mitigate air quality impacts as described in the Airports NPS.	The Project is projected to achieve mode shares as set out in the Surface Access Commitments (SACs) (ES Appendix 5.4.1) (Doc Ref. 5.3)) and annual reporting will be undertaken as part of this. A summary of the monitoring commitments in the SACs is provided in Section 12.8 of ES Chapter 12 (Doc Ref. 5.1). The SACs and the embedded highway improvements have been discussed with Highway Authorities as set out in Section 12.3 of ES Chapter 12 (Doc Ref. 5.1).
	5.20	Where a surface transport scheme is not solely required to deliver airport capacity and has a wider range of beneficiaries, the Government, along with relevant stakeholders, will consider the need for a public funding contribution alongside an appropriate contribution from the airport on a case by case basis. The Government recognises that there may be some works which may not be required at the time the additional runway opens, but will be needed as the additional capacity becomes fully utilised. The same principle applies that, where	Section 12.8 of ES Chapter 12 (Doc Ref. 5.1) details mitigation measures associated with the Project and any resultant impacts on traffic and transport infrastructure. These will be funded by the applicant, complying with the general requirement for developments to pay the cost of upgrading or

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		a transport scheme is not solely required to deliver airport capacity, the Government, along with relevant stakeholders, will consider the need for a public funding contribution alongside an appropriate contribution from the airport on a case by case basis.	enhancing the transport network where there is a need to cope with additional passengers travelling to and from enlarged or growing airports.
	5.21	The applicant's proposals will give rise to impacts on the existing and surrounding transport infrastructure. The Secretary of State will consider whether the applicant has taken all reasonable steps to mitigate these impacts during both the development and construction phase and the operational phase. Where the proposed mitigation measures are insufficient to effectively offset or reduce the impact on the transport network, arising from expansion, of additional passengers, freight operators and airport workers, the Secretary of State will impose requirements on the applicant to accept requirements and / or obligations to fund infrastructure or implement other measures to mitigate the adverse impacts, including air quality.	On the basis of those mitigation measures it is considered that the Project is acceptable and that consent should not be withheld on the basis of surface access.
	5.22	Provided the applicant is willing to commit to transport planning obligations to satisfactorily mitigate transport impacts identified in the transport assessment (including environment and social impacts), with costs being considered in accordance with the Department for Transport's policy on the funding of surface access schemes, development consent should not be withheld on surface access grounds.	
Waste and Resource Management	5.137	The targets for preparation for re-use and recycling of municipal waste (50%), and for construction and demolition waste (70%) set out by the Waste Framework Directive (2008/98/EC) should be considered 'minimum acceptable practice' for the construction and operation of any new airport infrastructure. Exceeding these targets if possible by aiming for exemplar performance in resource efficiency and waste management is recommended, to align with the principles of the EU Action Plan for the Circular Economy.	The Project's target for construction waste (divert 90% of demolition materials from landfill; and divert 80% of construction waste ie. non-demolition waste from landfill) exceeds the 70% target. This is set out in detail in ES Appendix 5.3.2: CoCP Annex 5 -

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			Construction Resources and Waste Management Plan (Doc Ref. 5.3).
	5.138	Large airport infrastructure projects may generate hazardous and non-hazardous waste during construction and operation. The Environment Agency's environmental permitting regime incorporates operational waste management controls for certain activities. When the applicant applies to the Environment Agency for an environmental permit, the Environment Agency will require the application to demonstrate that processes are in place to meet all relevant conditions.	Details of the management of hazardous and non-hazardous waste are set out in ES Appendix 5.3.2: CoCP Annex 5 - Construction Resources and Waste Management Plan (Doc Ref. 5.3).
	5.141	The applicant should set out the arrangements that are proposed for managing any waste produced in the application for development consent. The arrangements described should include information on the proposed waste recovery and disposal system for all waste generated by the development. The applicant should seek to minimise the volume of waste sent for disposal unless it can be demonstrated that the alternative is the best overall environmental, social and economic outcome when considered over the whole lifetime of the project.	Details of the management of waste are set out in ES Appendix 5.3.2: CoCP Annex 5 - Construction Resources and Waste Management Plan (Doc Ref. 5.3).The document presents arrangements that are proposed for managing waste produced including information on the proposed waste recovery and disposal system for all waste generated by the Project consistent with the policy requirement.
	5.143	The applicant should set out a comprehensive suite of mitigations to eliminate or significantly reduce the risk of adverse impacts associated with resource and waste management.	ES Appendix 5.3.2: CoCP Annex 5 - Construction Resources and Waste Management Plan (Doc Ref. 5.3).sets out mitigation measures to eliminate or significantly reduce the risk of adverse impacts associated with resource and waste management in accordance with the policy requirement.
	5.145	The Secretary of State will consider the extent to which the applicant has proposed an effective process that will be followed to ensure	Details of the management of waste are set out in ES Appendix 5.3.2: CoCP

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		<p>effective management of hazardous and non-hazardous waste arising from all stages of the lifetime of the development. The Secretary of State should be satisfied that the process set out provides assurance that:</p> <ul style="list-style-type: none"> • Waste produced will be properly managed, both onsite and offsite; • The waste from the proposed development can be dealt with appropriately by the waste infrastructure which is, or is likely to be, available. Such waste arising should not have an adverse effect on the capacity of existing waste management facilities to deal with other waste arising in the area; and • Adequate steps have been taken to ensure that all waste arising from the site is subject to the principles of the waste hierarchy and are dealt with at the highest possible level within the hierarchy. 	<p>Annex 5 - Construction Resources and Waste Management Plan (Doc Ref. 5.3). The document presents arrangements that are proposed for managing waste produced including information on the proposed waste recovery and disposal system for all waste generated by the Project.</p> <p>Resource management details during construction are identified in ES Appendix 5.3.2: Construction Resources and Waste Management Plan (Doc Ref. 5.3)</p> <p>The Project is therefore assessed as being compliant with the policy requirement.</p>
	5.146	Where necessary, the Secretary of State will require the applicant to develop a resource management plan to ensure that appropriate measures for sustainable resource and waste management are secured.	
Safety and Security	4.5	[In this context], environmental, safety, social and economic benefits and adverse impacts should be considered at national, regional and local levels. These may be identified in the Airports NPS, or elsewhere. The Secretary of State will also have regard to the manner in which such benefits are secured, and the level of confidence in their delivery.	<p>In accordance with the requirement, potential risks to safety in the event of a Major Accidents and Disasters (MA&D) during construction and operation of the Project across the study area have been assessed within ES Appendix 5.3.4: Major Accidents and Disasters (Doc Ref. 5.3), wherein the results of the assessment of the hazards and significance of the risks are outlined. The document demonstrates how the</p>
	4.35	The applicant should be able to demonstrate in its application how the design process was conducted and how the proposed design evolved. Where a number of different designs were considered, the applicant should set out the reasons why the favoured choice has been selected. The Examining Authority and Secretary of State will take into account the ultimate purpose of the infrastructure and bear in mind the	

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		operational, safety and security standards which the design has to satisfy.	<p>Project has been found to satisfy the operational, safety and security standards within all relevant policies of the ANPS.</p> <p>Section 4 of the Design and Access Statement (Doc Ref. 7.3) details the development and evolution of the Project's design.</p>
	4.63	National security considerations apply across all national infrastructure sectors. The Department for Transport acts as the sector sponsor department for the aviation sector, and in this capacity has lead responsibility for security matters and for directing the security approach to be taken, working with the Civil Aviation Authority. The Department for Transport works closely with Government agencies, including the Centre for the Protection of National Infrastructure, to reduce the vulnerability of the aviation sector to terrorism and other national security threats.	
	4.64	Government policy is to ensure that, where possible, proportionate protective security measures are designed into new infrastructure projects at an early stage in the project development. The nature of the aviation sector as a target for terrorism means that security considerations will likely apply in the case of the infrastructure project for which development consent may be sought under the Airports NPS.	
	4.65	Where national security implications have been identified, the applicant should consult with relevant security experts from the Centre for the Protection of National Infrastructure and the Department for Transport to ensure that physical, procedural and personnel security measures have been adequately considered in the design process, and that adequate consideration has been given to the management of security risks. If the Department for Transport, taking advice from the Civil Aviation Authority, Centre for the Protection of National Infrastructure and others it considers appropriate, forms the opinion that it is satisfied that current and potential future security needs are adequately addressed in the project and that relevant guidance on these matters has been appropriately taken into account in the application, it will provide confirmation of this to the Secretary of State, and the Examining	

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		Authority should not need to give any further consideration to the details of the security measures during the examination.	
	4.66	The applicant should only include such security-related information in the application as is necessary to enable the Examining Authority to examine the development consent issues and make a properly informed recommendation on the application.	
	4.69	There remains a considerable threat to aviation security from terrorism. The UK meets this threat with a multi-layered aviation security regime built on intelligence, effective risk management and robust, proportionate measures, brought together under the National Aviation Security Programme. The regulations governing aviation security in the UK have their basis in UK and European law, and are enforced by the Civil Aviation Authority on behalf of the Secretary of State. The design and operation of the Heathrow Northwest Runway scheme, to which the Airports NPS relates, must comply with aviation security regulations and guidance in the same way as existing airports. There may also be other security considerations linked to any application for development consent under the Airports NPS.	
Community Engagement	5.258	The applicant must engage constructively with the community engagement board throughout the planning process, with its membership (including an independent chair), and with any programme(s) of work the community engagement board agrees to take forward.	Engagement on the Project has been carried out throughout the design process. This has included non-statutory and statutory consultation as described in ES Chapter 1 (Doc Ref. 5.1) and in Section 8.21 of the Planning Statement (Doc Ref. 7.1). The pre-application consultation undertaken is documented within the Consultation Report (Doc Ref. 6.1) submitted with the application. As a result, communities and planning
	5.259	The Secretary of State will consider whether the applicant has engaged constructively with this community engagement board throughout the planning process.	

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			decision-makers, including Local Authorities, have been able to give proper consideration to the impacts of the Project and these matters are considered policy compliant.
Light Pollution	5.233	Where the development is subject to an Environmental Impact Assessment, the applicant should assess any likely significant effects on amenity from emissions of dust, odour, artificial light, smoke and steam, and describe these in the environmental statement.	The Operational Lighting Framework , forming ES Appendix 5.2.2 (Doc Ref. 5.3), describes the lighting proposals and demonstrates that the Project is below the acceptable limits set out for nuisance caused by lighting installation and would not therefore cause any undue loss of amenity. The document also outlines all of the consultation undertaken in appropriately informing its assessments. The Project is considered to be policy compliant in this regard.
	5.234	In particular, the assessment provided by the applicant should describe: <ul style="list-style-type: none"> • The type and quantity of emissions; • Aspects of the development which may give rise to emissions during construction, operation and decommissioning; • Premises or locations that may be affected by the emissions; • Effects of the emission on identified premises or locations; and • Measures to be employed in preventing or mitigating the emissions. 	
	5.235	The applicant is advised to consult the relevant local planning authority and, where appropriate, the Environment Agency, about the scope and methodology of the assessment.	
	5.236	The Secretary of State should ensure the applicant has provided sufficient information to show that any necessary mitigation will be put into place. In particular, the Secretary of State should consider whether to require the applicant to abide by a scheme of management and mitigation concerning emissions of dust, odour, artificial light, smoke and steam from the development to reduce any loss to amenity which might arise during the construction and operation of the development. A construction management plan may help clarify and secure mitigation.	
	5.237	The Secretary of State should be satisfied that all reasonable steps have been taken, and will be taken, to minimise any detrimental impact on amenity from emissions of dust, odour, artificial light, smoke and	

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		steam. This includes the impact of light pollution from artificial light on local amenity, intrinsically dark landscapes and nature conservation.	
	5.238	If development consent is granted for a project, the Secretary of State should consider whether there is a justification for all of the authorised project (including any associated development) being covered by a defence of statutory authority against nuisance claims. If the Secretary of State cannot conclude that this is justified, then the defence should be disapplied, in whole or in part, through a provision in the development consent order.	

Beyond The Horizon: The Future of UK Aviation – Making Best Use of Existing Runways			
Theme	Policy Reference	Policy Description	Compliance commentary
Principle of Development	1.25	As a result of the consultation and further analysis to ensure future carbon emissions can be managed, government believes there is a case for airports making best of their existing runways across the whole of the UK. The position is different for Heathrow Airport where the government’s policy on increasing capacity is set out in the proposed Airports NPS.	<p>Sections 3, 8 and 9 of the Planning Statement (Doc Ref. 7.1) and the Needs Case (Doc Ref. 7.2) justify the principle of making best use of the northern runway at Gatwick Airport. The Project would deliver additional airport capacity in the South East of England and is supported by a robust evidence base and is therefore considered to be compliant with this policy.</p> <p>It is recognised that expansion of the airport has the potential to increase the airport’s environmental effects, notwithstanding that the proposals seek to avoid or ameliorate those effects.</p> <p>The ES (Doc Ref. 5.1) addresses 13 separate environmental topics in addition to the in-combination and cumulative effects of the Project.</p> <p>The benefits and adverse impacts of the Project are discussed in Section 8 of the Planning Statement (Doc Ref. 7.1). They are then weighed against each other in Section 9 of the Planning Statement (Doc Ref. 7.1).</p>
	1.29	Therefore the government is supportive of airports beyond Heathrow making best use of their existing runways. However, we recognise that the development of airports can have negative as well as positive local impacts, including on noise levels. We therefore consider that any proposals should be judged by the relevant planning authority, taking careful account of all relevant considerations, particularly economic and environmental impacts and proposed mitigations. This policy statement does not prejudice the decision of those authorities who will be required to give proper consideration to such applications. It instead leaves it up to local, rather than national government, to consider each case on its merits.	
Air Quality	1.22	The government recognises the impact on communities living near airports and understands their concerns over local environmental issues,	Expansion of the airport has the potential to increase the airport’s

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Theme	Policy Reference	Policy Description	Compliance commentary
		particularly noise, air quality and surface access. As airports look to make the best use of their existing runways, it is important that communities surrounding those airports share in the economic benefits of this, and that adverse impacts such as noise are mitigated where possible.	<p>environmental effects, notwithstanding that the proposals seek to avoid or ameliorate those effects.</p> <p>The ES (Doc Ref. 5.1) addresses 13 separate environmental topics in addition to the in-combination and cumulative effects of the Project. ES Chapter 13 (Doc Ref. 5.1) details environmental effects and mitigation in respect of air quality in addressing this policy requirement.</p>
Noise and Vibration	1.22	The government recognises the impact on communities living near airports and understands their concerns over local environmental issues, particularly noise, air quality and surface access. As airports look to make the best use of their existing runways, it is important that communities surrounding those airports share in the economic benefits of this, and that adverse impacts such as noise are mitigated where possible.	<p>It is recognised that expansion of the airport has the potential to increase the airport’s environmental effects, notwithstanding that the proposals put forward seek to avoid or ameliorate those effects.</p> <p>The ES (Doc Ref. 5.1) addresses 13 separate environmental topics in addition to the in-combination and cumulative effects of the Project. ES Chapter 14 (Doc Ref. 5.1) principally details environmental effects and mitigation in respect of noise and vibration.</p> <p>Full details on the proposed noise insulation scheme and associated</p>

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Theme	Policy Reference	Policy Description	Compliance commentary
			community compensation, including details of consultation, fund sourcing, fund size and duration, eligibility and the means of delivering and securing the Project are set out in Section 8.20 of the Planning Statement (Doc Ref. 7.1).
	1.28	Given the likely increase in ATMs that could be achieved through making best use of existing runways is relatively small (2% increase in ATMs “without Heathrow expansion” scenario; 1% “with Heathrow”), we do not expect that the policy will have significant implications for our overall airspace capacity. However it is important to note that any flightpath changes required as a result of a development at an airport will need to follow the CAA’s airspace change process. This includes full assessment of the likely environmental impacts, consideration of options to mitigate these impacts, and the need to consult with stakeholders who may be affected. Approval for the proposed airspace change will only be granted once the CAA has been satisfied that all aspects, including safety, have been addressed. In addition, government has committed to establish an Independent Commission on Civil Aviation Noise (ICCAN) to help ensure that the noise impacts of airspace changes are properly considered and give communities a greater stake in noise management.	Noise matters are addressed in ES Chapters 8 and 14 (Doc Ref. 5.1) as follows; <ul style="list-style-type: none"> - assessment years for identifying the likely significant effect of air noise are set out in Section 14.6; - a description of the noise sources included in the assessment are set out in Sections 14.4 and 14.5; - the assessment of significant effects covering the identified source of noise and vibration are described in Section 14.9; - the effect of noise on sensitive landscape and visual receptors is covered in ES Chapter 8 (Doc Ref 5.1);

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Theme	Policy Reference	Policy Description	Compliance commentary
			<ul style="list-style-type: none"> - the assessment of effects due to construction activities and changes to the noise environment as a result of the Project is provided in Section 14.9; - the mitigation measures to address noise effects, as well as the Noise Envelope, are described in Section 14.8; and - best practice construction noise mitigation measures are secured through the Code of Construction Practice (CoCP) provided as ES Appendix 5.3.2 (Doc Ref. 5.3); - Full details on the proposed noise insulation scheme and associated community compensation, including details of consultation, fund sourcing, fund size and duration, eligibility and the means of delivering and securing the Project are set out in Section 8.20 of the Planning Statement (Doc Ref. 7.1).

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Theme	Policy Reference	Policy Description	Compliance commentary
Traffic and Transport	1.22	The government recognises the impact on communities living near airports and understands their concerns over local environmental issues, particularly noise, air quality and surface access. As airports look to make the best use of their existing runways, it is important that communities surrounding those airports share in the economic benefits of this, and that adverse impacts such as noise are mitigated where possible.	<p>The Transport Assessment (TA) (Doc Ref. 7.4) and the Surface Access Commitments (SACs) forming ES Appendix 5.4.1 (Doc Ref. 5.3) form part of the documentation for the application for development consent. The documents show the predicted level of trips by the range of travel modes, which are based on specific targets for maximising the proportion of journeys made by non-car modes. Predicted traffic flows on the highway network in the vicinity of the airport are presented in ES Appendix 12.9.1: Highway Flows and Driver Delay Review (Doc Ref. 5.3). These flows reflect the targets that have been adopted to achieve the mode shift.</p> <p>A summary of the Surface Access Commitments (SACs) is provided in Section 12.8 of ES Chapter 12 (Doc Ref. 5.1) and in more detail in the Surface Access Commitments forming ES Appendix 5.4.1 (Doc Ref. 5.3). Based on the above, these matters are considered policy compliant.</p>

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Theme	Policy Reference	Policy Description	Compliance commentary
Safety and Security	1.28	<p>Given the likely increase in ATMs that could be achieved through making best use of existing runways is relatively small (2% increase in ATMs “without Heathrow expansion” scenario; 1% “with Heathrow”), we do not expect that the policy will have significant implications for our overall airspace capacity. However it is important to note that any flightpath changes required as a result of a development at an airport will need to follow the CAA’s airspace change process. This includes full assessment of the likely environmental impacts, consideration of options to mitigate these impacts, and the need to consult with stakeholders who may be affected. Approval for the proposed airspace change will only be granted once the CAA has been satisfied that all aspects, including safety, have been addressed. In addition, government has committed to establish an Independent Commission on Civil Aviation Noise (ICCAN) to help ensure that the noise impacts of airspace changes are properly considered and give communities a greater stake in noise management.</p>	<p>The potential risks to safety in the event of a Major Accidents & Disasters (MA&D) during construction and operation of the Project across the study area have been assessed within ES Appendix 5.3.4: Major Accidents and Disasters (Doc Ref. 5.3).</p> <p>Hazards that may pose a risk to the safety of sensitive receptors have been assessed and conclusions on the significance of the risk determined. The results of the assessment of hazards and significance of the risks are outlined in ES Chapter 18 (Doc Ref. 5.1) and in Section 8.17 of the Planning Statement (Doc Ref. 7.1).</p>
Community Engagement	1.24	<p>As part their planning applications airports will need to demonstrate how they will mitigate local environmental issues, which can then be presented to, and considered by, communities as part of the planning consultation process. This ensures that local stakeholders are given appropriate opportunity to input into potential changes which affect their environment and have their say on airport applications.</p>	<p>Engagement on the Project has been carried out throughout the design process. This has included non-statutory and statutory consultation as described in ES Chapter 1 (Doc Ref. 5.1) and in Section 8.21 of the Planning Statement (Doc Ref. 7.1). The pre-application consultation undertaken is documented within the Consultation Report (Doc Ref. 6.1) submitted with the application. As a result, communities and planning decision-makers, including Local Authorities, have been able to give</p>

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Theme	Policy Reference	Policy Description	Compliance commentary
			proper consideration to the impacts of the Project and these matters are considered policy compliant.

Flightpath To The Future			
Theme	Policy Reference	Policy Description	Compliance commentary
Principle of Development	3	Support growth in airport capacity where it is justified, ensuring that capacity is used in a way that delivers for the UK – airport expansion has a key role to play in enhancing the UK’s global connectivity and we remain supportive of sustainable airport growth. We will also support the sector to drive forward continued quality improvements, so slot capacity is used effectively and delivers the best possible results for the UK. An important aspect of this will be carrying out a detailed review of the airport slot allocation system to look at how we can improve it. This will ensure that the system meets the needs of the UK now that we have left the European Union, and we will consult on this shortly.	<p>Sections 3, 8 and 9 of the Planning Statement (Doc Ref. 7.1) and the Needs Case (Doc Ref. 7.2) justify the principle of making best use of the northern runway at Gatwick Airport. The Project would deliver additional airport capacity in the South East of England and is supported by a robust evidence base and is therefore considered to be compliant with this policy.</p> <p>A detailed review of the airport slot allocation system has informed the Project; this is included within Section 7.3 of the Needs Case (Doc Ref. 7.2).</p> <p>The benefits and adverse impacts of the Project are discussed in Section 8 of the Planning Statement (Doc Ref. 7.1). They are then weighed against each other in Section 9 of the Planning Statement (Doc Ref. 7.1).</p>

Flightpath To The Future			
Theme	Policy Reference	Policy Description	Compliance commentary
Socio-economics	6	<p>Unlock local benefits and level up – recognise how our extensive airport, airfield and aviation infrastructure network acts as a catalyst for national and local benefits. This includes through trade, air freight, aerospace, investment and tourism, as well as allowing people to benefit from improved connections across the union and regions. We are bolstering air connectivity within the union through a 50% cut in domestic Air Passenger Duty (APD), while further aligning APD with UK environmental objectives by adding a new ultra-long-haul distance band. We will also support routes that are in danger of being lost, through our Public Service Obligation policy for domestic aviation. Where journeys are too long to be reasonably taken by road or rail, our PSO policy can provide support. As part of the independent Union Connectivity Review there were recommendations on PSO policy which will be carefully considered as part of the Government’s response. Airport expansion also has a key role to play in unlocking benefits to the UK and levelling up. Our existing policy frameworks on airport planning provide a robust and balanced framework for sustainable growth, and continue to have full effect.</p>	<p>The Needs Case (Doc Ref. 7.2) addresses this and ES Chapter 17 (Doc Ref. 5.1) presents the assessment of effects relating to economics and employment. The Project is anticipated to bring about significant benefits to the local economy and to improve the UK’s air connectivity.</p> <p>The application includes an Employment, Skills and Business Strategy at ES Appendix 17.8.1 (Doc Ref. 5.3) which sets out measures to enable the local workforce to attain skills relevant to employment opportunities arising from airport growth and which will ensure that the local area benefits from new employment opportunities.</p>

Jet Zero Strategy			
Theme	Policy Reference	Policy Description	Compliance commentary
Principle of Development	3.7	We will support airspace modernisation, providing £9.2m funding between 2020-2023 to drive forward progress in redesigning the UK's 'motorways in the sky' with the aim to deliver quicker, quieter, and cleaner journeys for those who use and are affected by UK airspace. From 2020 we supported sponsors to continue through stage 2 of the airspace change process. In January 2022, we announced a further £3.7m to continue this support, helping airports develop more efficient flight routes that make use of modern technology, such as performance-based navigation.	<p>Sections 3, 8 and 9 of the Planning Statement (Doc Ref. 7.1) and the Needs Case (Doc Ref. 7.2) justify the principle of making best use of the northern runway at Gatwick Airport. The Project would deliver additional airport capacity in the South East of England and is supported by a robust evidence base and is therefore considered to be in keeping with the aspirations of this policy.</p> <p>The benefits and adverse impacts of the Project are discussed in Section 8 of the Planning Statement (Doc Ref. 7.1). They are then weighed against each other in Section 9 of the Planning Statement (Doc Ref. 7.1).</p>
	3.12	We will ensure that operational improvements are made wherever possible and that the appropriate forums are used to consider these. There are a number of potential improvements in operations which may not be fully covered by other policies, such as formation flight, differential airspace charging for more efficient aircraft, and advanced airport operations, which will need collaboration between different parts of the sector to deliver. We will continue to track such developments and ensure they are being addressed by industry through ongoing engagement with industry working groups and the CAA. This will include continued support to the work of Sustainable Aviation and addressing issues around new operational requirements for zero emissions aircraft through the Jet Zero Council's Zero Emission Flight Delivery Group.	
	3.56	The Government remains committed to growth in the aviation sector and working with industry to ensure a sustainable recovery from the pandemic. In our recently published strategic framework for the future of aviation – 'Flightpath to the Future' – we recognise that airport expansion has a role to play in realising benefits for the UK through boosting our global connectivity and levelling up. The framework is clear that we continue to be supportive of airport growth where it is justified, and our existing policy frameworks for airport	

Jet Zero Strategy			
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		planning provide a robust and balanced framework for airports to grow sustainably within our strict environmental criteria. We have also been clear expansion of any airport in England must meet our climate change obligations to be able to proceed.	
Climate Change and Greenhouse Gases	3.5	Our ambition remains for all airport operations in England to be zero emission by 2040. Whilst airport operations account for a relatively small percentage of total aviation emissions, it is right to place more ambitious targets on airports, reflecting that the aviation sector will face difficulties to reduce emissions overall. It is also an area where significant co-benefits, especially when combined with the introduction of new generation aircraft, can be realised by reducing local air pollution and noise for local communities. The Mott MacDonald Feasibility of Zero Emissions Airport Operations in England by 2040 report provides an early indication of the extent to which certain airport activities can be decarbonised by 2040 and highlights that our ambition can be achieved.	<p>It is recognised that expansion of the airport has the potential to increase the airport's environmental effects, notwithstanding that the proposals put forward will seek to avoid or ameliorate those effects.</p> <p>The ES (Doc Ref. 5.1) addresses 13 separate environmental topics in addition to the in-combination and cumulative effects of the Project.</p>
	3.8	We will support ACOG, together with the CAA, to ensure carbon savings are realised as part of the wholesale changes to UK airspace being developed as part of the Airspace Change Masterplan25, and plans for airspace modernisation account for the introduction of zero emission aircraft. In January 2022, the CAA published ACOG's Airspace Change Masterplan Iteration 226. With the programme still in its relatively early stages, Iteration 2 of the Masterplan provides a system-wide view of when, where, and why changes are needed and the sequence of those changes. It describes how and where environmental inefficiency occurs in the current system (such as aircraft following longer flight paths and suboptimal climb and descent profiles), which helps determine the four regional clusters for optimisation to ensure emissions savings are realised. It is estimated that the first two clusters of airspace changes will begin deployment in 2025, with the last, most complex cluster around London airspace estimated to begin deployment around 2027.	<p>The assessment methodology outlined in ES Chapter 15 (Doc Ref. 5.1) includes identification of climate change impacts including UKCP18 (the latest set of UK climate projections) reflecting a number of time periods, covering the lifetime of the Project, as described in Section 15.5 of ES Chapter 15 (Doc Ref. 5.1). In Section 15.8 of ES Chapter 15 (Doc Ref. 5.1), it is set out how embedded environmental measures will be implemented in relation to climate change. The overall impacts arising from the Project are not so significant that the Project would</p>

Jet Zero Strategy			
Theme	Policy Reference	Policy Description	Compliance commentary
		Further iterations of the Masterplan will give more detail of the system wide impacts in terms of environmental goals, with the third iteration due towards the beginning of 2023.	have a material impact on the ability of Government to meet its carbon reduction targets, including Carbon Budgets, accordingly the Project complies with policy.
	3.57	Our approach to sustainable growth is supported by our analysis (set out in the supporting analytical document) which shows that we can achieve Jet Zero without the Government needing to intervene directly to limit aviation growth. The analysis uses updated airport capacity assumptions consistent with the latest known expansion plans at airports in the UK. The analysis indicates that it is possible for the potential carbon emissions resulting from these expansion schemes to be accommodated within the planned trajectory for achieving net zero emissions by 2050, and consequently that our planning policy frameworks remain compatible with the UK's climate change obligations.	
	3.61	We will support airport growth where it can be delivered within our environmental obligations. The aviation sector is important for the whole of the UK economy in terms of connectivity, direct economic activity, trade, investment, and jobs. Before COVID-19, it facilitated £95.2 billion of UK's non-EU trade exports; contributed at least £22 billion directly to GDP; directly provided at least 230,000 jobs across all regions of the country and underpins the competitiveness and global reach of our national and our regional economies. We are committed to enabling a green recovery of the sector, as well as sustainable growth in the coming years. The Government's existing planning policy frameworks, along with the Jet Zero Strategy and the Flightpath to the Future strategic framework for aviation, have full effect and are material considerations in the statutory planning process for proposed airport development.	
	3.68	We will work closely with atmospheric scientists, other researchers, industry and internationally to better understand the science and potential mitigations of non-CO2 impacts from aviation. Furthermore, we	

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		will carefully consider any need for additional research and development activity on non-CO2, including working with UK Research and Innovation (UKRI). We are also committed to working through ICAO to lead research into the non-CO2 impacts of international aviation and their mitigation. As the evidence base develops we will support the consideration of appropriate international measures to address non-CO2 impacts alongside reducing CO2 emissions.	
Community Engagement	3.62	It is vital that local communities and the wider public have confidence that the impacts of airport expansion have been properly considered. Applicants should therefore provide sufficient detail regarding the likely environmental and other effects of airport development to enable communities and planning decision-makers to give these impacts proper consideration. Applicants should engage with the relevant planning authority at an early stage of the planning process to agree an appropriate approach.	Engagement on the Project has been carried out throughout the design process. This has included non-statutory and statutory consultation as described in ES Chapter 1 (Doc Ref. 5.1) and in Section 8.21 of the Planning Statement (Doc Ref. 7.1). The pre-application consultation undertaken is documented within the Consultation Report (Doc Ref. 6.1) submitted with the application. As a result, communities and planning decision-makers, including Local Authorities, have been able to give proper consideration to the impacts of the Project and these matters are considered policy compliant.
	3.63	Planning authorities and applicants should consider all relevant policy, guidance and other material considerations that may assist appraisal for airport development proposals and decision-making. Applicants should clearly set out their approach and findings in an accessible way that can be easily understood by the general public and decision-makers. The Government recognises the importance of a clear and consistent approach in relation to the assessment of a development's impacts in the process, and will keep under review whether further guidance is needed to assist airport planning decision-making, with particular reference to environmental impacts.	

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Air Quality	5.6	Where the impacts of the project (both on and off-scheme) are likely to have significant air quality effects in relation to meeting EIA requirements and / or affect the UKs ability to comply with the Air Quality Directive, the applicant should undertake an assessment of the impacts of the proposed project as part of the environmental statement.	In accordance with the policy requirement, the ES includes an assessment of existing air quality levels for all pollutants at risk of exceeding the air quality limit values in the study area. For detail of the air quality baseline, please see baseline information provided in Section 13.7 of ES Chapter 13 (Doc Ref. 5.1). The assessment forecasts levels for all relevant air quality pollutants at the time of opening, with and without the Project in operation. A summary of impacts has been provided in Section 13.10 of ES Chapter 13 (Doc Ref. 5.1). The assessment determines the significance of effects from all Project related activities (both construction and operation). See ES Appendix 13.4.1: Air Quality Assessment Methodology (Doc Ref. 5.3) for the methodology. A summary of impacts has been provided in Section 13.10 of ES Chapter 13 (Doc Ref. 5.1).
	5.7	The environmental statement should describe: <ul style="list-style-type: none"> existing air quality levels; forecasts of air quality at the time of opening, assuming that the scheme is not built (the future baseline) and taking account of the impact of the scheme; and 	Relevant and recent data from DEFRA has been used for the assessment of air quality impacts arising from the Project. This can be found in Section 13.10 of ES Chapter 13 (Doc Ref. 5.1).

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		<ul style="list-style-type: none"> any significant air quality effects, their mitigation and any residual effects, distinguishing between the construction and operation stages and taking account of the impact of road traffic generated by the project. 	
	5.8	Defra publishes future national projections of air quality based on evidence of future emissions, traffic and vehicle fleet. Projections are updated as the evidence base changes. Applicant's assessment should be consistent with this but may include more detailed modelling to demonstrate local impacts.	Compliance with the Air Quality Framework Directive is covered in Section 13.2 of ES Chapter 13 (Doc Ref. 5.1) and assessed in Section 13.10 of ES Chapter 13 (Doc Ref. 5.1). The results show that the Project is predicted to be compliant with the air quality standards. The Project is therefore considered to be policy compliant.
	5.9	In addition to information on the likely significant effects of a project in relation to EIA, the Secretary of State must be provided with a judgement on the risk as to whether the project would affect the UK's ability to comply with the Air Quality Directive.	These matters are assessed in Section 13.4 of ES Chapter 13 (Doc Ref. 5.1) and the impact to air quality has been assessed accordingly in Section 13.10 of ES Chapter 13 (Doc Ref. 5.1), with mitigation measures set out in Section 13.9 of ES Chapter 13 (Doc Ref. 5.1). On that basis, the assessment concludes that no significant air quality effects are predicted as a result of the Project.
	5.10	The Secretary of State should consider air quality impacts over the wider area likely to be affected, as well as in the near vicinity of the scheme. In all cases the Secretary of State must take account of relevant statutory air quality thresholds set out in domestic and European legislation. Where a project is likely to lead to a breach of the air quality thresholds, the applicant should work with the relevant authorities to secure	The range of mitigation measures proposed in relation to air quality are described in Section 13.9 of ES Chapter 13 (Doc Ref. 5.1). Additionally, there is the Code of Construction Practice (CoCP) provided as ES

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		appropriate mitigation measures with a view to ensuring so far as possible that those thresholds are not breached.	Appendix 5.3.2 (Doc Ref. 5.3) which outlines further mitigation and good practice measures during the construction and operational assessment phases of the Project. Together, these elements demonstrate the compliance of the Project with this policy.
	5.11	Air quality considerations are likely to be particularly relevant where schemes are proposed: <ul style="list-style-type: none"> • within or adjacent to Air Quality Management Areas (AQMA); roads identified as being above Limit Values or nature conservation sites (including Natura 2000 sites and SSSIs, including those outside England); and • where changes are sufficient to bring about the need for a new AQMA or change the size of an existing AQMA; or bring about changes to exceedences of the Limit Values, or where they may have the potential to impact on nature conservation sites. 	
	5.12	The Secretary of State must give air quality considerations substantial weight where, after taking into account mitigation, a project would lead to a significant air quality impact in relation to EIA and / or where they lead to a deterioration in air quality in a zone/agglomeration	
	5.13	The Secretary of State should refuse consent where, after taking into account mitigation, the air quality impacts of the scheme will: <ul style="list-style-type: none"> • result in a zone/agglomeration which is currently reported as being compliant with the Air Quality Directive becoming non-compliant; or • affect the ability of a non-compliant area to achieve compliance within the most recent timescales reported to the European Commission at the time of the decision. 	
	5.14	The Secretary of State should consider whether mitigation measures put forward by the applicant are acceptable. A management plan may help codify mitigation at this stage. The proposed mitigation measures should ensure that the net impact of a project does not delay the point at which a zone will meet compliance timescales.	
	5.15	Mitigation measures may affect the project design, layout, construction, operation and/or may comprise measures to improve air quality in	

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		pollution hotspots beyond the immediate locality of the scheme. Measures could include, but are not limited to, changes to the route of the new scheme, changes to the proximity of vehicles to local receptors in the existing route, physical means including barriers to trap or better disperse emissions and speed control. The implementation of mitigation measures may require working with partners to support their delivery.	
	5.84	Where the development is subject to an Environmental Impact Assessment, the applicant should assess any likely significant effects on amenity from emissions of odour, dust, steam, smoke and artificial light and describe these in the Environmental Statement.	
	5.85	In particular, the assessment provided by the applicant should describe: <ul style="list-style-type: none"> the type and quantity of emissions; aspects of the development which may give rise to emissions during construction, operation and decommissioning; premises or locations that may be affected by the emissions; effects of the emission on identified premises or locations; and measures to be employed in preventing or mitigating the emissions. 	
	5.86	The applicant is advised to consult the relevant local planning authority and, where appropriate, the Environment Agency about the scope and methodology of the assessment.	
	5.87	The Secretary of State should be satisfied that all reasonable steps have been taken, and will be taken, to minimise any detrimental impact on amenity from emissions of odour, dust, steam, smoke and artificial light. This includes the impact of light pollution from artificial light on local amenity, intrinsically dark landscapes and nature conservation.	
	5.88	If development consent is granted for a project, the Secretary of State should consider whether there is a justification for all of the authorized project (including any associated development) being covered by a defence of statutory authority against nuisance claims. If the Secretary of State cannot conclude that this is justified, then the defence should be	

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		disapplied, in whole or in part, through a provision in the Development Consent Order.	
	5.89	The Secretary of State should ensure the applicant has provided sufficient information to show that any necessary mitigation will be put into place. In particular, the Secretary of State should consider whether to require the applicant to abide by a scheme of management and mitigation concerning emissions of odour, dust, steam, smoke, artificial light from the development to reduce any loss to amenity which might arise during the construction and operation of the development. A construction management plan may help codify mitigation.	
Ecology and Nature Conservation	5.22	Where the project is subject to EIA the applicant should ensure that the environmental statement clearly sets out any likely significant effects on internationally, nationally and locally designated sites of ecological or geological conservation importance (including those outside England) on protected species and on habitats and other species identified as being of principal importance for the conservation of biodiversity and that the statement considers the full range of potential impacts on ecosystems.	Ecological assessments have been conducted and are contained in ES Appendix 9.6.1: Ecological Desk Study (Doc Ref. 5.3) and ES Appendix 9.6.2: Ecology Survey Report (Doc Ref. 5.3) and detailed in Section 9.6 of ES Chapter 9 (Doc Ref. 5.1).
	5.23	The applicant should show how the project has taken advantage of opportunities to conserve and enhance biodiversity and geological conservation interests.	The Project's embedded and good practice mitigation measures are detailed in Section 9.8 of ES Chapter 9 (Doc Ref. 5.1).
	5.24	The Government's biodiversity strategy is set out in Biodiversity 2020: A Strategy for England's wildlife and ecosystem services. Its aim is to halt overall biodiversity loss, support healthy well-functioning ecosystems and establish coherent ecological networks, with more and better places for nature for the benefit of wildlife and people. This aim needs to be viewed in the context of the challenge of climate change: failure to address this challenge will result in significant impact on biodiversity.	The measures detailed within Section 9.8 of ES Chapter 9 (Doc Ref. 5.1) have been designed to ensure that impacts of the Project on ecological receptors are avoided, reduced or mitigated where effects are unavoidable and that the Project has been designed to achieve Biodiversity Net Gain (BNG).
	5.25	As a general principle, and subject to the specific policies below, development should avoid significant harm to biodiversity and geological conservation interests, including through mitigation and consideration of	The BNG

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		reasonable alternatives. The applicant may also wish to make use of biodiversity offsetting in devising compensation proposals to counteract any impacts on biodiversity which cannot be avoided or mitigated. Where significant harm cannot be avoided or mitigated, as a last resort, appropriate compensation measures should be sought.	<p>proposals are set out within ES Appendix 9.9.2: Biodiversity Net Gain Statement (Doc Ref. 5.3). Detailed Ecological Mitigation strategies in relation to bats and badgers are set out in ES Appendix 9.6.3: Bat Trapping and Radio Tracking Surveys (Doc Ref. 5.3) and ES Appendix 9.6.4: Confidential Badger Survey (Doc Ref. 5.3).</p> <p>In accordance with the policy requirement, Section 9.9 of ES Chapter 9 (Doc Ref. 5.1) provides an assessment of the potential effects that the Project will have on designated nature conservation sites, habitats and species. The assessment reflects the principles of Biodiversity 2020: A Strategy for England's wildlife and ecosystem services. These effects are summarised in Section 9.13 of ES Chapter 9 (Doc Ref. 5.1).</p>
	5.26	In taking decisions, the Secretary of State should ensure that appropriate weight is attached to designated sites of international, national and local importance, protected species, habitats and other species of principal importance for the conservation of biodiversity, and to biodiversity and geological interests within the wider environment.	
	5.31	Sites of regional and local biodiversity and geological interest (which include Local Geological Sites, Local Nature Reserves and Local Wildlife Sites and Nature Improvement Areas) have a fundamental role to play in meeting overall national biodiversity targets, in contributing to the quality of life and the well-being of the community, and in supporting research and education. The Secretary of State should give due consideration to such regional or local designations. However, given the need for new infrastructure, these designations should not be used in themselves to refuse development consent.	
	5.32	Ancient woodland is a valuable biodiversity resource both for its diversity of species and for its longevity as woodland. Once lost it cannot be recreated. The Secretary of State should not grant development consent for any development that would result in the loss or deterioration of irreplaceable habitats including ancient woodland and the loss of aged or veteran trees found outside ancient woodland, unless the national need for and benefits of the development, in that location, clearly outweigh the loss. Aged or veteran trees found outside ancient woodland are also particularly valuable for biodiversity and their loss should be avoided. ⁷⁹ Where such trees would be affected by development proposals, the	

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		applicant should set out proposals for their conservation or, where their loss is unavoidable, the reasons for this.	
	5.33	Development proposals potentially provide many opportunities for building in beneficial biodiversity or geological features as part of good design. When considering proposals, the Secretary of State should consider whether the applicant has maximised such opportunities in and around developments. The Secretary of State may use requirements or planning obligations where appropriate in order to ensure that such beneficial features are delivered.	
	5.34	Many individual wildlife species receive statutory protection under a range of legislative provisions.	
	5.35	Other species and habitats have been identified as being of principal importance for the conservation of biodiversity in England and Wales and therefore requiring conservation action. The Secretary of State should ensure that applicants have taken measures to ensure these species and habitats are protected from the adverse effects of development. Where appropriate, requirements or planning obligations may be used in order to deliver this protection. The Secretary of State should refuse consent where harm to the habitats or species and their habitats would result, unless the benefits of the development (including need) clearly outweigh that harm.	
	5.36	Applicants should include appropriate mitigation measures as an integral part of their proposed development, including identifying where and how these will be secured. In particular, the applicant should demonstrate that: <ul style="list-style-type: none"> during construction, they will seek to ensure that activities will be confined to the minimum areas required for the works; during construction and operation, best practice will be followed to ensure that risk of disturbance or damage to species or habitats is 	

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		<p>minimised (including as a consequence of transport access arrangements);</p> <ul style="list-style-type: none"> • habitats will, where practicable, be restored after construction works have finished; • developments will be designed and landscaped to provide green corridors and minimise habitat fragmentation where reasonable; • opportunities will be taken to enhance existing habitats and, where practicable, to create new habitats of value within the site landscaping proposals, for example through techniques such as the 'greening' of existing network crossing points, the use of green bridges and the habitat improvement of the network verge. 	<p>adopted as part of the Project include measures to protect and minimise the potential for effects on biodiversity including habitat creation around the Project site, which would contribute to the overall effect in relation to biodiversity.</p> <p>Biodiversity Net Gain calculations are provided in the Biodiversity Net Gain Statement comprising ES Appendix 9.9.2 (Doc Ref. 5.3).</p>
	5.38	<p>The Secretary of State will need to take account of what mitigation measures may have been agreed between the applicant and Natural England and/or the MMO, and whether Natural England and/or the MMO has granted or refused, or intends to grant or refuse, any relevant licences, including protected species mitigation licences.</p>	<p>Detailed Ecological Mitigation strategies in relation to bats and badgers are set out in ES Appendix 9.6.3: Bat Trapping and Radio Tracking Surveys (Doc Ref. 5.3) and ES Appendix 9.6.4: Confidential Badger Survey (Doc Ref. 5.3).</p> <p>The assessment demonstrates the Project complies with the policy.</p>
Climate Change and Greenhouse Gases	3.2	<p>The Government recognises that for development of the national road and rail networks to be sustainable these should be designed to minimise social and environmental impacts and improve quality of life.</p>	<p>The impacts of climate change on the Project are considered and have been throughout the sifting and optioneering planning stages as presented in ES Chapter 3 (Doc Ref. 5.1). The Climate Change Resilience (CCR) assessment covered in ES Chapter 15 (Doc Ref. 5.1) covers design, build (construction)</p>
	4.40	<p>New national networks infrastructure will be typically long-term investments which will need to remain operational over many decades, in the face of a changing climate. Consequently, applicants must consider the impacts of climate change when planning location, design, build and operation. Any accompanying environment statement should</p>	

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		set out how the proposal will take account of the projected impacts of climate change.	and operation and identifies mitigation measures to ensure Climate Change resilience including design principles that account for extreme temperature events and water stress. The Project has been assessed as being policy compliant.
	4.41	Where transport infrastructure has safety-critical elements and the design life of the asset is 60 years or greater, the applicant should apply the UK Climate Projections 2009 (UKCP09) high emissions scenario (high impact, low likelihood) against the 2080 projections at the 50% probability level.	Consistent with the policy requirement, the assessment set out in Section 15.9 of ES Chapter 15 (Doc Ref. 5.1) considers various scenarios for Greenhouse Gas (GHG) emissions to assess the impact of climate change over the lifetime of the Project. For this reason, Representative Concentration Pathways (RCP), as described in Section 15.2 of ES Chapter 15 (Doc Ref. 5.1) have been used. RCP 8.5 is the highest emissions scenario available on UKCP18, representing a global temperature increase of approximately 4.3 degrees Celsius by 2100, relative to pre-industrial temperatures.
	4.42	The applicant should take into account the potential impacts of climate change using the latest UK Climate Projections available at the time and ensure any environment statement that is prepared identifies appropriate mitigation or adaptation measures. This should cover the estimated lifetime of the new infrastructure. Should a new set of UK Climate Projections become available after the preparation of any environment statement, the Examining Authority should consider whether they need to request additional information from the applicant.	The assessment methodology outlined in ES Chapter 15 (Doc Ref. 5.1) includes identification of climate change impacts including UKCP18 (the latest set of UK climate projections) reflecting a number of time periods, covering the lifetime of the Project, as described in Section 15.5 of ES Chapter 15 (Doc

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			Ref. 5.1). In Section 15.8 of ES Chapter 15 (Doc Ref. 5.1), it is set out how embedded environmental measures will be implemented in relation to climate change, in accordance with policy.
	4.43	The applicant should demonstrate that there are no critical features of the design of new national networks infrastructure which may be seriously affected by more radical changes to the climate beyond that projected in the latest set of UK climate projections. Any potential critical features should be assessed taking account of the latest credible scientific evidence on, for example, sea level rise (e.g. by referring to additional maximum credible scenarios such as from the Intergovernmental Panel on Climate Change or Environment Agency) and on the basis that necessary action can be taken to ensure the operation of the infrastructure over its estimated lifetime through potential further mitigation or adaptation.	<p>In line with the ANPS, more radical changes to the climate beyond those projected in the latest set of UKCP18 have been assessed in Section 15.5 of ES Chapter 15 (Doc Ref. 5.1) using plausible higher and lower end climate change projections from both the H++/L—scenarios, and the UKCP18 probabilistic projections of climate extremes.</p> <p>With the limitations and uncertainties of the data available on future climate change projections as outlined in Section 15.6 of ES Chapter 15 (Doc Ref. 5.1), critical features of infrastructure have been assessed consistent with the requirement prescribed by policy.</p>
	4.44	Any adaptation measures should be based on the latest set of UK Climate Projections, the Government’s national Climate Change Risk Assessment and consultation with statutory consultation bodies. Any adaptation measures must themselves also be assessed as part of any environmental impact assessment and included in the environment	Consideration of the UK Climate Change Risk Assessment in the methodology is described in Section 15.5 of ES Chapter 15 (Doc Ref. 5.1). Section 15.3 of ES Chapter 15 (Doc Ref. 5.1) sets out the responses to comments received

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		statement, which should set out how and where such measures are proposed to be secured.	from the Planning Inspectorate via the Scoping Opinion as well as engagement with statutory consultation bodies and other key stakeholders. Mitigation measures have been developed to manage risks and these are described in Section 15.8 of ES Chapter 15 (Doc Ref 5.1). The Project is considered to be policy compliant.
	4.45	If any proposed adaptation measures themselves give rise to consequential impacts the Secretary of State should consider the impact in relation to the application as a whole and the impacts guidance set out in this part of this NPS (e.g. on flooding, water resources, biodiversity, landscape and coastal change).	The consequential impacts of embedded mitigation for other environmental aspects (e.g. on health and wellbeing) have been assessed in individual topic chapters within the ES (Doc Ref. 5.1). Mitigation identified for climate change has been recorded in Table 15.8.4 and Table 15.9.1 within ES Chapter 15 (Doc Ref. 5.1) for the CCR Assessment and for the ICCI Assessment, respectively.
	4.46	Adaptation measures can be required to be implemented at the time of construction where necessary and appropriate to do so.	Elements of the design have been developed to account for climate change adaption and would be implemented at the time of construction. These are captured within the Design and Access Statement (Doc Ref. 7.3) as Outline Climate Resilience Design Principles and measures.
	4.47	Where adaptation measures are necessary to deal with the impact of climate change, and that measure would have an adverse effect on other aspects of the project and/or surrounding environment (e.g. coastal	Several mitigation measures are already embedded within the design of the Project. Further mitigation measures are

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		processes), the Secretary of State may consider requiring the applicant to ensure that the adaptation measure could be implemented should the need arise, rather than at the outset of the development (e.g. reserving land for future extension, increasing the height of an existing sea wall, or requiring a new sea wall).	necessary for four key areas (overheating in buildings during construction, dealing with extreme events during construction, overheating in buildings during operation and water stress during operation). These are identified within the Design and Access Statement (Doc Ref. 7.3). Should other climate risks become significant in the future, the Climate Change Resilience Assessment which forms ES Appendix 15.8.1 (Doc Ref. 5.3) suggests additional mitigation should the need arise.
	5.17	Carbon impacts will be considered as part of the appraisal of scheme options (in the business case), prior to the submission of an application for DCO. Where the development is subject to EIA, any Environmental Statement will need to describe an assessment of any likely significant climate factors in accordance with the requirements in the EIA Directive. It is very unlikely that the impact of a road project will, in isolation, affect the ability of Government to meet its carbon reduction plan targets. However, for road projects applicants should provide evidence of the carbon impact of the project and an assessment against the Government's carbon budgets.	Appropriate mitigation measures have been considered in the embedded and additional measures to mitigate GHG emissions from the construction and operation of the Project and these are presented in Section 16.8 and Section 16.10 of ES Chapter 16 (Doc Ref. 5.1). These measures comprise commitments to achieving specific levels of lower emission transport modes for passengers and staff accessing the airport and to a carbon budget for construction, surface access and aviation processes. These commitments have been collated into the Carbon Action Plan and the Surface Access Commitments , respectively comprising
	5.18	The Government has an overarching national carbon reduction strategy (as set out in the Carbon Plan 2011) which is a credible plan for meeting carbon budgets. It includes a range of non-planning policies which will, subject to the occurrence of the very unlikely event described above, ensure that any carbon increases from road development do not compromise its overall carbon reduction commitments. The Government is legally required to meet this plan. Therefore, any increase in carbon	

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		emissions is not a reason to refuse development consent, unless the increase in carbon emissions resulting from the proposed scheme are so significant that it would have a material impact on the ability of Government to meet its carbon reduction targets.	ES Appendices 5.4.2 and 5.4.1 (Doc Ref. 5.3).
	5.19	Evidence of appropriate mitigation measures (incorporating engineering plans on configuration and layout, and use of materials) in both design and construction should be presented. The Secretary of State will consider the effectiveness of such mitigation measures in order to ensure that, in relation to design and construction, the carbon footprint is not unnecessarily high. The Secretary of State's view of the adequacy of the mitigation measures relating to design and construction will be a material factor in the decision making process.	GHG emissions impacts for each of the required emissions sources are presented in Section 16.9 of ES Chapter 16 (Doc Ref. 5.1). The construction and operational (Greenhouse Gas) GHG impact of the Project is set out in Section 16.9 of ES Chapter 16 (Doc Ref. 5.1). This section also includes an assessment of the impact of the Project against the Government's carbon obligations. In these respects the Project is compliant with policy.
Historic Environment	5.126	Where the development is subject to EIA the applicant should undertake an assessment of any likely significant heritage impacts of the proposed project as part of the Environmental Impact Assessment and describe these in the environmental statement.	The description of the significance of the assets affected by the Project, and the contribution of their setting to that significance, is summarised within Section 7.6 of ES Chapter 7 (Doc Ref. 5.1) and presented within an appropriate desk-based assessment and a summary of the results of field evaluations formed of the Historic Environment Baseline Report comprising ES Appendix 7.6.1 (Doc Ref. 5.3). The same Appendix also
	5.127	The applicant should describe the significance of any heritage assets affected, including any contribution made by their setting. The level of detail should be proportionate to the asset's importance and no more than is sufficient to understand the potential impact of the proposal on their significance. As a minimum the relevant Historic Environment Record should have been consulted and the heritage assets assessed using appropriate expertise. Where a site on which development is	

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		proposed includes or has the potential to include heritage assets with archaeological interest, the applicant should include an appropriate desk-based assessment and, where necessary, a field evaluation.	includes a list of data sources consulted to inform the cultural heritage baseline conditions.
	5.128	<p>In determining applications, the Secretary of State should seek to identify and assess the particular significance of any heritage asset that may be affected by the proposed development (including by development affecting the setting of a heritage asset), taking account of the available evidence and any necessary expertise from:</p> <ul style="list-style-type: none"> • relevant information provided with the application and, where applicable, relevant information submitted during examination of the application; • any designation records; • the relevant Historic Environment Record(s), and similar sources of information; • representations made by interested parties during the examination; and • expert advice, where appropriate, and when the need to understand the significance of the heritage asset demands it. 	<p>Cumulative effects are discussed in ES Chapter 20 (Doc Ref. 5.1).</p> <p>The approach to the assessment of the likely significant effects, such that the extent of the impact of the Project on the significance of affected heritage assets is robustly understood, is described in Section 7.9 of ES Chapter 7 (Doc Ref. 5.1).</p> <p>Opportunities for enhancing the significance of relevant heritage assets have been considered. Where such opportunities are possible, these are described in Section 7.8 of ES Chapter 7 (Doc Ref. 5.1).</p>
	5.129	In considering the impact of a proposed development on any heritage assets, the Secretary of State should take into account the particular nature of the significance of the heritage asset and the value that they hold for this and future generations. This understanding should be used to avoid or minimise conflict between their conservation and any aspect of the proposal.	The assessment presented in Section 7.9 of ES Chapter 7 (Doc Ref. 5.1) identifies impacts and effects in terms of their nature (direct/indirect) and duration.
	5.130	The Secretary of State should take into account the desirability of sustaining and, where appropriate, enhancing the significance of heritage assets, the contribution of their settings and the positive contribution that their conservation can make to sustainable communities – including their economic vitality. The Secretary of State should also take into account the desirability of new development making a positive	Recommendations to offset the loss of heritage significance (value) through documentary recording are set out in

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		contribution to the character and local distinctiveness of the historic environment. The consideration of design should include scale, height, massing, alignment, materials, use and landscaping (for example, screen planting).	<p>Section 7.9 of ES Chapter 7 (Doc Ref. 5.1).</p> <p>Archaeological Evaluation Reports (forming ES Appendices 7.6.2 and 7.6.3 (Doc Ref. 5.3)) have been prepared to understand the probability that the development site may include as yet undiscovered heritage assets with archaeological interest, the findings of which have led to the production of Written Schemes of Investigation for post-consent Archaeological Investigations (forming ES Appendices 7.8.1 and 7.8.2 (Doc Ref. 5.3)) to be secured as part of the DCO.</p> <p>Section 8.13 of the Planning Statement (Doc Ref. 7.1) considers the effects of the Project on heritage assets whilst Section 9 of the Planning Statement (Doc Ref. 7.1) weighs these effects against the public benefits of the Project, as required by these policies.</p>
	5.131	When considering the impact of a proposed development on the significance of a designated heritage asset, the Secretary of State should give great weight to the asset's conservation. The more important the asset, the greater the weight should be. Once lost, heritage assets cannot be replaced and their loss has a cultural, environmental, economic and social impact. Significance can be harmed or lost through alteration or destruction of the heritage asset or development within its setting. Given that heritage assets are irreplaceable, harm or loss affecting any designated heritage asset should require clear and convincing justification. Substantial harm to or loss of a grade II Listed Building or a grade II Registered Park or Garden should be exceptional. Substantial harm to or loss of designated assets of the highest significance, including World Heritage Sites, Scheduled Monuments, grade I and II* Listed Buildings, Registered Battlefields, and grade I and II* Registered Parks and Gardens should be wholly exceptional.	
	5.132	Any harmful impact on the significance of a designated heritage asset should be weighed against the public benefit of development, recognising that the greater the harm to the significance of the heritage asset, the greater the justification that will be needed for any loss.	
	5.133	Where the proposed development will lead to substantial harm to or total loss of significance of a designated heritage asset, the Secretary of State should refuse consent unless it can be demonstrated that the substantial harm or loss of significance is necessary in order to deliver substantial public benefits that outweigh that loss or harm, or alternatively that all of the following apply:	

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		<ul style="list-style-type: none"> the nature of the heritage asset prevents all reasonable uses of the site; and no viable use of the heritage asset itself can be found in the medium term through appropriate marketing that will enable its conservation; and conservation by grant-funding or some form of charitable or public ownership is demonstrably not possible; and the harm or loss is outweighed by the benefit of bringing the site back into use. 	
	5.134	Where the proposed development will lead to less than substantial harm to the significance of a designated heritage asset, this harm should be weighed against the public benefits of the proposal, including securing its optimum viable use.	
	5.135	Not all elements of a World Heritage Site or Conservation Area will necessarily contribute to its significance. The Secretary of State should treat the loss of a building (or other element) that makes a positive contribution to the site's significance either as substantial harm or less than substantial harm, as appropriate, taking into account the relative significance of the elements affected and their contribution to the significance of the Conservation Area or World Heritage Site as a whole.	
	5.136	Where the loss of significance of any heritage asset has been justified by the applicant based on the merits of the new development and the significance of the asset in question, the Secretary of State should consider imposing a requirement that the applicant will prevent the loss occurring until the relevant development or part of development has commenced.	
	5.137	Applicants should look for opportunities for new development within Conservation Areas and World Heritage Sites, and within the setting of heritage assets, to enhance or better reveal their significance. Proposals that preserve those elements of the setting that make a positive	

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		contribution to or better reveal the significance of the asset should be treated favourably.	
	5.138	Where there is evidence of deliberate neglect of or damage to a heritage asset the Secretary of State should not take its deteriorated state into account in any decision.	
	5.139	A documentary record of our past is not as valuable as retaining the heritage asset and therefore the ability to record evidence of the asset should not be a factor in deciding whether consent should be given.	
	5.140	Where the loss of the whole or part of a heritage asset's significance is justified, the Secretary of State should require the applicant to record and advance understanding of the significance of the heritage asset before it is lost (wholly or in part). The extent of the requirement should be proportionate to the importance and the impact. Applicants should be required to deposit copies of the reports with the relevant Historic Environment Record. They should also be required to deposit the archive generated in a local museum or other public depository willing to receive it.	
	5.141	The Secretary of State may add requirements to the development consent order to ensure that this is undertaken in a timely manner in accordance with a written scheme of investigation that meets the requirements of this section and has been agreed in writing with the relevant Local Authority (or, where the development is in English waters, with the Marine Management Organisation and English Heritage) and that the completion of the exercise is properly secured.	
Design	4.28	Applicants should include design as an integral consideration from the outset of a proposal.	The importance of good design is acknowledged in Section 7 of the Planning Statement (Doc Ref. 7.1) and the design of the Project, including its evolution, is set out and justified in full in the Design and Access Statement
	4.29	Visual appearance should be a key factor in considering the design of new infrastructure, as well as functionality, fitness for purpose, sustainability and cost. Applying "good design" to national network projects should therefore produce sustainable infrastructure sensitive to	

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		place, efficient in the use of natural resources and energy used in their construction, matched by an appearance that demonstrates good aesthetics as far as possible.	(Doc Ref. 7.3). Additionally, the Sustainability Statement which forms Planning Statement Appendix D (Doc Ref. 7.1) considers how the Project addresses policy and legislation relevant to sustainability.
	4.30	It is acknowledged however, that given the nature of much national network infrastructure development, particularly SRFIs, there may be a limit on the extent to which it can contribute to the enhancement of the quality of the area.	
	4.31	A good design should meet the principal objectives of the scheme by eliminating or substantially mitigating the identified problems by improving operational conditions and simultaneously minimising adverse impacts. It should also mitigate any existing adverse impacts wherever possible, for example, in relation to safety or the environment. A good design will also be one that sustains the improvements to operational efficiency for as many years as is practicable, taking into account capital cost, economics and environmental impacts.	
	4.32	Scheme design will be a material consideration in decision making. The Secretary of State needs to be satisfied that national networks infrastructure projects are sustainable and as aesthetically sensitive, durable, adaptable and resilient as they can reasonably be (having regard to regulatory and other constraints and including accounting for natural hazards such as flooding).	
	4.33	The applicant should therefore take into account, as far as possible, both functionality (including fitness for purpose and sustainability) and aesthetics (including the scheme's contribution to the quality of the area in which it would be located). Applicants will want to consider the role of technology in delivering new national networks projects. The use of professional, independent advice on the design aspects of a proposal. should be considered, to ensure good design principles are embedded into infrastructure proposals.	

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	4.34	Whilst the applicant may only have limited choice in the physical appearance of some national networks infrastructure, there may be opportunities for the applicant to demonstrate good design in terms of siting and design measures relative to existing landscape and historical character and function, landscape permeability, landform and vegetation.	
	4.35	Applicants should be able to demonstrate in their application how the design process was conducted and how the proposed design evolved. Where a number of different designs were considered, applicants should set out the reasons why the favoured choice has been selected. The Examining Authority and Secretary of State should take into account the ultimate purpose of the infrastructure and bear in mind the operational, safety and security requirements which the design has to satisfy.	
Socio-economics	4.87	SFRIs can provide many benefits for the local economy. For example because many of the on-site functions of major distribution operations are relatively labour intensive, this can create many new job opportunities. The existence of an available and economic local workforce will therefore be an important consideration for the applicant.	<p>The Needs Case (Doc Ref. 7.2) addresses this policy and ES Chapter 17 (Doc Ref. 5.1) presents the assessment of effects relating to economics and employment. The Project will deliver significant benefits to the local economy, including the creation of new job opportunities.</p> <p>In accordance with eh policy objective, the Project is supported by an Employment, Skills and Business Strategy provided at ES Appendix 17.8.1 (Doc Ref. 5.3) which sets out measures to enable the local workforce to attain skills relevant to employment opportunities arising from airport growth and which will ensure that the local area</p>

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			benefits from new employment opportunities.
Water Environment	5.92	<p>Applications for projects in the following locations should be accompanied by a flood risk assessment (FRA):</p> <ul style="list-style-type: none"> Flood Zones 2 and 3, medium and high probability of river and sea flooding; Flood Zone 1 (low probability of river and sea flooding) for projects of 1 hectare or greater, projects which may be subject to other sources of flooding (local watercourses, surface water, groundwater or reservoirs), or where the Environment Agency has notified the local planning authority that there are critical drainage problems. 	<p>The drainage design for the Project has applied a hierarchical approach and includes the use of sustainable drainage techniques. The specific measures are set out in Section 11.8 of ES Chapter 11 (Doc Ref. 5.1).</p> <p>The sequential approach has been applied in relation to the assessment of flood risk. In accordance with the policy requirement, a Flood Risk Assessment (FRA) is provided at ES Appendix 11.9.6 (Doc Ref. 5.3).</p>
	5.93	This should identify and assess the risks of all forms of flooding to and from the project and demonstrate how these flood risks will be managed, taking climate change into account.	
	5.94	<p>In preparing an FRA the applicant should:</p> <ul style="list-style-type: none"> consider the risk of all forms of flooding arising from the project (including in adjacent parts of the United Kingdom), in addition to the risk of flooding to the project, and demonstrate how these risks will be managed and, where relevant, mitigated, so that the development remains safe throughout its lifetime; take the impacts of climate change into account, clearly stating the development lifetime over which the assessment has been made; consider the vulnerability of those using the infrastructure including arrangements for safe access and exit; include the assessment of the remaining (known as 'residual') risk after risk reduction measures have been taken into account and demonstrate that this is acceptable for the particular project; consider if there is a need to remain operational during a worst case flood event over the development's lifetime; 	

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		<ul style="list-style-type: none"> provide the evidence for the Secretary of State to apply the Sequential Test and Exception Test, as appropriate. 	
	5.96	Applicants for projects which may be affected by, or may add to, flood risk are advised to seek sufficiently early pre-application discussions with the Environment Agency, and, where relevant, other flood risk management bodies such as lead local flood authorities, Internal Drainage Boards, sewerage undertakers, highways authorities and reservoir owners and operators. Such discussions can be used to identify the likelihood and possible extent and nature of the flood risk, to help scope the FRA, and identify the information that will be required by the Secretary of State to reach a decision on the application once it has been submitted and examined. If the Environment Agency has concerns about the proposal on flood risk grounds, the applicant is encouraged to discuss these concerns with the Environment Agency and look to agree ways in which the proposal might be amended, or additional information provided, which would satisfy the Environment Agency's concerns, preferably before the application for development consent is submitted.	
	5.97	For local flood risk (surface water, groundwater and ordinary watercourse flooding), local flood risk management strategies and surface water management plans provide useful sources of information for consideration in Flood Risk Assessments. Surface water flood issues need to be understood and then account of these issues can be taken, for example flow routes should be clearly identified and managed.	
	5.98	Where flood risk is a factor in determining an application for development consent, the Secretary of State should be satisfied that, where relevant: <ul style="list-style-type: none"> the application is supported by an appropriate FRA; the Sequential Test (see the National Planning Policy Framework) has been applied as part of site selection and, if required, the Exception Test (see the National Planning Policy Framework). 	

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	5.99	<p>When determining an application the Secretary of State should be satisfied that flood risk will not be increased elsewhere and only consider development appropriate in areas at risk of flooding where (informed by a flood risk assessment, following the Sequential Test and, if required, the Exception Test), it can be demonstrated that:</p> <ul style="list-style-type: none"> • within the site, the most vulnerable development is located in areas of lowest flood risk unless there are overriding reasons to prefer a different location; and • development is appropriately flood resilient and resistant, including safe access and escape routes where required, and that any residual risk can be safely managed, including by emergency planning; and priority is given to the use of sustainable drainage systems. 	
	5.100	<p>For construction work which has drainage implications, approval for the project's drainage system will form part of any development consent issued by the Secretary of State. The Secretary of State will therefore need to be satisfied that the proposed drainage system complies with any National Standards published by Ministers under Paragraph 5(1) of Schedule 3 to the Flood and Water Management Act 2010.⁹³ In addition, the development consent order, or any associated planning obligations, will need to make provision for the adoption and maintenance of any Sustainable Drainage Systems (SuDS), including any necessary access rights to property. The Secretary of State, should be satisfied that the most appropriate body is being given the responsibility for maintaining any SuDS, taking into account the nature and security of the infrastructure on the proposed site. The responsible body could include, for example, the applicant, the landowner, the relevant local authority, or another body such as the Internal Drainage Board.</p>	

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	5.101	If the Environment Agency continues to have concerns and objects to the grant of development consent on the grounds of flood risk, the Secretary of State can grant consent, but would need to be satisfied before deciding whether or not to do so that all reasonable steps have been taken by the applicant and the Environment Agency to try and resolve the concerns.	
	5.102	The Secretary of State should expect that reasonable steps have been taken to avoid, limit and reduce the risk of flooding to the proposed infrastructure and others. However, the nature of linear infrastructure means that there will be cases where: <ul style="list-style-type: none"> • upgrades are made to existing infrastructure in an area at risk of flooding; • infrastructure in a flood risk area is being replaced; • infrastructure is being provided to serve a flood risk area; and • infrastructure is being provided connecting two points that are not in flood risk areas, but where the most viable route between the two passes through such an area. 	
	5.103	The design of linear infrastructure and the use of embankments in particular, may mean that linear infrastructure can reduce the risk of flooding for the surrounding area. In such cases the Secretary of State should take account of any positive benefit to placing linear infrastructure in a flood-risk area.	
	5.104	Where linear infrastructure has been proposed in a flood risk area, the Secretary of State should expect reasonable mitigation measures to have been made, to ensure that the infrastructure remains functional in the event of predicted flooding.	
	5.105	Preference should be given to locating projects in Flood Zone 1. If there is no reasonably available site ⁹⁴ in Flood Zone 1, then projects can be located in Flood Zone 2. If there is no reasonably available site in Flood Zones 1 or 2, then national networks infrastructure projects can be	

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		located in Flood Zone 3, subject to the Exception Test. If the development is not essential transport infrastructure that has to cross the area at risk, it is not appropriate in Flood Zone 3b, the functional floodplain where water has to flow and be stored in times of flood.	
	5.106	If, following application of the Sequential Test, it is not possible, consistent with wider sustainability objectives, for the project to be located in zones of lower probability of flooding than Flood Zone 3a, the Exception Test can be applied. The test provides a method of managing flood risk while still allowing necessary development to occur.	
	5.107	The Exception Test is only appropriate for use where the Sequential Test alone cannot deliver an acceptable site, taking into account the need for national networks infrastructure to remain operational during floods.	
	5.108	Both elements of the test will have to be passed for development to be consented. For the Exception Test to be passed: <ul style="list-style-type: none"> it must be demonstrated that the project provides wider sustainability benefits to the community⁹⁵ that outweigh flood risk; and a FRA must demonstrate that the project will be safe for its lifetime, without increasing flood risk elsewhere and, where possible, will reduce flood risk overall. 	
	5.109	In addition, any project that is classified as 'essential infrastructure' and proposed to be located in Flood Zone 3a or b should be designed and constructed to remain operational and safe for users in times of flood; and any project in Zone 3b should result in no net loss of floodplain storage and not impede water flows.	
	5.110	To satisfactorily manage flood risk and the impact of the natural water cycle on people, property and ecosystems, good design and infrastructure may need to be secured using requirements or planning obligations. This may include the use of sustainable drainage systems but could also include vegetation to help to slow runoff, hold back peak	

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		flows and make landscapes more able to absorb the impact of severe weather events.	
	5.111	<p>In this document the term Sustainable Drainage Systems (SuDS) is frequently used and taken to cover the whole range of sustainable approaches to surface water drainage management including:</p> <ul style="list-style-type: none"> • source control measures including rainwater recycling and drainage; • infiltration devices to allow water to soak into the ground, that can include individual soakaways and communal facilities; • filter strips and swales, which are vegetated features that hold and drain water downhill mimicking natural drainage patterns; • filter drains and porous pavements to allow rainwater and run-off to infiltrate into permeable material below ground and provide storage if needed; • basins and ponds to hold excess water after rain and allow controlled discharge that avoids flooding; and • flood routes to carry and direct excess water through developments to minimise the impact of severe rainfall flooding. 	
	5.112	Site layout and surface water drainage systems should cope with events that exceed the design capacity of the system, so that excess water can be safely stored on or conveyed from the site without adverse impacts.	
	5.113	The surface water drainage arrangements for any project should be such that the volumes and peak flow rates of surface water leaving the site are no greater than the rates prior to the proposed project, unless specific off-site arrangements are made and result in the same net effect.	
	5.114	It may be necessary to provide surface water storage and infiltration to limit and reduce both the peak rate of discharge from the site and the total volume discharged from the site. There may be circumstances where it is appropriate for infiltration attenuation storage to be provided	

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		outside the project site, if necessary through the use of a planning obligation.	
	5.115	The sequential approach should be applied to the layout and design of the project. Vulnerable uses should be located on parts of the site at lower probability and residual risk of flooding. Applicants should seek opportunities to use open space for multiple purposes such as amenity, wildlife habitat and flood storage uses. Opportunities can be taken to lower flood risk by improving flow routes, flood storage capacity and using SuDS.	
	5.221	Applicants should make early contact with the relevant regulators, including the Environment Agency, for abstraction licensing and with water supply companies likely to supply the water. Where a development is subject to EIA and the development is likely to have significant adverse effects on the water environment, the applicant should ascertain the existing status of, and carry out an assessment of the impacts of the proposed project on water quality, water resources and physical characteristics as part of the environmental statement.	Consistent with the policy requirement, a Water Framework Directive (WFD) Compliance Assessment has been completed, in line with methodology agreed with the Environment Agency, and is provided in ES Appendix 11.9.2 (Doc Ref. 5.3).
	5.222	For those projects that are improvements to the existing infrastructure, such as road widening, opportunities should be taken, where feasible, to improve upon the quality of existing discharges where these are identified and shown to contribute towards Water Framework Directive commitments.	
	5.223	Any environmental statement should describe: <ul style="list-style-type: none"> the existing quality of waters affected by the proposed project; existing water resources affected by the proposed project and the impacts of the proposed project on water resources; existing physical characteristics of the water environment (including quantity and dynamics of flow) affected by the proposed project, and any impact of physical modifications to these characteristics; 	An assessment of the impacts of the Project on water quality and water resources has been undertaken, consistent with the policy requirement, and is presented in Section 11.9 of ES Chapter 11 (Doc Ref. 5.1).

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		<ul style="list-style-type: none"> any impacts of the proposed project on water bodies or protected areas under the Water Framework Directive and source protection zones (SPZs) around potable groundwater abstractions; and any cumulative effects. 	
	5.224	Activities that discharge to the water environment are subject to pollution control. The considerations set out in paragraphs 4.48-4.56 on the interface between planning and pollution control therefore apply. These considerations will also apply in an analogous way to the abstraction licensing regime regulating activities that take water from the water environment, and to the control regimes relating to works to, and structures in, on, or under a controlled water.	The Code of Construction Practice (CoCP) provided as ES Appendix 5.3.2 (Doc Ref. 5.3) sets out proposed measures to be implemented during construction to protect surface water and groundwater resources in accordance with the requirement.
	5.225	The Secretary of State will generally need to give impacts on the water environment more weight where a project would have adverse effects on the achievement of the environmental objectives established under the Water Framework Directive.	<p>In accordance with the policy requirement, relevant impacts of the Project are identified in the Water Framework Directive (WFD) Compliance Assessment in ES Appendix 11.9.2 (Doc Ref. 5.3).</p> <p>The assessment of potential effects on water resources during operation has been undertaken. As detailed in ES Chapter 11 (Doc Ref. 5.1), subject to suitable mitigation measures, no significant adverse effects on water resources were identified.</p>
	5.226	The Secretary of State should be satisfied that a proposal has had regard to the River Basin Management Plans and the requirements of the Water Framework Directive (including Article 4.7) and its daughter directives, including those on priority substances and groundwater. The specific objectives for particular river basins are set out in River Basin Management Plans. In terms of Water Framework Directive compliance, the overall aim of projects should be no deterioration of ecological status in watercourses, ensuring that Article 4.7 of the Water Framework Directive Regulations does not need to be applied. The Secretary of State should also consider the interactions of the proposed project with other plans such as Water Resources Management Plans, Shoreline/Estuary Management Plans and Marine Plans.	
	5.227	The Examining Authority and the Secretary of State should consider proposals put forward by the applicant to mitigate adverse effects on the water environment and whether appropriate requirements should be	

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		attached to any development consent and/or planning obligations. If the Environment Agency continues to have concerns and objects to the grant of development consent on the grounds of impacts on water quality/resources, the Secretary of State can grant consent, but will need to be satisfied before deciding whether or not to do so that all reasonable steps have been taken by the applicant and the Environment Agency to try to resolve the concerns, and that the Environment Agency is satisfied with the outcome.	
	5.228	The impact on local water resources can be minimised through planning and design for the efficient use of water, including water recycling.	<p>The drainage design for the Project has applied a hierarchical approach and includes the use of sustainable drainage techniques and measures to minimise the impact on local water resources. The specific measures are set out in Section 11.8 of ES Chapter 11 (Doc Ref. 5.1).</p> <p>The use of these measures has been informed by the Water Supply Assessment, which forms ES Appendix 11.9.8 (Doc Ref. 5.3).</p>
	5.230	The project should adhere to any National Standards for sustainable drainage systems (SuDs). The National SuDs Standards will introduce a hierarchical approach to drainage design that promotes the most sustainable approach but recognises feasibility, and use of conventional drainage systems as part of a sustainable solution for any given site given its constraints.	
	5.231	The risk of impacts on the water environment can be reduced through careful design to facilitate adherence to good pollution control practice. For example, designated areas for storage and unloading, with appropriate drainage facilities, should be marked clearly.	
			<p>In accordance with the requirement, the relevant impacts are identified In the Water Framework Directive (WFD) Compliance Assessment in ES Appendix 11.9.2 (Doc Ref. 5.3).</p> <p>The assessment of potential effects on water resources during operation has been undertaken. As detailed in ES Chapter 11 (Doc Ref. 5.1), subject to</p>

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			suitable mitigation measures, no significant adverse effects on water resources were identified.
Health and Wellbeing	3.2	The Government recognises that for development of the national road and rail networks to be sustainable these should be designed to minimise social and environmental impacts and improve quality of life.	Consistent with the policy requirement, Section 18.8 of ES Chapter 18 (Doc Ref. 5.1) identifies all likely effects on health and wellbeing that may arise from the Project.
	5.84	Where the development is subject to an Environmental Impact Assessment, the applicant should assess any likely significant effects on amenity from emissions of odour, dust, steam, smoke and artificial light and describe these in the Environmental Statement.	
	5.85	In particular, the assessment provided by the applicant should describe: <ul style="list-style-type: none"> the type and quantity of emissions; aspects of the development which may give rise to emissions during construction, operation and decommissioning; premises or locations that may be affected by the emissions; effects of the emission on identified premises or locations; and measures to be employed in preventing or mitigating the emissions. 	
	5.86	The applicant is advised to consult the relevant local planning authority and, where appropriate, the Environment Agency about the scope and methodology of the assessment.	
	5.87	The Secretary of State should be satisfied that all reasonable steps have been taken, and will be taken, to minimise any detrimental impact on amenity from emissions of odour, dust, steam, smoke and artificial light. This includes the impact of light pollution from artificial light on local amenity, intrinsically dark landscapes and nature conservation.	
			Section 18.3 of ES Chapter 18 (Doc Ref. 5.1) provides details of the consultation carried out in connection with assessment of the health and wellbeing effects of the Project and the outcomes of and responses to that consultation.
			The mitigation of adverse health impacts is assessed in Section 18.7 of ES Chapter 18 (Doc Ref. 5.1).

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	5.88	If development consent is granted for a project, the Secretary of State should consider whether there is a justification for all of the authorized project (including any associated development) being covered by a defence of statutory authority against nuisance claims. If the Secretary of State cannot conclude that this is justified, then the defence should be disapplied, in whole or in part, through a provision in the Development Consent Order.	Cumulative impacts on health are considered and assessed in Section 18.10 of ES Chapter 18 (Doc Ref. 5.1).
	5.89	The Secretary of State should ensure the applicant has provided sufficient information to show that any necessary mitigation will be put into place. In particular, the Secretary of State should consider whether to require the applicant to abide by a scheme of management and mitigation concerning emissions of odour, dust, steam, smoke, artificial light from the development to reduce any loss to amenity which might arise during the construction and operation of the development. A construction management plan may help codify mitigation.	
Agriculture and Recreation	5.165	The applicant should identify existing and proposed land uses near the project, any effects of replacing an existing development or use of the site with the proposed project or preventing a development or use on a neighbouring site from continuing. Applicants should also assess any effects of precluding a new development or use proposed in the development plan. The assessment should be proportionate.	In accordance with the policy requirement, the detailed site and surroundings are documented in ES Chapter 2 (Doc Ref. 5.1). Relevant information is also set out in Section 19.3 of ES Chapter 19 (Doc Ref. 5.1). Furthermore, the design of the Project is set out and justified in full in the Design and Access Statement (Doc Ref. 7.3).
	5.166	Existing open space, sports and recreational buildings and land should not be developed unless the land is surplus to requirements or the loss would be replaced by equivalent or better provision in terms of quantity and quality in a suitable location. Applicants considering proposals which would involve developing such land should have regard to any local authority's assessment of need for such types of land and buildings.	
	5.167	During any pre-application discussions with the applicant, the local planning authority should identify any concerns it has about the impacts of the application on land-use, having regard to the development plan	Consistent with the policy, the Host Authorities have been consulted at various stages of the proposed Project.

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		and relevant applications, and including, where relevant, whether it agrees with any independent assessment that the land is surplus to requirements. These are also matters that local authorities may wish to include in their Local Impact Report which can be submitted after an application for development consent has been accepted.	The Consultation Report (Doc Ref. 6.1) covers this matter in depth and confirms the nature of any concerns raised.
	5.168	Applicants should take into account the economic and other benefits of the best and most versatile agricultural land (defined as land in grades 1, 2 and 3a of the Agricultural Land Classification). Where significant development of agricultural land is demonstrated to be necessary, applicants should seek to use areas of poorer quality land in preference to that of a higher quality. Applicants should also identify any effects, and seek to minimise impacts, on soil quality, taking into account any mitigation measures proposed. Where possible, developments should be on previously developed (brownfield) sites provided that it is not of high environmental value. For developments on previously developed land, applicants should ensure that they have considered the risk posed by land contamination and how it is proposed to address this.	The quality of agricultural land, including any best and most versatile (BMV) agricultural land, is covered in Sections 19.6 and 19.9 of ES Chapter 19 (Doc Ref. 5.1). In addition, ES Appendix 19.6.1 (Doc Ref. 5.3) sets out Published Agricultural Land Classification Data . Having regard to the findings of ES Chapter 19 (Doc Ref. 5.1) it is considered that very limited negative weight should be attributed in the planning balance to the loss of economic and other benefits resulting from the removal of agricultural land from agricultural use.
	5.169	Applicants should safeguard any mineral resources on the proposed site as far as possible.	Minerals resources are addressed in Section 10.9 of ES Chapter 10 (Doc Ref. 5.1). Preliminary enquiries have been made with third party mineral users regarding opportunities to use the material excavated from the Brick Clay Resource Mineral Safeguarded Area. This will be taken forward within the Materials Management Plan which forms

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			a part of the Construction Code of Practice (CoCP) forming ES Appendix 5.3.2 (Doc Ref. 5.3).
	5.174	The Secretary of State should not grant consent for development on existing open space, sports and recreational buildings and land, including playing fields, unless an assessment has been undertaken either by the local authority or independently, which has shown the open space or the buildings and land to be surplus to requirements, or the Secretary of State determines that the benefits of the project (including need) outweigh the potential loss of such facilities, taking into account any positive proposals made by the applicant to provide new, improved or compensatory land or facilities.	Impact to open and recreational spaces, including the loss of some open space, is addressed in Sections 19.8 and 19.9 of ES Chapter 19 (Doc Ref. 5.1). The impacts of the Project are weighed against the planning benefits of the Project in Section 9 of the Planning Statement (Doc Ref. 7.1).
	5.175	Where networks of green infrastructure have been identified in development plans, they should normally be protected from development, and, where possible, strengthened by or integrated within it. The value of linear infrastructure and its footprint in supporting biodiversity and ecosystems should also be taken into account when assessing the impact on green infrastructure.	Consistent with the policy requirement, the mitigation measures to protect green infrastructure networks are detailed in Section 19.8 of ES Chapter 19 (Doc Ref. 5.1), where the Replacement Open Space proposals are set out. These proposals include the provision of new public footpaths and changes to existing public footpaths and management measures to maintain safe public access including a Public Rights of Way Management Plan , comprising ES Appendix 19.8.2 (Doc Ref. 5.3).
	5.176	The decision-maker should take into account the economic and other benefits of the best and most versatile agricultural land. The decisionmaker should give little weight to the loss of agricultural land in grades 3b, 4 and 5, except in areas (such as uplands) where particular	The quality of agricultural land, including any best and most versatile (BMV) agricultural land, is covered in Sections 19.6 and 19.9 of ES Chapter 19 (Doc Ref. 5.1). In addition, ES Appendix

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		agricultural practices may themselves contribute to the quality and character of the environment or the local economy.	19.6.1 (Doc Ref. 5.3) sets out Published Agricultural Land Classification Data . Having regard to the findings of ES Chapter 19 (Doc Ref. 5.1) it is considered that very limited negative weight should be attributed in the planning balance to the loss of economic and other benefits resulting from the removal of agricultural land from agricultural use.
	5.180	Where green infrastructure is affected, applicants should aim to ensure the functionality and connectivity of the green infrastructure network is maintained and any necessary works are undertaken, where possible, to mitigate any adverse impact and, where appropriate, to improve that network and other areas of open space, including appropriate access to new coastal access routes, National Trails and other public rights of way.	The mitigation measures set out in Section 19.8 of ES Chapter 19 (Doc Ref. 5.1), together with an assessment of the impacts on Public Rights of Way as set out in ES Appendix 19.8.2: Public Rights of Way Management Plan (Doc Ref. 5.3) detail the beneficial effects of Project in terms of achieving a functional and well connected green infrastructure network.
	5.181	The Secretary of State should also consider whether mitigation of any adverse effects on green infrastructure or open space is adequately provided for by means of any planning obligations, for example, to provide exchange land and provide for appropriate management and maintenance agreements. Any exchange land should be at least as good in terms of size, usefulness, attractiveness, quality and accessibility. Alternatively, where Sections 131 and 132 of the Planning Act 2008 apply, any replacement land provided under those sections will need to conform to the requirements of those sections.	This is addressed in Sections 19.8 and 19.9 of ES Chapter 19 (Doc Ref. 5.1) where the Replacement Open Space proposals are justified. These proposals include a number of mitigation elements, such as the provision of public open space, provision of new and changes to existing public footpaths and management measures to maintain safe public access including a Public Rights

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			of Way management strategy. Whilst the Project will result in the loss of 1.18 hectares of agricultural land, no best and most versatile land resource (Grades 1, 2 or 3a land) is to be lost as part of this and this loss would be replaced by 1.7 hectares of better public open space provision in terms of quality and quantity. The Project is assessed as being compliant with the policy.
	5.182	Where a proposed development has an impact on a Mineral Safeguarding Area (MSA), the Secretary of State should ensure that the applicant has put forward appropriate mitigation measures to safeguard mineral resources.	This is addressed in Section 10.9 of ES Chapter 10 (Doc Ref. 5.1). Preliminary enquiries have been made with third party mineral users regarding opportunities to use the material excavated from the Brick Clay Resource Mineral Safeguarded Area. This will be taken forward within the Materials Management Plan which forms a part of the Construction Code of Practice (CoCP) forming ES Appendix 5.3.2 (Doc Ref. 5.3).
	5.183	Where a project has a minimising effect on land use there may be scope for this to be mitigated through, for example, using the land for nature conservation or wildlife corridors or for parking and storage in employment areas.	The Replacement Open Space proposals are justified in Sections 19.8 and 19.9 of ES Chapter 19 (Doc Ref. 5.1). Section 9.8 of ES Chapter 9 (Doc Ref. 5.1) sets out how parts of the identified mitigation areas would be managed to

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			provide suitable wildlife habitat in accordance with the policy requirement.
	5.184	Public rights of way, National Trails, and other rights of access to land (e.g. open access land) are important recreational facilities for walkers, cyclists and equestrians. Applicants are expected to take appropriate mitigation measures to address adverse effects on coastal access, National Trails, other public rights of way and open access land and, where appropriate, to consider what opportunities there may be to improve access. In considering revisions to an existing right of way consideration needs to be given to the use, character, attractiveness and convenience of the right of way. The Secretary of State should consider whether the mitigation measures put forward by an applicant are acceptable and whether requirements in respect of these measures might be attached to any grant of development consent.	<p>The Project includes a number of mitigation elements, such as the provision of public open space, provision of new public footpaths and changes to existing public footpaths and management measures to maintain safe public access including a Public Rights of Way Management Plan</p> <p>The mitigation measures are set out in Section 19.8 of ES Chapter 19 (Doc Ref. 5.1), and details relating to the management of Public Rights of Way are set out in ES Appendix 19.8.2: Public Rights of Way Management Plan (Doc Ref. 5.3). These beneficial effects demonstrate compliance of the Project with the policy objective.</p>
	5.185	Public rights of way can be extinguished under Section 136 of the Act if the Secretary of State is satisfied that an alternative has been or will be provided or is not required.	
Landscape, Townscape and Visual Resources	5.144	Where the development is subject to EIA the applicant should undertake an assessment of any likely significant landscape and visual impacts in the environmental impact assessment and describe these in the environmental assessment. A number of guides have been produced to assist in addressing landscape issues. The landscape and visual assessment should include reference to any landscape character assessment and associated studies, as a means of assessing landscape impacts relevant to the proposed project. The applicant's assessment	Landscape and townscape character, condition and quality are described in Section 8.6 of ES Chapter 8 (Doc Ref. 5.1). An assessment of the likely landscape and visual effects of the Project during both the construction and operational periods is presented in Section 8.9 of ES Chapter 8 (Doc Ref.

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		should also take account of any relevant policies based on these assessments in local development documents in England.	5.1). Cumulative effects on landscape, townscape and visual resources and tranquility are described in Section 8.11 of ES Chapter 8 (Doc Ref. 5.1). This assessment refers to relevant landscape character and green infrastructure studies as a means of assessing the landscape effects and also takes account of relevant policies in local development documents as identified within Section 8.2 of ES Chapter 8 (Doc Ref. 5.1). The Project is compliant with the policy requirement.
	5.145	The applicant's assessment should include any significant effects during construction of the project and/or the significant effects of the completed development and its operation on landscape components and landscape character (including historic landscape characterisation).	
	5.146	The assessment should include the visibility and conspicuousness of the project during construction and of the presence and operation of the project and potential impacts on views and visual amenity. This should include any noise and light pollution effects, including on local amenity, tranquillity and nature conservation.	
	5.147	Any statutory undertaker commissioning or undertaking works in relation to, or so as to affect land in a National Park or Areas of Outstanding Natural Beauty, would need to comply with the respective duties in section 11A of the National Parks and Access to Countryside Act 1949 and section 85 of the Countryside and Rights of Way Act 2000.	
	5.149	Landscape effects depend on the nature of the existing landscape likely to be affected and nature of the effect likely to occur. Both of these factors need to be considered in judging the impact of a project on landscape. Projects need to be designed carefully, taking account of the potential impact on the landscape. Having regard to siting, operational and other relevant constraints, the aim should be to avoid or minimise harm to the landscape, providing reasonable mitigation where possible and appropriate.	
			Consistent with the policy requirement, an assessment of the likely landscape and visual effects of the Project during both the construction and operational periods is presented in Section 8.9 of ES Chapter 8 (Doc Ref. 5.1). Cumulative effects on landscape, townscape and visual resources and tranquility are described in Section 8.11 of ES Chapter 8 (Doc Ref. 5.1). Section 8.8 of ES Chapter 8 (Doc Ref. 5.1) describes the proposed embedded and additional measures to mitigate significant adverse landscape and visual

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			<p>effects. This matter is also addressed in the Design and Access Statement (Doc Ref. 7.3) where it is demonstrated that the Project has been carefully designed to minimise its impact on the landscape.</p> <p>The effects of noise in terms of tranquility and the effects of light generally on night time visual amenity have been assessed in Sections 8.9 and 8.11 of ES Chapter 8 (Doc Ref. 5.1). The assessment of the Project demonstrates full compliance with the policy.</p>
	5.150	<p>Great weight should be given to conserving landscape and scenic beauty in nationally designated areas. National Parks, the Broads and Areas of Outstanding Natural Beauty have the highest status of protection in relation to landscape and scenic beauty. Each of these designated areas has specific statutory purposes which help ensure their continued protection and which the Secretary of State has a statutory duty to have regard to in decisions.</p>	<p>Areas of Outstanding Natural Beauty (AONBs) and National Parks within the study area include High Weald AONB, Surrey Hills AONB, Kent Downs AONB and South Downs National Park. These areas, along with areas of landscape that are highly valued locally and/or protected by a local landscape/visual designation are identified in Section 8.6 of ES Chapter 8 (Doc Ref. 5.1) and are considered in Section 8.9 of ES Chapter 8 (Doc Ref. 5.1) to inform judgements on the value of a landscape receptor and the magnitude of impact on a landscape receptor. The Project has</p>

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			<p>been designed to sensitively address the purposes of the AONB designations. The nationally designated landscape authorities were consulted on the Project as summarised in Section 8.3 of ES Chapter 8 (Doc Ref. 5.1). The effects of the increase in aircraft movements on the AONBs is also assessed in Section 8.9 of ES Chapter 8 (Doc Ref. 5.1). These assessments demonstrate the Project's compliance with the policy requirement.</p>
	5.151	<p>The Secretary of State should refuse development consent in these areas except in exceptional circumstances and where it can be demonstrated that it is in the public interest. Consideration of such applications should include an assessment of:</p> <ul style="list-style-type: none"> the need for the development, including in terms of any national considerations, and the impact of consenting, or not consenting it, upon the local economy; the cost of, and scope for, developing elsewhere, outside the designated area, or meeting the need for it in some other way; and any detrimental effect on the environment, the landscape and recreational opportunities, and the extent to which that could be moderated. 	<p>The Project has been designed carefully, aiming to avoid or minimise harm to the landscape and providing reasonable mitigation where possible and appropriate in accordance with policy requirements. Section 8.9 of ES Chapter 8 (Doc Ref. 5.1) considers impact and tranquillity in terms of its assessment of effects on landscape receptors.</p>
	5.152	<p>There is a strong presumption against any significant road widening or the building of new roads and strategic rail freight interchanges in a National Park, the Broads and Areas of Outstanding Natural Beauty, unless it can be shown there are compelling reasons for the new or enhanced capacity and with any benefits outweighing the costs very significantly. Planning of the Strategic Road Network should encourage</p>	<p>Section 8.14 of the Planning Statement (Doc Ref. 7.1) summarises the overall visual effects on sensitive receptors whilst Section 9 of the Planning Statement (Doc Ref. 7.1) balances these effects against the wider</p>

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		routes that avoid National Parks, the Broads and Areas of Outstanding Natural Beauty.	benefits and adverse impacts of the Project, as required by this policy.
	5.153	Where consent is given in these areas, the Secretary of State should be satisfied that the applicant has ensured that the project will be carried out to high environmental standards and where possible includes measures to enhance other aspects of the environment. Where necessary, the Secretary of State should consider the imposition of appropriate requirements to ensure these standards are delivered.	
	5.154	The duty to have regard to the purposes of nationally designated areas also applies when considering applications for projects outside the boundaries of these areas which may have impacts within them. The aim should be to avoid compromising the purposes of designation and such projects should be designed sensitively given the various siting, operational, and other relevant constraints. This should include projects in England which may have impacts on designated areas in Wales or on National Scenic Areas in Scotland.	
	5.155	The fact that a proposed project will be visible from within a designated area should not in itself be a reason for refusing consent.	
	5.156	Outside nationally designated areas, there are local landscapes that may be highly valued locally and protected by local designation. Where a local development document in England has policies based on landscape character assessment, these should be given particular consideration. However, local landscape designations should not be used in themselves as reasons to refuse consent, as this may unduly restrict acceptable development.	
	5.157	In taking decisions, the Secretary of State should consider whether the project has been designed carefully, taking account of environmental effects on the landscape and siting, operational and other relevant constraints, to avoid adverse effects on landscape or to minimise harm to the landscape, including by reasonable mitigation.	

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	5.158	The Secretary of State will have to judge whether the visual effects on sensitive receptors, such as local residents, and other receptors, such as visitors to the local area, outweigh the benefits of the development. Coastal areas are particularly vulnerable to visual intrusion because of the potential high visibility of development on the foreshore, on the skyline and affecting views along stretches of undeveloped coast, especially those defined as Heritage Coast.	
	5.159	Reducing the scale of a project or making changes to its operation can help to avoid or mitigate the visual and landscape effects of a proposed project. However, reducing the scale or otherwise amending the design or changing the operation of a proposed development may result in a significant operational constraint and reduction in function. There may, be exceptional circumstances, where mitigation could have a very significant benefit and warrant a small reduction in scale or function. In these circumstances, the Secretary of State may decide that the benefits of the mitigation to reduce the landscape effects outweigh the marginal loss of scale or function.	
	5.160	Adverse landscape and visual effects may be minimised through appropriate siting of infrastructure, design (including choice of materials), and landscaping schemes, depending on the size and type of proposed project. Materials and designs for infrastructure should always be given careful consideration.	
	5.161	Depending on the topography of the surrounding terrain and areas of population it may be appropriate to undertake landscaping off site, although if such landscaping was proposed to be consented by the development consent order, it would have to be included within the order limits for that application. For example, filling in gaps in existing tree and hedge lines would mitigate the impact when viewed from a more distant vista.	

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	5.179	Applicants can minimise the direct effects of a project on the existing use of the proposed site, or proposed uses near the site by the application of good design principles, including the layout of the project and the protection of soils during construction.	Section 8.8 of ES Chapter 8 (Doc Ref. 5.1) describes the proposed embedded and additional measures to mitigate significant adverse landscape and visual effects. The mitigation measures are also considered in the Design and Access Statement (Doc Ref. 7.3) where it is demonstrated that the Project has been carefully designed to minimise its impact on the landscape in accordance with the policy requirement.
Noise and Vibration	5.189	<p>Where a development is subject to EIA and significant noise impacts are likely to arise from the proposed development, the applicant should include the following in the noise assessment, which should form part of the environment statement:</p> <ul style="list-style-type: none"> • a description of the noise sources including likely usage in terms of number of movements, fleet mix and diurnal pattern. For any associated fixed structures, such as ventilation fans for tunnels, information about the noise sources including the identification of any distinctive tonal, impulsive or low frequency characteristics of the noise. • identification of noise sensitive premises and noise sensitive areas that may be affected. • the characteristics of the existing noise environment. • a prediction on how the noise environment will change with the proposed development: <ul style="list-style-type: none"> ○ In the shorter term such as during the construction period; ○ in the longer term during the operating life of the infrastructure; 	Section 14.2 of ES Chapter 14 (Doc Ref. 5.1) considers and addresses the requirements of the Noise Policy Statement for England. Sections 14.4 and 14.6 of ES Chapter 14 (Doc Ref. 5.1) set out the description of the noise sources as required. Section 14.3 of ES Chapter 14 (Doc Ref. 5.1) describes the scope for the assessment of noise sensitive premises and noise sensitive areas included in the assessment with further details of the assessment included in Section 14.4 of ES Chapter 14 (Doc Ref. 5.1) and the assessment of the effects in Section 14.9 of ES Chapter 14 (Doc Ref. 5.1). Section 14.6 of ES Chapter 14 (Doc Ref. 5.1) sets out the characteristics of the existing

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		<ul style="list-style-type: none"> ○ at particular times of the day, evening and night as appropriate. • an assessment of the effect of predicted changes in the noise environment on any noise sensitive premises and noise sensitive areas. • measures to be employed in mitigating the effects of noise. Applicants should consider using best available techniques to reduce noise impacts. • the nature and extent of the noise assessment should be proportionate to the likely noise impact. 	<p>noise environment. Section 14.9 of ES Chapter 14 (Doc Ref. 5.1) sets out how the noise environment is predicted to change with the Project for the noise sources and time-periods required. Sections 14.8 and 14.9 of ES Chapter 14 (Doc Ref. 5.1) set out mitigation and noise control measures and demonstrate how those measures will reduce the potential adverse impact resulting from noise from the Project.</p> <p>Full details of the proposed noise insulation scheme and associated community compensation, including details of consultation, fund sourcing, fund size and duration, eligibility and the means of delivering and securing the Project are set out in Section 8.20 of the Planning Statement (Doc Ref. 7.1). The effects of the Project in terms of noise and vibration have been fully assessed in accordance with the policy requirement.</p>
	5.190	The potential noise impact elsewhere that is directly associated with the development, such as changes in road and rail traffic movements elsewhere on the national networks, should be considered as appropriate.	
	5.191	Operational noise, with respect to human receptors, should be assessed using the principles of the relevant British Standards and other guidance. The prediction of road traffic noise should be based on the method described in Calculation of Road Traffic Noise. The prediction of noise from new railways should be based on the method described in Calculation of Railway Noise. For the prediction, assessment and management of construction noise, reference should be made to any relevant British Standards and other guidance which also give examples of mitigation strategies	
	5.192	The applicant should consult Natural England with regard to assessment of noise on designated nature conservation sites, protected landscapes, protected species or other wildlife. The results of any noise surveys and predictions may inform the ecological assessment. The seasonality of potentially affected species in nearby sites may also need to be taken into account.	
	5.193	Developments must be undertaken in accordance with statutory	

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		requirements for noise. Due regard must have been given to the relevant sections of the Noise Policy Statement for England, National Planning Policy Framework and the Government's associated planning guidance on noise.	
	5.194	The project should demonstrate good design through optimisation of scheme layout to minimise noise emissions and, where possible, the use of landscaping, bunds or noise barriers to reduce noise transmission. The project should also consider the need for the mitigation of impacts elsewhere on the road and rail networks that have been identified as arising from the development, according to Government policy.	
	5.195	The Secretary of State should not grant development consent unless satisfied that the proposals will meet, the following aims, within the context of Government policy on sustainable development: <ul style="list-style-type: none"> • avoid significant adverse impacts on health and quality of life from noise as a result of the new development; • mitigate and minimise other adverse impacts on health and quality of life from noise from the new development; and • contribute to improvements to health and quality of life through the effective management and control of noise, where possible. 	
	5.196	In determining an application, the Secretary of State should consider whether requirements are needed which specify that the mitigation measures put forward by the applicant are put in place to ensure that the noise levels from the project do not exceed those described in the assessment or any other estimates on which the decision was based.	
	5.197	The Examining Authority and the Secretary of State should consider whether mitigation measures are needed both for operational and construction noise over and above any which may form part of the project application. The Secretary of State may wish to impose requirements to ensure delivery of all mitigation measures.	

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	5.198	<p>Mitigation measures for the project should be proportionate and reasonable and may include one or more of the following:</p> <ul style="list-style-type: none"> • engineering: containment of noise generated; • materials: use of materials that reduce noise, (for example low noise road surfacing); • lay-out: adequate distance between source and noise-sensitive receptors; incorporating good design to minimise noise transmission through screening by natural or purpose built barriers; • administration: specifying acceptable noise limits or times of use (e.g., in the case of railway station PA systems). 	
	5.199	<p>For most national network projects, the relevant Noise Insulation Regulations will apply. These place a duty on and provide powers to the relevant authority to offer noise mitigation through improved sound insulation to dwellings, with associated ventilation to deal with both construction and operational noise. An indication of the likely eligibility for such compensation should be included in the assessment. In extreme cases, the applicant may consider it appropriate to provide noise mitigation through the compulsory acquisition of affected properties in order to gain consent for what might otherwise be unacceptable development. Where mitigation is proposed to be dealt with through compulsory acquisition, such properties would have to be included within the development consent order land in relation to which compulsory acquisition powers are being sought.</p>	
	5.200	<p>Applicants should consider opportunities to address the noise issues associated with the Important Areas as identified through the noise action planning process.</p>	
Ground Conditions	5.117	<p>Where necessary, land stability should be considered in respect of new development, as set out in the National Planning Policy Framework and supporting planning guidance. Specifically, proposals should be appropriate for the location, including preventing unacceptable risks from</p>	<p>In accordance with the policy requirement, the Project is supported by a geotechnical assessment which takes into account potential land stability</p>

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		land instability. If land stability could be an issue, applicants should seek appropriate technical and environmental expert advice to assess the likely consequences of proposed developments on sites where subsidence, landslides and ground compression is known or suspected. Applicants should liaise with the Coal Authority if necessary.	issues. Section 10.8 of ES Chapter 10 (Doc Ref. 5.1) summarises how land stability risks would be mitigated and minimised. A Preliminary Risk Assessment has been prepared and forms ES Appendix 10.9.1 (Doc Ref. 5.3). This has ensured that appropriate technical and environmental advice has informed the assessment of ground conditions. The Preliminary Risk Assessment has identified that there are areas at moderate risk for compressibility across the site which appear to correspond to BGS mapped areas of Alluvium as well as a moderate risk of slope instability for a small area along the A23 embankment.
	5.118	A preliminary assessment of ground instability should be carried out at the earliest possible stage before a detailed application for development consent is prepared. Applicants should ensure that any necessary investigations are undertaken to ascertain that their sites are and will remain stable or can be made so as part of the development. The site needs to be assessed in context of surrounding areas where subsidence, landslides and land compression could threaten the development during its anticipated life or damage neighbouring land or property. This could be in the form of a land stability or slope stability risk assessment report.	
	5.119	Applicants have a range of mechanisms available to mitigate and minimise risks of land instability. These include: <ul style="list-style-type: none"> Establishing the principle and layout of new development, for example avoiding mine entries and other hazards. Ensuring proper design of structures to cope with any movement expected, and other hazards such as mine and/or ground gases; or Requiring ground improvement techniques, usually involving the removal of poor material and its replacement with suitable inert and stable material. For development on land previously affected by mining activity, this may mean prior extraction of any remaining mineral resource. 	Mitigation measures are incorporated within the Project to minimise impacts relating to land instability. These are set out in Section 10.8 of ES Chapter 10 (Doc Ref. 5.1).
	5.168	Applicants should take into account the economic and other benefits of the best and most versatile agricultural land (defined as land in grades 1,	A Preliminary Risk Assessment is provided at ES Appendix 10.9.1 (Doc

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		2 and 3a of the Agricultural Land Classification). Where significant development of agricultural land is demonstrated to be necessary, applicants should seek to use areas of poorer quality land in preference to that of a higher quality. Applicants should also identify any effects, and seek to minimise impacts on soil quality, taking into account any mitigation measures proposed. Where possible, developments should be on previously developed (brownfield) sites provided that it is not of high environmental value. For developments on previously developed land, applicants should ensure that they have considered the risk posed by land contamination and how it is proposed to address this.	Ref. 5.3). The assessment considers potential areas of land contamination likely to be affected by the Project in accordance with statutory guidance and best practice. The assessment and forms the main source of information in defining the Baseline Environment that is described in Section 10.6 of ES Chapter 10 (Doc Ref. 5.1). In response to the findings of a number of historical and current potential sources of contamination across the Project site a series of mitigation measures have been adopted as part of the Project, to ensure the land contamination risk has been suitably addressed. Details of the mitigation measures incorporated to minimise these risks are set out in Section 10.8 of ES Chapter 10 (Doc Ref. 5.1) and principally comprise a remediation strategy.
Traffic and Transport	3.2	The Government recognises that for development of the national road and rail networks to be sustainable these should be designed to minimize social and environmental impacts and improve quality of life.	The Design and Access Statement (Doc Ref. 7.3) and the Transport Assessment (Doc Ref. 7.4) outline those considerations factored into the design of the Project to ensure that the airport provides equal access for all potential users.
	3.17	There is a direct role for the national road network to play in helping pedestrians and cyclists. The Government expects applicants to use reasonable endeavours to address the needs of cyclists and pedestrians in the design of new schemes. The Government also expects applicants to identify opportunities to invest in infrastructure in locations where the national road network severs communities and acts as a barrier to	

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		cycling and walking, by correcting historic problems, retrofitting the latest solutions and ensuring that it is easy and safe for cyclists to use junctions.	Additionally, the Project is supported by an Employment, Skills and Business Strategy at ES Appendix 17.8.1 (Doc Ref. 5.3) which sets out the benefit to the local population.
	3.20	<p>The Government's strategy for improving accessibility for disabled people is set out in Transport for Everyone: an action plan to improve accessibility for all. In particular:</p> <ul style="list-style-type: none"> The Government will continue to work to ensure that the bus and train fleets comply with modern access standards by 2020, and to improve rail station access for passengers with reduced mobility. The private car will continue to play an important role, providing disabled people with independence where other forms of transport are not accessible or available. The Government expects applicants to improve access, wherever possible, on and around the national networks by designing and delivering schemes that take account of the accessibility requirements of all those who use, or are affected by, national networks infrastructure, including disabled users. All reasonable opportunities to deliver improvements in accessibility on and to the existing national road network should also be taken wherever appropriate. 	<p>Negative health impacts have been mitigated against as detailed and assessed in Sections 18.7 and 18.8 of ES Chapter 18 (Doc Ref. 5.1).</p> <p>Equalities impacts have been robustly assessed consistent with policy requirement.</p>
	4.63	Road safety audits are intended to ensure that operational road safety experience is applied during the design and construction process so that the number and severity of collisions is as low as is reasonably practicable.	A Road Safety Audit has informed the design of changes to the highway network to facilitate the Project. This is covered in Sections 12.4 and 12.6 of ES Chapter 12 (Doc Ref. 5.1).
	5.203	Applicants should have regard to the policies set out in local plans, for example, policies on demand management being undertaken at the local level.	As per the policy requirement, local plan policies are fully considered as part of the assessment provided within Section 12.2 of ES Chapter 12 (Doc Ref. 5.1)

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			and the Transport Assessment (Doc Ref. 7.4).
	5.204	Applicants should consult the relevant highway authority, and local planning authority, as appropriate, on the assessment of transport impacts.	Details of the engagement undertaken with relevant highway authorities is set out in Section 12.3 of ES Chapter 12 (Doc Ref. 5.1).
	5.205	Applicants should consider reasonable opportunities to support other transport modes in developing infrastructure. As part of this, consistent with paragraph 3.19-3.22 above, the applicant should provide evidence that as part of the project they have used reasonable endeavours to address any existing severance issues that act as a barrier to nonmotorized users.	<p>The Transport Assessment (TA) (Doc Ref. 7.4) and Surface Access Commitments (SACs) comprising ES Appendix 5.4.1 (Doc Ref. 5.3) set out a series of interventions to ensure sustainable growth of the airport. The documents show the predicted level of trips by the range of travel modes, which are based on specific targets for minimising the proportion of journeys made by non-car modes. Predicted traffic flows on the highway network in the vicinity of the airport are presented in ES Appendix 12.9.1: Highway Flows and Driver Delay Review (Doc Ref. 5.3). These flows reflect the targets that have been adopted to achieve the maximum mode shift away from car based transport modes.</p> <p>Severance is considered in Section 12.8 of ES Chapter 12 (Doc Ref. 5.1).</p>

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			The Project is fully compliant with the policy requirement to demonstrate support to different travel modes.
	5.206	For road and rail developments, if a development is subject to EIA and is likely to have significant environmental impacts arising from impacts on transport networks, the applicant's environmental statement should describe those impacts and mitigating commitments. In all other cases the applicant's assessment should include a proportionate assessment of the transport impacts on other networks as part of the application.	<p>In accordance with requirement of this policy, the Transport Assessment (TA) (Doc Ref. 7.4) and the Surface Access Commitments (SACs) forming ES Appendix 5.4.1 (Doc Ref. 5.3) provide full details of the Project's effects upon transport networks. The assessment demonstrates the predicted level of trips by the range of travel modes, which are based on specific targets for maximising the proportion of journeys made by non-car modes. Predicted traffic flows on the highway network in the vicinity of the airport are presented in ES Appendix 12.9.1 (Doc Ref. 5.3). These flows reflect the targets that have been adopted to achieve the mode shift.</p> <p>The air quality impacts from road traffic have been assessed and the results are presented in Section 13.10 of ES Chapter 13 (Doc Ref. 5.1).</p>
	5.207	If a project is likely to have significant transport impacts it should include a Transport Assessment, using the WebTAG methodology stipulated in Department for Transport guidance, or any successor to such methodology. If a development is subject to EIA and is likely to have	The transport modelling has been undertaken using the WebTAG

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		significant environmental impacts arising from impacts on transport networks, the applicant's environmental statement should describe those impacts.	methodology in accordance with the policy.
	5.208	Where appropriate, the applicant should prepare a travel plan including management measures to mitigate transport impacts. The applicant should also provide details of proposed measures to improve access by public transport and sustainable modes where relevant, to reduce the need for any parking associated with the proposal and to mitigate transport impacts.	In accordance with the requirements of this policy, the Transport Assessment (TA) (Doc Ref. 7.4) and the Surface Access Commitments (SACs) forming ES Appendix 5.4.1 (Doc Ref. 5.3) provide full details of the Project's effects upon transport networks. The assessment demonstrates the predicted level of trips by the range of travel modes, which are based on specific targets for maximising the proportion of journeys made by non-car modes. Predicted traffic flows on the highway network in the vicinity of the airport are presented in ES Appendix 12.9.1: Highway Flows and Driver Delay Review (Doc Ref. 5.3). These flows reflect the targets that have been adopted to achieve the mode shift. The air quality impacts from road traffic have been assessed and the results are presented in Section 13.10 of ES Chapter 13 (Doc Ref. 5.1).
	5.209	For schemes impacting on the Strategic Road Network, applicants should have regard to DfT Circular 02/2013 The Strategic Road Network and the delivery of sustainable development (or prevailing policy) which sets out the way in which the highway authority for the Strategic Road Network, will engage with communities and the development industry to deliver sustainable development and, thus, economic growth, whilst safeguarding the primary function and purpose of the Strategic Road Network.	
	5.211	The Examining Authority and the Secretary of State should give due consideration to impacts on local transport networks and policies set out	Relevant local policy has been considered in Section 12.2 of ES

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		in local plans, for example, policies on demand management being undertaken at the local level.	Chapter 12 (Doc Ref. 5.1) and assessed in Section 12.9 of ES Chapter 12 (Doc Ref. 5.1).
	5.212	Schemes should be developed and options considered in the light of relevant local policies and local plans, taking into account local models where appropriate, however the scheme must be decided in accordance with the NPS except to the extent that one or more of sub-sections 104(4) to 104(8) of the Planning Act 2008 applies.	
	5.214	Provided that the applicant is willing to commit to transport planning obligations and, to mitigate transport impacts identified in the WebTAG transport assessment (including environment and social impacts), with attribution of costs calculated in accordance with the Department's guidance, then development consent should not be withheld. Appropriately limited weight should be applied to residual effects on the surrounding transport infrastructure.	<p>The transport modelling has been undertaken using the WebTAG methodology consistent with the policy requirement.</p> <p>The extent of engagement that has been undertaken is summarised in Section 12.3 of ES Chapter 12 (Doc Ref. 5.1).</p> <p>Separate assessments for construction and operation are presented in Section 12.9 of ES Chapter 12 (Doc Ref. 5.1).</p>
	5.215	Mitigation measures for schemes should be proportionate and reasonable, focussed on promoting sustainable development.	Section 12.8 of ES Chapter 12 (Doc Ref. 5.1) covers mitigation measures associated with the Project and any resultant impacts on traffic and transport.
	5.216	Where development would worsen accessibility such impacts should be mitigated so far as reasonably possible. There is a very strong expectation that impacts on accessibility for non-motorised users should be mitigated.	
	5.217	Mitigation measures may relate to the design, lay-out or operation of the scheme.	
Waste and Resource Management	5.42	The applicant should set out the arrangements that are proposed for managing any waste produced. The arrangements described should include information on the proposed waste recovery and disposal system	Details of the management of waste are set out in ES Appendix 5.3.2: CoCP Annex 5 - Construction Resources

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		for all waste generated by the development. The applicant should seek to minimise the volume of waste produced and the volume of waste sent for disposal unless it can be demonstrated that the alternative is the best overall environmental outcome.	and Waste Management Plan (Doc Ref. 5.3). The document presents arrangements that are proposed for managing waste produced including information on the proposed waste recovery and disposal system for all waste generated by the Project in accordance with the policy requirement.
	5.43	<p>The Secretary of State should consider the extent to which the applicant has proposed an effective process that will be followed to ensure effective management of hazardous and non-hazardous waste arising from the construction and operation of the proposed development. The Secretary of State should be satisfied that the process sets out:</p> <ul style="list-style-type: none"> any such waste will be properly managed, both on-site and off-site; the waste from the proposed facility can be dealt with appropriately by the waste infrastructure which is, or is likely to be, available. Such waste arisings should not have an adverse effect on the capacity of existing waste management facilities to deal with other waste arisings in the area; and adequate steps have been taken to minimise the volume of waste arisings, and of the volume of waste arisings sent to disposal, except where an alternative is the most sustainable outcome overall. 	The Project's target for construction waste (divert 90% of demolition materials from landfill; and divert 80% of construction waste i.e., non-demolition waste from landfill) exceeds the 70% target. This is set out in detail in ES Appendix 5.3.2: CoCP Annex 5 - Construction Resources and Waste Management Plan (Doc Ref. 5.3)
	5.44	Where necessary, the Secretary of State should use requirements or planning obligations to ensure that appropriate measures for waste management are applied.	
	5.45	Where the project will be subject to the Environment Agency's environmental permitting regime, waste management arrangements during operations will be covered by the permit and the considerations set out in paragraphs 4.48 to 4.56 will apply.	Matters in relation to environmental permitting are addressed in ES Appendix 5.3.2: CoCP Annex 5 - Construction Resources and Waste Management Plan (Doc Ref. 5.3)

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Safety and Security	5.48	Certain civil aerodromes, and aviation technical sites, selected on the basis of their importance to the national air transport system, are officially safeguarded in order to ensure that their operation is not inhibited by new development. A similar official safeguarding system applies to certain military aerodromes and defence assets, selected on the basis of their strategic importance. Areas of airspace around aerodromes used by aircraft taking off or on approach and landing are described as “obstacle limitation surfaces” (OLS) and defined according to criteria set out in relevant Civil Aviation Authority (CAA) guidance. ⁸³ Aerodromes that are officially safeguarded will have CAA certified Safeguarding maps showing the OLS.	The Project complies with all UK aviation laws, industry guidance and standards, in order to comply with the Aerodrome Certificate that allows the airport to operate. The Aerodrome Certificate requires compliance with security measures, including in relation to terrorism. Security and safety measures are also discussed in Major Accidents and Disasters which forms ES Appendix 5.3.4 (Doc Ref. 5.3). In these respects, the Project is fully compliant with the policy requirement.
	5.49	The certified safeguarding maps depicting the OLS and other criteria (e.g. to minimise “birdstrike” hazards) are deposited with the relevant local planning authorities. Circular 1/200384 provides advice to planning authorities on the official safeguarding of aerodromes and includes a list of the aerodromes which are officially safeguarded. The Circular and CAA guidance also recommends that the operators of aerodromes which are not officially safeguarded should take steps to protect their aerodrome from the effects of possible adverse development by establishing an agreed consultation procedure between themselves and the local planning authority or authorities.	Compliance with the policy is demonstrated by reference to ES Appendix 5.3.4: Major Accidents and Disasters (Doc Ref 5.3) and ES Appendix 6.2.2: Scoping Opinion (Doc Ref. 5.3).
	5.50	There are also “Public Safety Zones” at the end of runways of the busiest airports in the UK, within which development is restricted to minimise risks to people on the ground in the event of an aircraft accident on take-off or landing. Advice is provided on Public Safety Zones in Circular 01/2002.	Consistent with the policy requirement, Public Safety Zones (PSZs) have been considered as an integral part of the Project’s design evolution and this is discussed in ES Appendix 5.3.4 Major Accidents and Disasters (Doc Ref. 5.3).

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			The new standardised PSZs for the main runway are now shorter than the previous ones. Whilst the Project would lead to standardised PSZs being introduced for the northern runway, neither its current, nor reduced standardised PSZs for the main runway extend to affect development proposals in any significant way. The ES (Doc Ref. 5.1) does not therefore include a PSZ assessment.
	5.52	Safe and efficient operations within UK airspace is dependent upon communications, navigation and surveillance (CNS) infrastructure, including radar (often referred to as ‘technical sites’). National Networks infrastructure development may interfere with the operation of radar by limiting the capacity to handle air traffic, and aircraft landing systems. It may also act as a reflector or diffractor of radio signals on which navigational aids rely (an effect which is particularly likely to arise when large structures are located close to radar installations).	In accordance with the policy requirement, full consideration has been given to the risk of impact. The risk has been assessed as being no greater with the Project. This is discussed in ES Appendix 5.3.4: Major Accidents and Disasters (Doc Ref. 5.3).
	5.55	Where the proposed development may have an effect on civil or military aviation and/or other defence assets, an assessment of potential effects should be carried out.	
	5.56	The applicant should consult the MoD, CAA, National Air Traffic Services (NATS) and any aerodrome – licensed or otherwise – likely to be affected by the proposed development in preparing an assessment of the proposal on aviation or other defence interests.	Consultation is covered in ES Appendix 5.3.4: Major Accidents and Disasters (Doc Ref 5.3) and ES Appendix 6.2.2: Scoping Opinion (Doc Ref. 5.3) which demonstrate policy compliance.
	5.57	Any assessment on aviation or other defence interests should include potential impacts during construction and operation of the project upon	In accordance with the policy requirement, full consideration has been

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		the operation of CNS infrastructure, flight patterns (both civil and military), other defence assets and aerodrome operational procedures.	given to the risk of impact. The risk has been assessed as being no greater with the Project. This is discussed in ES Appendix 5.3.4: Major Accidents and Disasters (Doc Ref. 5.3).
	5.59	The Secretary of State should be satisfied that effects on civil and military aviation and other defence assets have been addressed by the applicant and that any necessary assessment of the proposal on aviation or defence interests has been carried out. In particular, it should be satisfied that the proposal has been designed to minimise adverse impacts on the operation and safety of aerodromes and that reasonable mitigation is carried out. It may also be appropriate to expect operators of the aerodrome to consider making reasonable changes to operational procedures. The Secretary of State will have regard to the necessity, acceptability and reasonableness of operational changes to aerodromes, and the risks or harm of such changes when taking decisions. When making such a judgement in the case of military aerodromes, the Secretary of State should have regard to interests of defence and national security.	
	5.61	There are statutory requirements concerning lighting to tall structures. Where lighting is requested on structures that go beyond statutory requirements by any of the relevant aviation and defence consultees, the Secretary of State should be satisfied of the necessity of such lighting taking into account the case put forward by the consultees. The effect of such lighting on the landscape, local residents and ecology may be a relevant consideration, depending on the particular circumstances be a relevant consideration.	The Operational Lighting Framework , forming ES Appendix 5.2.2 (Doc Ref. 5.3), demonstrates that the Project is below the acceptable limits set out for nuisance caused by lighting installation. The Project is considered to be policy compliant in this regard.
	5.62	Where, after reasonable mitigation, operational changes and planning obligations and requirements have been proposed, development consent should not be granted if the Secretary of State considers that: <ul style="list-style-type: none"> a development would prevent a licensed aerodrome from maintaining its licence; 	The policy requirement is addressed by the Needs Case (Doc Ref. 7.2) which demonstrates compliance with the policy.

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		<ul style="list-style-type: none"> the benefits of the proposed development are outweighed by the harm to aerodromes serving business, training or emergency service needs; or the development would significantly impede or compromise the safe and effective use of defence assets or significantly limit military training. 	
	5.64	<p>Mitigation for infringement of OLS may include:</p> <ul style="list-style-type: none"> amendments to layout or scale of infrastructure to reduce the height, provided that it does not result in an unreasonable reduction of capacity or unreasonable constraints on the operation of the proposed national networks infrastructure; changes to operational procedures of the aerodromes in accordance with relevant guidance, provided that safety assurances can be provided by the operator that are acceptable to the CAA where the changes are proposed to a civilian aerodrome (and provided that it does not result in an unreasonable reduction of capacity or unreasonable constraints on the operation of the aerodrome); and upgrading of installation of obstacle lighting and/or by notification in Aeronautical Information Service publications. 	<p>The need for mitigation is considered in Major Accidents and Disasters which forms ES Appendix 5.3.4 (Doc Ref. 5.3).</p>
	5.66	<p>Mitigation for effects on radar and navigational systems may include reducing the scale of a project, although in some cases it is likely to be unreasonable to require mitigation by way of a reduction in the scale of development, for example where this would result in a material reduction in capacity or where operations would be severely constrained. However, there may be exceptional circumstances where a small reduction in capacity or other small change to a project will result in proportionately greater mitigation. In these cases, the Secretary of State may consider that the benefits of the mitigation outweigh the marginal loss, for example, of capacity.</p>	

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	4.75	Government policy is to ensure that, where possible, proportionate protective security measures are designed into new infrastructure projects at an early stage in the project development. Where applications for development consent for infrastructure covered by this NPS relate to potentially 'critical' infrastructure, there may be national security considerations.	Security and safety measures are discussed in Major Accidents and Disasters which forms ES Appendix 5.3.4 (Doc Ref. 5.3) and demonstrates how the Project is policy compliant in this respect.
Community Engagement	5.209	For schemes impacting on the Strategic Road Network, applicants should have regard to DfT Circular 02/2013 The Strategic Road Network and the delivery of sustainable development (or prevailing policy) which sets out the way in which the highway authority for the Strategic Road Network, will engage with communities and the development industry to deliver sustainable development and, thus, economic growth, whilst safeguarding the primary function and purpose of the Strategic Road Network.	Engagement on the Project has been carried out throughout the design process. This has included non-statutory and statutory consultation periods as described in the Planning Statement (Doc Ref. 7.1). The pre-application consultation undertaken is fully documented within the Consultation Report (Doc Ref. 6.1).
Light Pollution	5.84	Where the development is subject to an Environmental Impact Assessment, the applicant should assess any likely significant effects on amenity from emissions of odour, dust, steam, smoke and artificial light and describe these in the Environmental Statement.	The Operational Lighting Framework , forming ES Appendix 5.2.2 (Doc Ref. 5.3), demonstrates that the Project is below the acceptable limits set out for nuisance caused by lighting installation. Therefore, the Project is considered to be policy compliant in this regard.
	5.85	In particular, the assessment provided by the applicant should describe: <ul style="list-style-type: none"> the type and quantity of emissions; aspects of the development which may give rise to emissions during construction, operation and decommissioning; premises or locations that may be affected by the emissions; effects of the emission on identified premises or locations; and measures to be employed in preventing or mitigating the emissions. 	
	5.86	The applicant is advised to consult the relevant local planning authority and, where appropriate, the Environment Agency about the scope and methodology of the assessment.	

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	5.87	The Secretary of State should be satisfied that all reasonable steps have been taken, and will be taken, to minimise any detrimental impact on amenity from emissions of odour, dust, steam, smoke and artificial light. This includes the impact of light pollution from artificial light on local amenity, intrinsically dark landscapes and nature conservation.	
	5.88	If development consent is granted for a project, the Secretary of State should consider whether there is a justification for all of the authorized project (including any associated development) being covered by a defence of statutory authority against nuisance claims. If the Secretary of State cannot conclude that this is justified, then the defence should be disapplied, in whole or in part, through a provision in the Development Consent Order.	
	5.89	The Secretary of State should ensure the applicant has provided sufficient information to show that any necessary mitigation will be put into place. In particular, the Secretary of State should consider whether to require the applicant to abide by a scheme of management and mitigation concerning emissions of odour, dust, steam, smoke, artificial light from the development to reduce any loss to amenity which might arise during the construction and operation of the development. A construction management plan may help codify mitigation.	

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Agriculture and Recreation	84	Planning policies and decisions should enable b) the development and diversification of agricultural and other land-based rural businesses	Detailed Agricultural Land Classification (ALC) surveys of agricultural land are described in Section 19.11 of ES Chapter 19 (Doc Ref. 5.1) and in ES Appendix 19.6.1: Published Agricultural Land Classification Data (Doc Ref. 5.3). An assessment of the likely significant effects of the Project on agricultural land is made at Section 19.9 of ES Chapter 19 (Doc Ref. 5.1).
	98	Access to a network of high quality open spaces and opportunities for sport and physical activity is important for the health and well-being of communities, and can deliver wider benefits for nature and support efforts to address climate change. Planning policies should be based on robust and up-to-date assessments of the need for open space, sport and recreation facilities (including quantitative or qualitative deficits or surpluses) and opportunities for new provision. Information gained from the assessments should be used to determine what open space, sport and recreational provision is needed, which plans should then seek to accommodate	This policy is fully addressed in Sections 19.8 and 19.9 of ES Chapter 19 (Doc Ref. 5.1) where the Replacement Open Space proposals are justified. These proposals include a number of mitigation elements, such as the provision of public open space, provision of new public footpaths and changes to existing public footpaths and management measures to maintain safe public access including a Public Rights of Way Management Strategy (forming ES Appendix 19.8.2 (Doc Ref. 5.3)).
	99	Existing open space, sports and recreational buildings and land, including playing fields, should not be built on unless: <ul style="list-style-type: none"> a) an assessment has been undertaken which has clearly shown the open space, buildings or land to be surplus to requirements; or b) the loss resulting from the proposed development would be replaced by equivalent or better provision in terms of quantity and quality in a suitable location; or c) the development is for alternative sports and recreational provision, the benefits of which clearly outweigh the loss of the current or former use. 	Whilst the Project will result in the loss of 1.18 hectares of agricultural land, no best and most versatile land resource (Grades 1, 2 or 3a land) is to be lost as part of this and this loss would be replaced by 1.7 hectares of better public open space provision in terms of quality

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			and quantity. Therefore, this matter is considered policy compliant.
	100	Planning policies and decisions should protect and enhance public rights of way and access, including taking opportunities to provide better facilities for users, for example by adding links to existing rights of way networks including National Trails.	<p>The mitigation measures set out in Section 19.8 of ES Chapter 19 (Doc Ref. 5.1), together with impacts on Public Rights of Way as set out in ES Appendix 19.8.2: Public Rights of Way Management Strategy (Doc Ref. 5.3) describe the beneficial effects of the Project and the compliance with the policy.</p> <p>The Project includes a number of mitigation elements, such as the provision of public open space, provision of new and changes to existing public footpaths and management measures to maintain safe public access including a Public Rights of Way Management Strategy contained within ES Appendix 19.8.2 (Doc Ref. 5.3). The Project has been assessed to comply with the policy requirement.</p>
	120	Planning policies and decisions should: <ol style="list-style-type: none"> a) encourage multiple benefits from both urban and rural land, including through mixed use schemes and taking opportunities to achieve net environmental gains – such as developments that would enable new habitat creation or improve public access to the countryside; 	<p>The Project provides replacement open space in a greater quality and quantity than that which will be lost, enhance public rights of way near the application site and achieve a Biodiversity Net Gain (BNG). This is detailed within Section</p>

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		<ul style="list-style-type: none"> b) recognise that some undeveloped land can perform many functions, such as for wildlife, recreation, flood risk mitigation, cooling/shading, carbon storage or food production; c) give substantial weight to the value of using suitable brownfield land within settlements for homes and other identified needs, and support appropriate opportunities to remediate despoiled, degraded, derelict, contaminated or unstable land; d) promote and support the development of under-utilised land and buildings, especially if this would help to meet identified needs for housing where land supply is constrained and available sites could be used more effectively (for example converting space above shops, and building on or above service yards, car parks, lock-ups and railway infrastructure); and e) support opportunities to use the airspace above existing residential and commercial premises for new homes. In particular, they should allow upward extensions where the development would be consistent with the prevailing height and form of neighbouring properties and the overall street scene, is well designed (including complying with any local design policies and standards), and can maintain safe access and egress for occupiers. 	<p>9.8 of ES Chapter 9 and Section 19.8 of ES Chapter 19 (Doc Ref. 5.1). The Project complies with part (a) of the policy in relation to agricultural and recreation matters.</p>
	174	<ul style="list-style-type: none"> b) minimising the intrinsic character and beauty of the countryside, and the wider benefits from natural capital and ecosystem services – including the economic and other benefits of the best and most versatile agricultural land, and of trees and woodland; 	<p>Detailed Agricultural Land Classification (ALC) surveys of agricultural land are described in Sections 19.6 and 19.11 of ES Chapter 19 (Doc Ref. 5.1) and in ES Appendix 19.6.1: Published Agricultural Land Classification Data (Doc Ref. 5.3) and ES Appendix 19.6.2: Soil Survey Results (Doc Ref. 5.3).</p>

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			<p>The mitigation/enhancement measures adopted as part of the Project are described in Section 19.8 of ES Chapter 19 (Doc Ref. 5.1). An assessment of the likely significant effects of the Project on agricultural land is made at Section 19.9 of ES Chapter 19 (Doc Ref. 5.1).</p> <p>The ES (Doc Ref. 5.1) demonstrates compliance of the Project with the policy in terms of utilising areas of poorer quality land and minimizing the impact on soil quality.</p>
Air Quality	105	<p>The planning system should actively manage patterns of growth in support of these objectives. Significant development should be focused on locations which are or can be made sustainable, through limiting the need to travel and offering a genuine choice of transport modes. This can help to reduce congestion and emissions, and improve air quality and public health. However, opportunities to maximise sustainable transport solutions will vary between urban and rural areas, and this should be taken into account in both plan-making and decision-making.</p>	<p>The Transport Assessment (TA) (Doc Ref. 7.4) and Surface Access Commitments (SACs) comprising ES Appendix 5.4.1 (Doc Ref. 5.3) form part of the documentation for the application for development consent. The documents show the predicted level of trips by the range of travel modes, which are based on specific targets for minimising the proportion of journeys made by non-car modes. Predicted traffic flows on the highway network in the vicinity of the airport are presented in ES Appendix 12.9.1: Highway Flows and Driver Delay Review (Doc Ref. 5.3). These flows reflect the targets</p>

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			that have been adopted to achieve the mode shift.
	174	e) preventing new and existing development from contributing to, being put at unacceptable risk from, or being adversely affected by, unacceptable levels of soil, air, water or noise pollution or land instability. Development should, wherever possible, help to improve local environmental conditions such as air and water quality, taking into account relevant information such as river basin management plans;	A range of mitigation measures are proposed to address impacts to the natural and local environment. These are detailed in Section 13.9 of ES Chapter 13 (Doc Ref. 5.1). The measures include the use of low or zero emissions construction equipment and vehicles and a commitment by GAL to decarbonisation outcomes through its Carbon Action Plan (provided as ES Appendix 5.4.2 (Doc Ref. 5.3)).
	186	Planning policies and decisions should sustain and contribute towards compliance with relevant limit values or national objectives for pollutants, taking into account the presence of Air Quality Management Areas and Clean Air Zones, and the cumulative impacts from individual sites in local areas. Opportunities to improve air quality or mitigate impacts should be identified, such as through traffic and travel management, and green infrastructure provision and enhancement. So far as possible these opportunities should be considered at the plan-making stage, to ensure a strategic approach and limit the need for issues to be reconsidered when determining individual applications. Planning decisions should ensure that any new development in Air Quality Management Areas and Clean Air Zones is consistent with the local air quality action plan.	Additionally, further mitigation and good practice measures during the construction and operational assessment phases of the Project are set out in the Code of Construction Practice (CoCP) provided as ES Appendix 5.3.2 (Doc Ref. 5.3) and in the Air Quality Construction Period Mitigation provided as ES Appendix 13.8.1 (Doc Ref. 5.3).
Ecology and Nature Conservation	174	a) protecting and enhancing valued landscapes, sites of biodiversity or geological value and soils (in a manner commensurate with their statutory status or identified quality in the development plan).	Section 9.9 of ES Chapter 9 (Doc Ref. 5.1) provides an assessment of the potential effects that the Project will have on designated nature conservation sites, habitats and species as per the policies listed within the Plan. These
	176	Great weight should be given to conserving and enhancing landscape and scenic beauty in National Parks, the Broads and Areas of Outstanding Natural Beauty which have the highest status of protection in relation to these issues. The conservation and enhancement of	

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		wildlife and cultural heritage are also important considerations in these areas, and should be given great weight in National Parks.	effects are summarised in Section 9.13 of ES Chapter 9 (Doc Ref. 5.1). In addition to the mitigation measures set out in Section 9.8 of ES Chapter 9 (Doc Ref. 5.1), further such measures are outlined within the Outline Landscape and Ecology Management Plan (LEMP) which comprises ES Appendix 8.8.1 (Doc Ref. 5.3). These matters are considered policy compliant.
	177	When considering applications for development within National Parks, the Broads and Areas of Outstanding Natural Beauty, permission should be refused for major development ⁶⁰ other than in exceptional circumstances, and where it can be demonstrated that the development is in the public interest. Consideration of such applications should include an assessment of: a) the need for the development, including in terms of any national considerations, and the impact of permitting it, or refusing it, upon the local economy; b) the cost of, and scope for, developing outside the designated area, or meeting the need for it in some other way; and c) any detrimental effect on the environment, the landscape and recreational opportunities, and the extent to which that could be moderated.	
	180	When determining planning applications, local planning authorities should apply the following principles: a) if significant harm to biodiversity resulting from a development cannot be avoided (through locating on an alternative site with less harmful impacts), adequately mitigated, or, as a last resort, compensated for, then planning permission should be refused; b) development on land within or outside a Site of Special Scientific Interest, and which is likely to have an adverse effect on it (either individually or in combination with other developments), should not normally be permitted. The only exception is where the benefits of the development in the location proposed clearly outweigh both its likely impact on the features of the site that make it of special scientific interest, and any broader impacts on the national network of Sites of Special Scientific Interest;	

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		<p>c) development resulting in the loss or deterioration of irreplaceable habitats (such as ancient woodland and ancient or veteran trees) should be refused, unless there are wholly exceptional reasons and a suitable compensation strategy exists; and</p> <p>d) development whose primary objective is to conserve or enhance biodiversity should be supported; while opportunities to improve biodiversity in and around developments should be integrated as part of their design, especially where this can secure measurable net gains for biodiversity or enhance public access to nature where this is appropriate.</p>	
	181	<p>The following should be given the same protection as habitats sites:</p> <p>a) potential Special Protection Areas and possible Special Areas of Conservation;</p> <p>b) listed or proposed Ramsar sites; and</p> <p>c) sites identified, or required, as compensatory measures for adverse effects on habitats sites, potential Special Protection Areas, possible Special Areas of Conservation, and listed or proposed Ramsar sites.</p>	
	182	<p>The presumption in favour of sustainable development does not apply where the plan or project is likely to have a significant effect on a habitats site (either alone or in combination with other plans or projects), unless an appropriate assessment has concluded that the plan or project will not adversely affect the integrity of the habitats site.</p>	
Climate Change and Greenhouse Gases	152	<p>The planning system should support the transition to a low carbon future in a changing climate, taking full account of flood risk and coastal change. It should help to: shape places in ways that contribute to radical reductions in greenhouse gas emissions, minimise vulnerability and improve resilience; encourage the reuse of existing resources, including the conversion of existing buildings; and support renewable and low carbon energy and associated infrastructure.</p>	<p>The assessment methodology outlined in ES Chapter 15 (Doc Ref. 5.1) includes identification of climate change impacts including UKCP18 (the latest set of UK climate projections) reflecting a number of time periods, covering the lifetime of the Project, as described in</p>

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	154	New development should be planned for in ways that: a) avoid increased vulnerability to the range of impacts arising from climate change. When new development is brought forward in areas which are vulnerable, care should be taken to ensure that risks can be managed through suitable adaptation measures, including through the planning of green infrastructure; and b) can help to reduce greenhouse gas emissions, such as through its location, orientation and design. Any local requirements for the sustainability of buildings should reflect the Government's policy for national technical standards.	<p>Section 15.5 of ES Chapter 15 (Doc Ref. 5.1). In Section 15.8 of ES Chapter 15 (Doc Ref. 5.1), it is set out how embedded environmental measures will be implemented in relation to climate change, compliant with the policy requirement.</p> <p>Mitigation measures suggested in the policy have been considered in the embedded and additional measures to mitigate GHG emissions from the construction and operation of the Project and these are presented in Section 16.8 and Section 16.10 of ES Chapter 16 (Doc Ref. 5.1). These measures comprise commitments to achieving specific levels of lower emission transport modes for passengers and staff accessing the airport and to a carbon budget for construction, surface access and aviation processes. These commitments have been collated into the Carbon Action Plan and the Surface Access Commitments, respectively comprising ES Appendix 5.4.2 (Doc Ref. 5.3) and ES Appendix 5.4.1 (Doc Ref. 5.3).</p>
	155	To help increase the use and supply of renewable and low carbon energy and heat, plans should: <ul style="list-style-type: none"> a) provide a positive strategy for energy from these sources, that maximises the potential for suitable development, while ensuring that adverse impacts are addressed satisfactorily (including cumulative landscape and visual impacts); b) consider identifying suitable areas for renewable and low carbon energy sources, and supporting infrastructure, where this would help secure their development; and c) identify opportunities for development to draw its energy supply from decentralised, renewable or low carbon energy supply systems and for co-locating potential heat customers and suppliers. 	
	157	In determining planning applications, local planning authorities should expect new development to: <ul style="list-style-type: none"> a) comply with any development plan policies on local requirements for decentralised energy supply unless it can be demonstrated by the applicant, having regard to the type of development involved and its design, that this is not feasible or viable; and b) take account of landform, layout, building orientation, massing and landscaping to minimise energy consumption. 	

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Historic Environment	190	<p>Plans should set out a positive strategy for the conservation and enjoyment of the historic environment, including heritage assets most at risk through neglect, decay or other threats. This strategy should take into account:</p> <ul style="list-style-type: none"> a) the desirability of sustaining and enhancing the significance of heritage assets, and putting them to viable uses consistent with their conservation; b) the wider social, cultural, economic and environmental benefits that conservation of the historic environment can bring; c) the desirability of new development making a positive contribution to local character and distinctiveness; and d) opportunities to draw on the contribution made by the historic environment to the character of a place. 	<p>The requirements of the NPPF have been accounted for in this assessment, with particular regard given to establishing the significance of designated and non-designated assets and their settings. The significance of heritage assets and their settings is summarised within Section 7.6 of ES Chapter 7 (Doc Ref. 5.1) and presented within an appropriate desk-based assessment and a summary of the results of field evaluations formed of the Historic Environment Baseline Report comprising ES Appendix 7.6.1 (Doc Ref. 5.3).</p> <p>The approach to the assessment of the likely significant effects is described in Section 7.9 of ES Chapter 7 (Doc Ref. 5.1). The assessment identifies impacts and effects in terms of their nature (direct/indirect) and duration.</p> <p>Opportunities for enhancing the significance of relevant heritage assets have been considered. Where such opportunities are possible, these are described in Section 7.8 of ES Chapter 7 (Doc Ref. 5.1) of this chapter.</p>
	194	<p>In determining applications, local planning authorities should require an applicant to describe the significance of any heritage assets affected, including any contribution made by their setting. The level of detail should be proportionate to the assets' importance and no more than is sufficient to understand the potential impact of the proposal on their significance. As a minimum the relevant historic environment record should have been consulted and the heritage assets assessed using appropriate expertise where necessary. Where a site on which development is proposed includes, or has the potential to include, heritage assets with archaeological interest, local planning authorities should require developers to submit an appropriate desk-based assessment and, where necessary, a field evaluation.</p>	
	195	<p>Local planning authorities should identify and assess the particular significance of any heritage asset that may be affected by a proposal (including by development affecting the setting of a heritage asset) taking account of the available evidence and any necessary expertise. They should take this into account when considering the impact of a</p>	

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		proposal on a heritage asset, to avoid or minimise any conflict between the heritage asset's conservation and any aspect of the proposal.	Section 8.13 of the Planning Statement (Doc Ref. 7.1) considers the effects of the Project on heritage assets whilst Section 9 of the Planning Statement (Doc Ref. 7.1) weighs these effects against the public benefits of the Project, as required by these policies. These matters are therefore considered policy compliant.
	197	In determining applications, local planning authorities should take account of: <ol style="list-style-type: none"> the desirability of sustaining and enhancing the significance of heritage assets and putting them to viable uses consistent with their conservation; the positive contribution that conservation of heritage assets can make to sustainable communities including their economic vitality; and the desirability of new development making a positive contribution to local character and distinctiveness. 	
	199	When considering the impact of a proposed development on the significance of a designated heritage asset, great weight should be given to the asset's conservation (and the more important the asset, the greater the weight should be). This is irrespective of whether any potential harm amounts to substantial harm, total loss or less than substantial harm to its significance.	
	200	Any harm to, or loss of, the significance of a designated heritage asset (from its alteration or destruction, or from development within its setting), should require clear and convincing justification. Substantial harm to or loss of: <ol style="list-style-type: none"> grade II listed buildings, or grade II registered parks or gardens, should be exceptional; assets of the highest significance, notably scheduled monuments, protected wreck sites, registered battlefields, grade I and II* listed buildings, grade I and II* registered parks and gardens, and World Heritage Sites, should be wholly exceptional. 	
	201	Where a proposed development will lead to substantial harm to (or total loss of significance of) a designated heritage asset, local planning	

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		<p>authorities should refuse consent, unless it can be demonstrated that the substantial harm or total loss is necessary to achieve substantial public benefits that outweigh that harm or loss, or all of the following apply:</p> <ul style="list-style-type: none"> a) the nature of the heritage asset prevents all reasonable uses of the site; and b) no viable use of the heritage asset itself can be found in the medium term through appropriate marketing that will enable its conservation; and c) conservation by grant-funding or some form of not for profit, charitable or public ownership is demonstrably not possible; and d) the harm or loss is outweighed by the benefit of bringing the site back into use. 	
	202	Where a development proposal will lead to less than substantial harm to the significance of a designated heritage asset, this harm should be weighed against the public benefits of the proposal including, where appropriate, securing its optimum viable use.	
	203	The effect of an application on the significance of a non-designated heritage asset should be taken into account in determining the application. In weighing applications that directly or indirectly affect non-designated heritage assets, a balanced judgement will be required having regard to the scale of any harm or loss and the significance of the heritage asset.	
	208	Local planning authorities should assess whether the benefits of a proposal for enabling development, which would otherwise conflict with planning policies but which would secure the future conservation of a heritage asset, outweigh the disbenefits of departing from those policies.	
Design	125	Area-based character assessments, design guides and codes and masterplans can be used to help ensure that land is used efficiently while also creating beautiful and sustainable places. Where there is an	The importance of good design is acknowledged in Section 7 of the Planning Statement (Doc Ref. 7.1) and

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		<p>existing or anticipated shortage of land for meeting identified housing needs, it is especially important that planning policies and decisions avoid homes being built at low densities, and ensure that developments make optimal use of the potential of each site. In these circumstances:</p> <ul style="list-style-type: none"> a) plans should contain policies to minimise the use of land in their area and meet as much of the identified need for housing as possible. This will be tested robustly at examination, and should include the use of minimum density standards for city and town centres and other locations that are well served by public transport. These standards should seek a significant uplift in the average density of residential development within these areas, unless it can be shown that there are strong reasons why this would be inappropriate; b) the use of minimum density standards should also be considered for other parts of the plan area. It may be appropriate to set out a range of densities that reflect the accessibility and potential of different areas, rather than one broad density range; and c) local planning authorities should refuse applications which they consider fail to make efficient use of land, taking into account the policies in this Framework. In this context, when considering applications for housing, authorities should take a flexible approach in applying policies or guidance relating to daylight and sunlight, where they would otherwise inhibit making efficient use of a site (as long as the resulting scheme would provide acceptable living standards). 	<p>the design of the Project, including its evolution, is set out and justified in full in the Design and Access Statement (Doc Ref. 7.3). Additionally, the Sustainability Statement which forms Planning Statement Appendix D (Doc Ref. 7.1) considers how the Project addresses policy and legislation relevant to sustainability.</p>
	126	<p>The creation of high quality, beautiful and 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</p>	

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		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.	
	130	<p>Planning policies and decisions should ensure that developments:</p> <ul style="list-style-type: none"> a) will function well and add to the overall quality of the area, not just for the short term but over the lifetime of the development; b) are visually attractive as a result of good architecture, layout and appropriate and effective landscaping; c) are sympathetic to local character and history, including the surrounding built environment and landscape setting, while not preventing or discouraging appropriate innovation or change (such as increased densities); d) establish or maintain a strong sense of place, using the arrangement of streets, spaces, building types and materials to create attractive, welcoming and distinctive places to live, work and visit; e) optimise the potential of the site to accommodate and sustain an appropriate amount and mix of development (including green and other public space) and support local facilities and transport networks; and f) create places that are safe, inclusive and accessible and which promote health and well-being, with a high standard of amenity for existing and future users; and where crime and disorder, and the fear of crime, do not undermine the quality of life or community cohesion and resilience. 	
	131	Trees make an important contribution to the character and quality of urban environments, and can also help mitigate and adapt to climate change. Planning policies and decisions should ensure that new streets are tree-lined ⁵⁰ , that opportunities are taken to incorporate trees elsewhere in developments (such as parks and community orchards), that appropriate measures are in place to secure the long-term	

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		maintenance of newly-planted trees, and that existing trees are retained wherever possible. Applicants and local planning authorities should work with highways officers and tree officers to ensure that the right trees are planted in the right places, and solutions are found that are compatible with highways standards and the needs of different users.	
	132	Design quality should be considered throughout the evolution and assessment of individual proposals. Early discussion between applicants, the local planning authority and local community about the design and style of emerging schemes is important for clarifying expectations and reconciling local and commercial interests. Applicants should work closely with those affected by their proposals to evolve designs that take account of the views of the community. Applications that can demonstrate early, proactive and effective engagement with the community should be looked on more favourably than those that cannot.	
	134	Development that is not well designed should be refused, especially where it fails to reflect local design policies and government guidance on design, taking into account any local design guidance and supplementary planning documents such as design guides and codes. Conversely, significant weight should be given to: <ul style="list-style-type: none"> a) development which reflects local design policies and government guidance on design, taking into account any local design guidance and supplementary planning documents such as design guides and codes; and/or b) outstanding or innovative designs which promote high levels of sustainability, or help raise the standard of design more generally in an area, so long as they fit in with the overall form and layout of their surroundings. 	
Socio-economics	8	Achieving sustainable development means that the planning system has three overarching objectives, which are interdependent and need to be	The Needs Case (Doc Ref. 7.2) addresses this policy and ES Chapter

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		<p>pursued in mutually supportive ways (so that opportunities can be taken to secure net gains across each of the different objectives):</p> <p>a) an economic objective – to help build a strong, responsive and competitive economy, by ensuring that sufficient land of the right types is available in the right places and at the right time to support growth, innovation and improved productivity; and by identifying and coordinating the provision of infrastructure;</p> <p>b) a social objective – to support strong, vibrant and healthy communities, by ensuring that a sufficient number and range of homes can be provided to meet the needs of present and future generations; and by fostering well-designed, beautiful and safe places, with accessible services and open spaces that reflect current and future needs and support communities’ health, social and cultural well-being; and</p> <p>c) an environmental objective – to protect and enhance our natural, built and historic environment; including making effective use of land, improving biodiversity, using natural resources prudently, minimising waste and pollution, and mitigating and adapting to climate change, including moving to a low carbon economy.</p>	<p>17 (Doc Ref. 5.1) presents the assessment of effects relating to economics and employment. The Project has been assessed as delivering significant benefits for the local economy in compliance with the NPPF.</p> <p>The Project is supported by an Employment, Skills and Business Strategy (ES Appendix 17.8.1 (Doc Ref. 5.3)). The strategy sets out measures to enable the local workforce to attain skills relevant to employment opportunities arising from airport growth and will ensure the local area benefits from new employment opportunities consistent with the policy objective.</p>
	81	<p>Planning policies and decisions should help create the conditions in which businesses can invest, expand and adapt. Significant weight should be placed on the need to support economic growth and productivity, taking into account both local business needs and wider opportunities for development. The approach taken should allow each area to build on its strengths, counter any weaknesses and address the challenges of the future. This is particularly important where Britain can be a global leader in driving innovation, and in areas with high levels of productivity, which should be able to capitalise on their performance and potential.</p>	

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	83	Planning policies and decisions should recognise and address the specific locational requirements of different sectors. This includes making provision for clusters or networks of knowledge and data-driven, creative or high technology industries; and for storage and distribution operations at a variety of scales and in suitably accessible locations.	
	92	Planning policies and decisions should aim to achieve healthy, inclusive and safe places which: a) promote social interaction, including opportunities for meetings between people who might not otherwise come into contact with each other – for example through mixed-use developments, strong neighbourhood centres, street layouts that allow for easy pedestrian and cycle connections within and between neighbourhoods, and active street frontages; b) are safe and accessible, so that crime and disorder, and the fear of crime, do not undermine the quality of life or community cohesion – for example through the use of attractive, well-designed, clear and legible pedestrian and cycle routes, and high quality public space, which encourage the active and continual use of public areas; and c) enable and support healthy lifestyles, especially where this would address identified local health and well-being needs – for example through the provision of safe and accessible green infrastructure, sports facilities, local shops, access to healthier food, allotments and layouts that encourage walking and cycling.	
	106	f) recognise the importance of maintaining a national network of general aviation airfields, and their need to adapt and change over time – taking into account their economic value in serving business, leisure, training and emergency service needs, and the Government’s General Aviation Strategy	
	187	Planning policies and decisions should ensure that new development can be integrated effectively with existing businesses and community	

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		facilities (such as places of worship, pubs, music venues and sports clubs). Existing businesses and facilities should not have unreasonable restrictions placed on them as a result of development permitted after they were established. Where the operation of an existing business or community facility could have a significant adverse effect on new development (including changes of use) in its vicinity, the applicant (or 'agent of change') should be required to provide suitable mitigation before the development has been completed.	
Water Environment	174	e) preventing new and existing development from contributing to, being put at unacceptable risk from, or being adversely affected by, unacceptable levels of soil, air, water or noise pollution or land instability. Development should, wherever possible, help to improve local environmental conditions such as air and water quality, taking into account relevant information such as river basin management plans; and	The drainage design for the Project applies a hierarchical approach and includes the use of sustainable drainage techniques. The measures are described in Section 11.8 of ES Chapter 11 (Doc Ref. 5.1). The sequential approach has been applied in relation to the assessment of flood risk in accordance with the policy requirement. The Flood Risk Assessment (FRA) is provided at ES Appendix 11.9.6 (Doc Ref. 5.3).
	169	Major developments should incorporate sustainable drainage systems unless there is clear evidence that this would be inappropriate. The systems used should: <ul style="list-style-type: none"> a) take account of advice from the lead local flood authority; b) have appropriate proposed minimum operational standards; c) have maintenance arrangements in place to ensure an acceptable standard of operation for the lifetime of the development; and d) where possible, provide multifunctional benefits. 	
	167	When determining any planning applications, local planning authorities should ensure that flood risk is not increased elsewhere. Where appropriate, applications should be supported by a site-specific flood-risk assessment ⁵⁵ . Development should only be allowed in areas at risk of flooding where, in the light of this assessment (and the sequential and exception tests, as applicable) it can be demonstrated that:	

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		<ul style="list-style-type: none"> a) within the site, the most vulnerable development is located in areas of lowest flood risk, unless there are overriding reasons to prefer a different location; b) the development is appropriately flood resistant and resilient such that, in the event of a flood, it could be quickly brought back into use without significant refurbishment; c) it incorporates sustainable drainage systems, unless there is clear evidence that this would be inappropriate; d) any residual risk can be safely managed; and e) safe access and escape routes are included where appropriate, as part of an agreed emergency plan. 	
	159	Inappropriate development in areas at risk of flooding should be avoided by directing development away from areas at highest risk (whether existing or future). Where development is necessary in such areas, the development should be made safe for its lifetime without increasing flood risk elsewhere.	
Health and Wellbeing	92	<p>Planning policies and decisions should aim to achieve healthy, inclusive and safe places which:</p> <ul style="list-style-type: none"> a) promote social interaction, including opportunities for meetings between people who might not otherwise come into contact with each other – for example through mixed-use developments, strong neighbourhood centres, street layouts that allow for easy pedestrian and cycle connections within and between neighbourhoods, and active street frontages; b) are safe and accessible, so that crime and disorder, and the fear of crime, do not undermine the quality of life or community cohesion – for example through the use of attractive, well-designed, clear and legible pedestrian and cycle routes, and high quality public space, which encourage the active and continual use of public areas; and 	<p>The relevant effects and impacts relating to health, as required to be considered by paragraphs 92 and 93, are assessed in Section 18.8 of ES Chapter 18 (Doc Ref. 5.1).</p> <p>The means of mitigation of adverse health impacts to achieve these policies are set out in Section 18.7 of ES Chapter 18 (Doc Ref. 5.1).</p>

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		<p>c) enable and support healthy lifestyles, especially where this would address identified local health and well-being needs – for example through the provision of safe and accessible green infrastructure, sports facilities, local shops, access to healthier food, allotments and layouts that encourage walking and cycling.</p>	<p>Cumulative impacts on health are then considered and assessed in Section 18.10 of ES Chapter 18 (Doc Ref. 5.1).</p>
	93	<p>To provide the social, recreational and cultural facilities and services the community needs, planning policies and decisions should:</p> <p>a) plan positively for the provision and use of shared spaces, community facilities (such as local shops, meeting places, sports venues, open space, cultural buildings, public houses and places of worship) and other local services to enhance the sustainability of communities and residential environments;</p> <p>b) take into account and support the delivery of local strategies to improve health, social and cultural well-being for all sections of the community;</p> <p>c) guard against the unnecessary loss of valued facilities and services, particularly where this would reduce the community’s ability to meet its day-to-day needs;</p> <p>d) ensure that established shops, facilities and services are able to develop and modernise, and are retained for the benefit of the community; and</p> <p>e) ensure an integrated approach to considering the location of housing, economic uses and community facilities and services.</p>	
Landscape, Townscape and Visual Resources	174	<p>b) recognising the intrinsic character and beauty of the countryside, and the wider benefits from natural capital and ecosystem services – including the economic and other benefits of the best and most versatile agricultural land, and of trees and woodland;</p>	<p>Section 8.6 of ES Chapter 8 (Doc Ref. 5.1) provides a description of the baseline conditions within the site and study area, noting particularly valued landscapes and scenic quality. Section 8.9 of ES Chapter 8 (Doc Ref. 5.1) draws on this baseline to inform</p>

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			<p>judgements on the value of a landscape or visual receptor and the magnitude of impact on that landscape or visual receptor.</p> <p>The Project has been sensitively designed as described in ES Chapter 8 (Doc Ref. 5.1), in accordance with the requirement of paragraph 174.</p>
Noise and Vibration	174	e) preventing new and existing development from contributing to, being put at unacceptable risk from, or being adversely affected by, unacceptable levels of soil, air, water or noise pollution or land instability. Development should, wherever possible, help to improve local environmental conditions such as air and water quality, taking into account relevant information such as river basin management plans; and	<p>Section 14.9 of ES Chapter 14 (Doc Ref. 5.1) assesses noise effects due to the Project. Section 14.8 of ES Chapter 14 (Doc Ref. 5.1) provides details on how noise effects will be minimised in accordance with the policy requirements of the NPPF.</p>
	185	<p>Planning policies and decisions should also ensure that new development is appropriate for its location taking into account the likely effects (including cumulative effects) of pollution on health, living conditions and the natural environment, as well as the potential sensitivity of the site or the wider area to impacts that could arise from the development. In doing so they should:</p> <p>a) mitigate and reduce to a minimum potential adverse impacts resulting from noise from new development – and avoid noise giving rise to significant adverse impacts on health and the quality of life⁶⁵;</p> <p>b) identify and protect tranquil areas which have remained relatively undisturbed by noise and are prized for their recreational and amenity value for this reason;</p>	
Ground Conditions	174	a) protecting and enhancing valued landscapes, sites of biodiversity or geological value and soils (in a manner commensurate with their statutory status or identified quality in the development plan);	A geotechnical assessment has been undertaken which takes into account potential land stability issues. Section

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		f) remediating and mitigating despoiled, degraded, derelict, contaminated and unstable land, where appropriate.	<p>10.8 of ES Chapter 10 (Doc Ref. 5.1) summarises how land stability risks would be mitigated and minimised. This discussion is supported by the Preliminary Risk Assessment which has appropriately accounted for the Site's surrounding context and which forms ES Appendix 10.9.1 (Doc Ref. 5.3). This has ensured that appropriate technical and environmental advice has informed the assessment of ground conditions. The Preliminary Risk Assessment has identified that there are areas at moderate risk for compressibility across the site which appear to correspond to BGS mapped areas of Alluvium as well as a moderate risk of slope instability for a small area along the A23 embankment. The mitigation measures incorporated to minimise impacts relating to land instability are set out in Section 10.8 of ES Chapter 10 (Doc Ref. 5.1). The assessment demonstrates compliance with NPPF policy.</p> <p>In accordance with the policy requirement, a Preliminary Risk Assessment (ES Appendix 10.9.1) (Doc Ref. 5.3) has appraised potential</p>
	183	<p>Planning policies and decisions should ensure that:</p> <p>a) a site is suitable for its proposed use taking account of ground conditions and any risks arising from land instability and contamination. This includes risks arising from natural hazards or former activities such as mining, and any proposals for mitigation including land remediation (as well as potential impacts on the natural environment arising from that remediation);</p> <p>b) after remediation, as a minimum, land should not be capable of being determined as contaminated land under Part IIA of the Environmental Protection Act 1990; and</p> <p>c) adequate site investigation information, prepared by a competent person, is available to inform these assessments.</p>	
	184	Where a site is affected by contamination or land stability issues, responsibility for securing a safe development rests with the developer and/or landowner.	
	210	c) Planning policies should safeguard mineral resources by defining Mineral Safeguarding Areas and Mineral Consultation Areas; and adopt appropriate policies so that known locations of specific minerals resources of local and national importance are not sterilised by non-mineral development where this should be avoided (whilst not creating a presumption that the resources defined will be worked);	

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			<p>areas of land contamination likely to be affected by the Project in accordance with statutory guidance and best practice and forms the main source of information in defining the Baseline Environment that is described in Section 10.6 of ES Chapter 10 (Doc Ref. 5.1). In response to the findings of a number of historical and current potential sources of contamination across the Project site a series of mitigation measures have been adopted as part of the project to ensure the land contamination risk has been suitably addressed. The mitigation measures incorporated to minimise these risks are set out in Section 10.8 of ES Chapter 10 (Doc Ref. 5.1) and principally comprises a remediation strategy.</p> <p>Mineral resources are addressed in Section 10.9 of ES Chapter 10 (Doc Ref. 5.1). Preliminary enquiries have been made with third party mineral users regarding opportunities to use the material excavated from the Brick Clay Resource Mineral Safeguarded Area. This will be taken forward within the Materials Management Plan which forms a part of the Construction Code</p>

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			of Practice (CoCP) forming ES Appendix 5.3.2 (Doc Ref. 5.3).
Traffic and Transport	104	<p>Transport issues should be considered from the earliest stages of plan-making and development proposals, so that:</p> <ul style="list-style-type: none"> a) the potential impacts of development on transport networks can be addressed; b) opportunities from existing or proposed transport infrastructure, and changing transport technology and usage, are realised – for example in relation to the scale, location or density of development that can be accommodated; c) opportunities to promote walking, cycling and public transport use are identified and pursued; d) the environmental impacts of traffic and transport infrastructure can be identified, assessed and taken into account – including appropriate opportunities for avoiding and mitigating any adverse effects, and for net environmental gains; and e) patterns of movement, streets, parking and other transport considerations are integral to the design of schemes, and contribute to making high quality places. 	<p>In accordance with paragraph 104, a Transport Assessment (TA) (Doc Ref. 7.4) and Surface Access Commitments (SACs) forming ES Appendix 5.4.1 (Doc Ref. 5.3) have been prepared in support of the Project. These documents incorporate discussion around increasing the proportion of air passengers travelling to and from the airport by public transport. In recognition of the fact that there will still be a significant number of passengers travelling to and from the airport by car, a number of highways interventions are proposed to provide mitigation for the increased volumes of traffic on roads in the locality. The highway interventions, for both construction and operational phases of the Project, are described and listed in Section 5.2 of ES Chapter 5 (Doc Ref. 5.1), in Sections 12.8 and 12.9 of ES Chapter 12 (Doc Ref. 5.1) and in the Surface Access Commitments formed of ES Appendix 5.4.1 (Doc Ref. 5.3). The various assessments demonstrate</p>
	105	<p>The planning system should actively manage patterns of growth in support of these objectives. Significant development should be focused on locations which are or can be made sustainable, through limiting the need to travel and offering a genuine choice of transport modes. This can help to reduce congestion and emissions, and improve air quality and public health. However, opportunities to maximise sustainable transport solutions will vary between urban and rural areas, and this should be taken into account in both plan-making and decision-making.</p>	
	113	<p>All developments that will generate significant amounts of movement should be required to provide a travel plan, and the application should</p>	

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		be supported by a transport statement or transport assessment so that the likely impacts of the proposal can be assessed.	compliance of the Project with paragraphs 104 to 113.
Waste and Resource Management	8	a. an economic objective – to help build a strong, responsive and competitive economy, by ensuring that sufficient land of the right types is available in the right places and at the right time to support growth, innovation and improved productivity; and by identifying and coordinating the provision of infrastructure;	Details of the management of waste are set out in ES Appendix 5.3.2: CoCP Annex 5 - Construction Resources and Waste Management Plan (Doc Ref. 5.3). The document presents arrangements that are proposed for managing waste produced including information on the proposed waste recovery and disposal system for all waste generated by the Project. Therefore, this matter is considered policy compliant.
	210	b. The environmental objective set out in paragraph 210 of the NPPF is to “so far as practicable, take account of the contribution that substitute or secondary and recycled materials and minerals waste would make to the supply of materials, before considering extraction of primary materials, whilst aiming to source minerals supplies indigenously.”	
Contributions	55	Local planning authorities should consider whether otherwise unacceptable development could be made acceptable through the use of conditions or planning obligations. Planning obligations should only be used where it is not possible to address unacceptable impacts through a planning condition.	In accordance with paragraph 55, full details of the proposed noise insulation scheme and associated community compensation, including details of consultation, fund sourcing, fund size and duration, eligibility and the means of delivering and securing the Project are set out in Section 8.20 of the Planning Statement (Doc Ref. 7.1).
Safety and Security	45	Local planning authorities should consult the appropriate bodies when considering applications for the siting of, or changes to, major hazard sites, installations or pipelines, or for development around them.	These matters are addressed in Major Accidents and Disasters which forms ES Appendix 5.3.4 (Doc Ref. 5.3).
	97	Planning policies and decisions should promote public safety and take into account wider security and defence requirements by:	

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		<ul style="list-style-type: none"> a) anticipating and addressing possible malicious threats and natural hazards, especially in locations where large numbers of people are expected to congregate. Policies for relevant areas (such as town centre and regeneration frameworks), and the layout and design of developments, should be informed by the most up-to-date information available from the police and other agencies about the nature of potential threats and their implications. This includes appropriate and proportionate steps that can be taken to reduce vulnerability, increase resilience and ensure public safety and security; and b) recognising and supporting development required for operational defence and security purposes, and ensuring that operational sites are not affected adversely by the impact of other development proposed in the area. 	
	183	<p>Planning policies and decisions should ensure that:</p> <ul style="list-style-type: none"> a) a site is suitable for its proposed use taking account of ground conditions and any risks arising from land instability and contamination. This includes risks arising from natural hazards or former activities such as mining, and any proposals for mitigation including land remediation (as well as potential impacts on the natural environment arising from that remediation); b) after remediation, as a minimum, land should not be capable of being determined as contaminated land under Part IIA of the Environmental Protection Act 1990; and c) adequate site investigation information, prepared by a competent person, is available to inform these assessments. 	
Light Pollution	185	<p>Planning policies and decisions should also ensure that new development is appropriate for its location taking into account the likely effects (including cumulative effects) of pollution on health, living conditions and the natural environment, as well as the potential</p>	<p>The Operational Lighting Framework, forming ES Appendix 5.2.2 (Doc Ref. 5.3), demonstrates that the Project is below the acceptable limits set out for</p>

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		<p>sensitivity of the site or the wider area to impacts that could arise from the development. In doing so they should:</p> <ul style="list-style-type: none"> a) mitigate and reduce to a minimum potential adverse impacts resulting from noise from new development – and avoid noise giving rise to significant adverse impacts on health and the quality of life⁶⁵; b) identify and protect tranquil areas which have remained relatively undisturbed by noise and are prized for their recreational and amenity value for this reason; and c) limit the impact of light pollution from artificial light on local amenity, intrinsically dark landscapes and nature conservation. 	<p>nuisance caused by lighting installation. Therefore, the Project is assessed as policy compliant in this regard.</p>
Community Engagement	40	<p>Local planning authorities have a key role to play in encouraging other parties to take maximum advantage of the pre-application stage. They cannot require that a developer engages with them before submitting a planning application, but they should encourage take-up of any pre-application services they offer. They should also, where they think this would be beneficial, encourage any applicants who are not already required to do so by law to engage with the local community and, where relevant, with statutory and non-statutory consultees, before submitting their applications.</p>	<p>Engagement on the Project has been carried out throughout the design process. This has included non-statutory and statutory consultation as described in Chapter 1 of the ES (Doc Ref. 5.1) and in Section 8.21 of the Planning Statement (Doc Ref. 7.1). The pre-application consultation undertaken is documented within the Consultation Report (Doc Ref. 6.1) submitted with the application. As a result, communities and planning decision-makers, including Local Authorities, have been able to give full consideration to the impacts of the Project and these matters are considered policy compliant.</p>
	126	<p>The creation of high quality, beautiful and 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.</p>	
	129	<p>Design guides and codes can be prepared at an area-wide, neighbourhood or site specific scale, and to carry weight in decision-making should be produced either as part of a plan or as supplementary</p>	

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		<p>planning documents. Landowners and developers may contribute to these exercises, but may also choose to prepare design codes in support of a planning application for sites they wish to develop. Whoever prepares them, all guides and codes should be based on effective community engagement and reflect local aspirations for the development of their area, taking into account the guidance contained in the National Design Guide and the National Model Design Code. These national documents should be used to guide decisions on applications in the absence of locally produced design guides or design codes.</p>	
	132	<p>Design quality should be considered throughout the evolution and assessment of individual proposals. Early discussion between applicants, the local planning authority and local community about the design and style of emerging schemes is important for clarifying expectations and reconciling local and commercial interests. Applicants should work closely with those affected by their proposals to evolve designs that take account of the views of the community. Applications that can demonstrate early, proactive and effective engagement with the community should be looked on more favourably than those that cannot.</p>	
	133	<p>Local planning authorities should ensure that they have access to, and make appropriate use of, tools and processes for assessing and improving the design of development. These include workshops to engage the local community, design advice and review arrangements, and assessment frameworks such as Building for a Healthy Life51. These are of most benefit if used as early as possible in the evolution of schemes, and are particularly important for significant projects such as large scale housing and mixed use developments. In assessing applications, local planning authorities should have regard to the outcome from these processes, including any recommendations made by design review panels.</p>	