OTTERPOOL PARK

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ENVIRONMENTAL STATEMENT

OP5 CHAPTER 2 **– EIA APPROACH AND METHODOLOGY**

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APPLICATION CONTENTS

2 EIA Approach and Methodology

2.1 Legislation, Policy and Guidance

2.1.1 The ES been prepared in accordance with the Town and Country Planning (Environmental Impact Assessment) Regulations 2017 as amended (the 'EIA Regulations')(Ref. 1.1). Reference has also been made to relevant good practice guidance relating to EIA process including:

- Impact Assessment Guidelines and ES Review Criteria (Institute of Environmental Management and Assessment (IEMA), 2004) (Ref. 2.1);
- National Planning Policy Framework (NPPF) Planning Practice Guidance on Environmental Impact Assessment, 2021) (Ref. 2.2);
- Guidelines for Environmental Impact Assessment (IEMA / RPS, 2004) (Ref. 2.3);
- Guide on Environmental Statements for Planning Projects that Require Environmental Assessment (Department of Environment, 1995) (Ref. 2.4); and
- The State of Environmental Impact Assessment Practice in the UK (IEAM 2011) (Ref. 2.5).
- IEMA Environmental Impact Assessment Guide to Delivering Quality Development (July 2016) (Ref. 2.6)

2.1.2 Other specific guidance, as relevant to each chapter of this ES, is referred to as appropriate in the relevant chapter.

2.1.3 The requirements with regard to the content of an ES are set out in Regulations 18(3) of and Schedule 4 of the EIA Regulations (Ref. 1.1). Table 2-1 summarises these requirements and where the relevant information required is located within this ES.

Table 2-1 Location of required information within this ES

Summary of requirements of Regulation 18(3) and Schedule 4	Location of information in this ES
18(3)a) A description of the proposed development comprising information on the site, design, size and other relevant features of the development.	Chapter 4: The Site and the Proposed Development
18(3)b) A description of the likely significant effects of the proposed development on the environment.	'Assessment of Residual and Cumulative Effects' in Chapters 5-17 of this ES.
18(3)c) A description of any features of the proposed development, or measures envisaged in order to avoid, prevent or reduce and, if possible, offset likely significant adverse effects on the environment.	'Design and Mitigation' in Chapters 5 to 17 of this ES.
d) A description of the reasonable alternatives studied by the developer, which are relevant to the proposed development and its specific characteristics, and an indication of the main reasons for the option chosen, taking into account the effects of the development on the environment.	Chapter 3: Development Need and Consideration of Alternatives
18(3)e) A non-technical summary.	Volume 1 of the ES
18(3)f) Any additional information specified in Schedule 4 relevant to the specific characteristics of the particular development or type of	Technical assessments in Chapters 5-17 of this ES.

Summary of requirements of Regulation 18(3) and Schedule 4	Location of information in this ES
development and to the environmental features likely to be significantly affected.	
1. A description of the development, including in particular: (a)a description of the location of the development; (b)a description of the physical characteristics of the whole development, including, where relevant, requisite demolition works, and the land-use requirements during the construction and operational phases; (c)a description of the main characteristics of the operational phase of the development (in particular any production process), for instance, energy demand and energy used, nature and quantity of the materials and natural resources (including water, land, soil and biodiversity) used; (d)an estimate, by type and quantity, of expected residues and emissions (such as water, air, soil and subsoil pollution, noise, vibration, light, heat, radiation and quantities and types of waste produced during the construction and operation phases.	Chapter 4: The site and proposed Development
2. A description of the reasonable alternatives (for example in terms of development design, technology, location, size and scale) studied by the developer, which are relevant to the proposed project and its specific characteristics, and an indication of the main reasons for selecting the chosen option, including a comparison of the environmental effects.	Chapter 3: Development Need and Consideration of Alternatives
3. A description of the relevant aspects of the current state of the environment (baseline scenario) and an outline of the likely evolution thereof without implementation of the development as far as natural changes from the baseline scenario can be assessed with reasonable effort on the basis of the availability of environmental information and scientific knowledge.	'Baseline' section in Chapters 5-17 of this ES
4. A description of the factors specified in regulation 4(2) likely to be significantly affected by the development: population, human health, biodiversity (for example fauna and flora), land (for example land take), soil (for example organic matter, erosion, compaction, sealing), water (for example hydromorphological changes, quantity and quality), air, climate (for example greenhouse gas emissions, impacts relevant to adaptation), material assets, cultural heritage, including architectural and archaeological aspects, and landscape.	'Baseline' section in Chapters 5-17 of this ES
5. A description of the likely significant effects of the development on the environment resulting from, inter alia: (a)the construction and existence of the development, including, where relevant, demolition works; (b)the use of natural resources, in particular land, soil, water and biodiversity, considering as far as possible the sustainable availability of these resources; (c)the emission of pollutants, noise, vibration, light, heat and radiation, the creation of nuisances, and the disposal and recovery of waste; (d)the risks to human health, cultural heritage or the environment (for example due to accidents or disasters);	'Assessment of Residual and Cumulative Effects' in Chapters 5-17 of this ES.

Summary of requirements of Regulation 18(3) and Schedule 4	Location of information in this ES
(e)the cumulation of effects with other existing and/or approved projects, taking into account any existing environmental problems relating to areas of particular environmental importance likely to be affected or the use of natural resources; (f)the impact of the project on climate (for example the nature and magnitude of greenhouse gas emissions) and the vulnerability of the project to climate change; (g)the technologies and the substances used. The description of the likely significant effects on the factors specified in regulation 4(2) should cover the direct effects and any indirect, secondary, cumulative, transboundary, short-term, medium-term and long-term, permanent and temporary, positive and negative effects of the development. This description should take into account the environmental protection objectives established at Union or Member State level which are relevant to the project, including in particular those established under Council Directive 92/43/EEC(**1**) and Directive 2009/147/EC(**2**).	
6. A description of the forecasting methods or evidence, used to identify and assess the significant effects on the environment, including details of difficulties (for example technical deficiencies or lack of knowledge) encountered compiling the required information and the main uncertainties involved.	'Assessment Methodology' section in Chapters 5-17 of this ES
7. A description of the measures envisaged to avoid, prevent, reduce or, if possible, offset any identified significant adverse effects on the environment and, where appropriate, of any proposed monitoring arrangements (for example the preparation of a post-project analysis). That description should explain the extent, to which significant adverse effects on the environment are avoided, prevented, reduced or offset, and should cover both the construction and operational phases.	'Design and Mitigation' section in Chapters 5-17 of this ES
8. A description of the expected significant adverse effects of the development on the environment deriving from the vulnerability of the development to risks of major accidents and/or disasters which are relevant to the project concerned. Relevant information available and obtained through risk assessments pursuant to EU legislation such as Directive 2012/18/EU(3) of the European Parliament and of the Council or Council Directive 2009/71/Euratom(4) or UK environmental assessments may be used for this purpose provided that the requirements of this Directive are met. Where appropriate, this description should include measures envisaged to prevent or mitigate the significant adverse effects of such events on the environment and details of the preparedness for and proposed response to such emergencies.	Chapter 2: EIA Approach and Methodology (scoped out)
9. A non-technical summary of the information provided under paragraphs 1 to 8.	ES Volume 1
10. A reference list detailing the sources used for the descriptions and assessments included in the environmental statement.	'Reference' section of chapters 1-17 of this ES.

2.2 Outline of EIA Process

2.2.1 EIA is an iterative process. In this ES, the EIA process has been undertaken according to the stages discussed further below.

2.2.2 The aims of EIA are:

- To gather information on the existing environment and identify environmental constraints and opportunities associated with development of the area which may be affected by the proposed Development;
- To identify 'reasonable' alternatives to the Development in terms of site location or alternative designs in one location;
- To identify and assess potentially significant environmental effects (adverse or beneficial) that may arise from the construction and operation of the proposed Development;
- To outline measures and/or design criteria that may be required to mitigate significant adverse effects where necessary; and
- To assess the residual effects of the proposed Development following the implementation of appropriate mitigation measures.

2.2.3 EIA is an iterative process, the aim of which is to identify and minimise where possible the likely significant environmental effects of the proposed Development. In general terms, the main stages of the EIA process are identified below:

- Screening, to determine the need for EIA. Given the scale of the proposed Development has the potential for likely significant effects, this stage was not considered necessary and the project proceeded to Scoping.
- Scoping, to determine the scope of the Environmental Statement (ES) and identify potentially significant effects, both positive and negative;
- Consultation, to seek feedback from consultees and the public in relation to key environmental issues, the methodology adopted, and design approaches;
- Data review, site visits and surveys to establish the existing baseline conditions;
- Assessment and design iteration. This stage comprises assessment of the likely significant effects of the proposed Development (during the construction and operation phases), incorporating feedback to allow modification of the development where possible, and identification of mitigation/enhancement measures to prevent, reduce and, where possible, offset any significant adverse effects on the environment;
- Assessment of the final design of the development, identification of additional mitigation/enhancement requirements where appropriate/possible and consideration of likely residual effects;
- Preparation of the ES and submission of the application for planning permission to the decision maker;
- Publicity of and consultation on the planning application and the ES by the decision maker with statutory and other consultees and members of the public;
- Consideration, by the decision maker, of the application and environmental information comprising the ES, the responses from statutory consultees and representations from interested parties;
- Decision to refuse or grant permission; and
- If permission is granted, implementation in accordance with planning conditions.

2.3 Scoping and Consultation

2.3.1 Consultation focusing on environmental matters commenced during the initial baseline data gathering and scoping stages of the EIA was undertaken for the 2019 planning application (the '2019 EIA') and has continued throughout the course of this EIA process, as detailed within the individual technical chapters of this ES. Both statutory and non-statutory stakeholders have been consulted.

2.3.2 A Scoping Opinion was sought from F&HDC following the submission of the previous outline planning application and ES in February 2019 and subsequent consultee comments were received regarding the scheme design that was assessed at the time. Following the design changes after submission of the 2019 EIA (to respond to consultee comments) a Scoping Report was submitted to F&HDC in June 2020 (see ES Appendix 2.1). The June 2020 Scoping Report set out the proposed scope of this ES in terms of environmental topics, methodology and assessment approach, and taking into account the amended Otterpool Park proposals and previous consultee comments made during consultation on the 2019 ES. Consultees requested to inform the scoping opinion included those cited below. The scope of each of the topic assessments is described in the Assessment Methodology subsections of Chapters 5-17 of this ES.

2.3.3 F&HDC provided a Scoping Opinion in July 2020 which is included at ES Appendix 2.2 The Scoping Opinion agreed that the following environmental topics should be scoped into the EIA:

- Agriculture and soils;
- Air Quality;
- Biodiversity;
- Climate Change;
- Cultural Heritage;
- Geology, Hydrogeology and Land Quality;
- Human Health;
- Landscape and Visual;
- Noise and Vibration;
- Socio-Economic Effects and Community;
- Surface Water Resources and Flood Risk;
- Transport; and

  Waste and Resource Management.

2.3.4 Cumulative effects (inter-project and intra-project) have been considered and are reported in the topic assessment chapters.

2.3.5 It was also agreed that the following topics could be scoped out of the EIA:

- Major Accidents and Disasters (MAD)

2.3.6 The justification for excluding a stand-alone MAD assessment chapter for the ES was provided in the section 4.9 of the 2020 Scoping report (ES Appendix 2.1) submitted with the Scoping Opinion request to F&HDC. It was agreed by F&HDC in its formal Scoping Opinion (ES Appendix 2.2) that a separate MAD assessment was not required.

2.3.7 Consultation has also been undertaken throughout the design process with relevant statutory and non-statutory stakeholders. This has addressed a number

of matters including the scope and appropriate methodologies to adopt for the topic assessments listed above. This consultation process also informed the 2020 Scoping Opinion received from F&HDC (ES Appendix 2.2). Specific assessment requirements from consultees, as set out in the July 2020 Scoping Opinion, are addressed in the relevant topic assessment chapters of this ES.

2.3.8 The appropriate bodies, including key consultees F&HDC, the Kent Downs Area of Outstanding Natural Beauty (AONB) Unit, Kent County Council, Natural England, Historic England, the Environment Agency and National Highways, have been consulted in order to obtain views on the proposed Development design, discuss mitigation and to obtain information relating to constraints and opportunities as appropriate. Details of other consultation are tabulated in each of the relevant topic specific ES chapters (see relevant 'Scoping and Consultation' headings in each respective ES chapter).

EIA Scoping Report Addendum 2021

2.3.9 Since the Scoping Report was prepared and the July 2020 Scoping Opinion was received, a number of changes to the proposed Development have been made that have also led to refinements to the application site boundary. A Scoping Report Addendum was submitted to F&HDC outlining these changes on 5 October 2021 and is included in ES Appendix 2.3. The scheme changes that informed the application site boundary changes include the following:

- The relocation of the previously proposed Waste Water Treatment Works (WWTW) to land that is directly north-west and outside of the former 2019 ES application site boundary to reflect a desire to keep the new plant as distant from the nearby landowner's property as possible;
- An extension of the area required for highways works at Newingreen Junction; and
- A change in the assessment approach proposed following consultation with Kent County Council (KCC) and Historic England (HE) in relation to the future uses of Westenhanger Castle (see Section 2.2 for further details).

2.3.10 In addition, the construction duration of the proposed Development has been shortened since submission of the Scoping Report from 25 years to 19 years. The 19 year construction duration has been assessed within this ES.

Changes since the 2021 Scoping Report Addendum

2.3.11 A further change in the application site boundary has been identified since submission of the 2021 Scoping Report, comprising the removal of approximately 2ha of land in the north east corner of the site. This land has been removed from the application site boundary due to uncertainty on the ability to procure this parcel.

2.3.12 Additionally, an all movement corridor (the additional link road) will be provided between development area TC.2 and HF.2 in the north-east of the site. Formerly the route was solely for bus, cycleway and emergency vehicles.

Review of the 2019 ES, 2020 Scoping report, 2021 Scoping addendum and 2021 Draft ES

2.3.13 Temple was commissioned by F&HDC to:

- Review the ES during consultation on the 2019 ES submission. A number of matters were raised on the ES in an Interim Review Report;
- Review the 2020 Scoping Report (ES Appendix 2.1) for feedback to be incorporated into the LPA's formal scoping opinion (ES Appendix 2.2); and

- Review the 2021 Draft ES.

2.3.14 F&HDC also provided a response on the Scoping Report Addendum 2021, provided in ES Appendix 2.3.

2.3.15 ES Appendix 2.4 provides an explanation of how the overarching/general comments raised in the above reviews have been responded to within this ES. Topic specific comments have been responded to within the relevant topic chapter of this ES.

Outline Planning Application and the 'Three-Tier Approach'

2.3.16 Following consultation on the ES submitted as part of the 2019 planning application (the '2019 ES'), a 'three-tier' approach has been proposed for the planning application. The conditions that would be attached to the OPA, if granted, would require two further consents stages to control the design and delivery of the proposed Development from outline to the reserved matters stage.

2.3.17 Development quantum threshold 'triggers' will be agreed through the S106 legal agreement, the triggers will inform the need to provide certain key infrastructure in advance of development land parcels coming forward. These triggers will be established in order to demonstrate how the proposed Development can be constructed without the need for fixed phasing of the development land parcels at the outline application stage.

2.3.18 Tier 3 reserved matters applications can come forward outside of the tiered approval process to accommodate critical or enabling infrastructure (for example, a reserved matters application for the waste water treatment plant in the north west of the site or for enabling highway infrastructure to facilitate further development).

2.3.19 The 'three-tier' system includes the following key stages of the planning process:

- **Tier 1 (Outline planning application):** The amended OPA would secure approval for the proposed Development through a Development Specification document (ES Appendix 4.1), accompanying Parameter Plans (ES Appendix 4.2), and Strategic Design Principles (ES Appendix 4.3) which form the basis of the EIA.

  The EIA will consider the flexibility presented by the Parameter Plans (ES Appendix 4.2) in respect of the completed development, in line with approach of assessing the "Rochdale envelope". This will address the worst case for the proposed Development in operation. Given the considerable length of time within which the proposed Development will be carried out (i.e. circa 19 years), uncertainties exist in terms of the sequencing of construction to meet local demand. Given the numerous ways in which the proposed Development could be sequenced, it is not possible to assess the intermediate effects and it is therefore not proposed to assess specific sequencing of the Indicative Development Phase areas. There is, however, an assessment of the construction peak period (2030), based on annual housing numbers and associated infrastructure (e.g. schools and education facilities) delivery requirements.

  A key exception to the 'Rochdale envelope' approach with respect to EIA, regarding the approach to Westenhanger Castle, is set out in the Assessment section in Section 2.5.

- There are site-wide strategies and Strategic Design Principles (ES Appendix 4.3) documents to supplement the parameters for the proposed Development and these will inform mitigation. The strategies carried out site wide are in

relation to delivery management, surface water and drainage, housing, energy, heritage, economic, utilities delivery, community facilities, governance and stewardship, green infrastructure and waste. Mitigation and strategies put forward at this stage would be developed further for Tier 2. The ES is being produced at this stage (Tier 1) for the amended OPA, with recommendations for embedded design measures to be considered at the Tier 2 and Tier 3. This ES has sufficient detail at Tier 1 to allow an assessment of the likely significant environmental effects, so that F&HDC as LPA can accept the principle of the proposed Development.

- **Tier 2 (Detailed masterplan for each phase):** This Tier will include the submission of a phase-specific masterplan, design code and delivery plan. This documentation will set the definition of and provide a framework for each of the development phases. It will inform and establish a base against which reserved matters applications will be submitted for approval. Tier 2 applications will need to be in accordance with the principles agreed as part of Tier 1 outline planning application permission to ensure that the proposed Development substantially accords with the Parameter Plans (ES Appendix 4.2), Development Specification (ES Appendix 4.1) and Strategic Design Principles (ES Appendix 4.3). The design will need to be in substantial accordance with the assessment outcomes and mitigation requirements within this ES, that is within the worst-case parameters and assumptions used for the respective assessments.
- **Tier 3 (Reserved matter applications):** Following Tier 1 and relevant Tier 2 approvals, reserved matters applications will seek approval for individual parcels or infrastructure. These reserved matters applications will provide detailed design in accordance with the framework for that area secured in Tier 1. Additional mitigation measures will be embedded in the design of the proposed Development to minimise the identified potential impacts on specific receptors. The design will need to be in substantial accordance with the assessment outcomes within this ES by being within the worst-case parameters and assumptions used for this assessment.

2.3.20 It should be noted that, should Tier 2 (detailed masterplans) or Tier 3 (reserved matters applications) include material variations to elements presented in the outline application, for example, different environmental mitigation (albeit still in accordance with the parameters set out in the outline planning application or any amendments subsequently approved), this will be submitted with as an addendum to the ES as appropriate.

2.3.21 However, if the above variations were not considered material and did not alter the conclusions of the EIA in terms of significant effects and their mitigation, then these changes would be addressed through a formal EIA Screening request or ES Statement of Conformity to F&HDC, to gain approval that the ES would not need to be updated.

2.3.22 Regardless of EIA Screening, reserved matters applications would be supported by any necessary further environmental assessments required to define mitigation measures in detail that would not have been achievable at Tier 1, for example additional archaeological evaluation.

2.4 Assessment Methodology

Spatial Scope

2.4.1 The geographical extent of the EIA is referred to as the 'spatial scope'. The spatial scope of the assessment will vary depending on the type of environmental receptor. Also, the area over which impacts could occur can often be wider than the area of land directly taken by the proposed Development.

2.4.2 The study area for the proposed Development has been individually defined for each technical assessment based on the spatial scope of the potential impacts on receptors/resources and the relevant topic specific criteria. The study areas for each technical assessment are further described within the relevant chapters of this ES (Chapters 5 - 17).

2.4.3 The surveys and supporting assessments appended to this ES have been completed throughout the lifecycle of the proposed Development. Therefore, certain appendices may contain a slightly different application site boundary. This ES, however, has assessed the application site boundary shown in Figure 1.1 (in ES Appendix 1.1).

2.4.4 The study areas allow for the assessment of indirect as well as direct effects where appropriate.

2.4.5 The proposed Development requires an element of infrastructure works to be undertaken outside the application site boundary, as shown on Figure 1 of ES Appendix 4.7. These elements are not assessed within the main body of the ES, however, ES Appendix 4.7 presents the assessment of off-site infrastructure.

Temporal Scope

2.4.6 The temporal scope of the assessment is aligned with the timing of the construction and operational phases of the proposed Development. The assessment has been conducted for specific years in line with the likely build out plan, as appropriate for each technical assessment.

2.4.7 Given its nature, the proposed Development is expected to have a design life of at least 100 years and would be maintained and upgraded as required. Therefore, the EIA does not cover the decommissioning of the proposed Development. In addition, the likely impact of any maintenance and upgrade works would be no worse than those discussed for the construction phase of the proposed Development.

2.4.8 It is recognised that some effects would be long term, or permanent, in nature, whereas others would be temporary, or short-term. For instance, construction phase effects are typically considered to be temporary in nature whereas operational phase effects are more likely to be permanent and long-term. Construction activities would not be constant through the entire construction period, only occurring in discrete areas and for discrete periods following successful reserved matters planning applications for specific land parcels.

2.5 Assessment Scenarios

2.5.1 The scenarios against which the significant likely environmental effects have been assessed are as follows:

Baseline Conditions

2.5.2 The baseline refers to conditions as they are today (i.e. the existing site). In order to assess the environmental impacts on receptors that would be caused by the proposed Development, and to identify any potential significant effects, a

comparison of the current environmental conditions immediately before the proposed Development is implemented (baseline) and then a prediction of how the environmental conditions are likely to change in the absence of the Development (future baseline), is needed.

2.5.3 Where other developments are expected to be completed before the construction of the proposed Development commences, these developments are considered as part of the future baseline scenario in the technical assessments as appropriate. The status of these developments has been determined from a review of planning applications in F&HDC and Ashford Borough Council (see ES Appendix 2.5) Other developments which are expected to be under construction during the construction period of the proposed Development have been considered as part of the cumulative assessment outlined below (see 'Inter-project Cumulative Effects' section). The approach to cumulative assessment has been agreed with the Local Planning Authority as part of the Scoping process, and is set out in the 'Cumulative Effects' section below.

2.5.4 A range of baseline data has been gathered to define the local environmental conditions for the purpose of the assessment, including:

- Published documentary information from a variety of sources including historical and contemporary records;
- Site survey information, including background noise levels, background pollutant concentration levels, biodiversity features, landscape character; baseline traffic levels on the road and rail networks, community facilities and heritage assets;
- Other survey information including, aerial photography, geo-environmental and socio-economic data; and
- Data provided by key statutory and non-statutory stakeholders.

2.5.5 A description of the site and surrounding environment is given in Chapter 4: The Site and the proposed Development. More detailed topic-specific baseline information is included in Chapters 5-17, appropriate to describe the likely significant adverse or beneficial environmental effects arising from the proposed Development.

2.5.6 The baseline data for each topic assessment comprises the most recently available relevant data and is considered robust.

2.5.7 The future baseline is addressed in each ES chapter with respect to the likely impacts generated by the proposed Development in combination with other cumulative schemes that would be in operation in future.

Construction Phase Assessment

2.5.8 The proposed Development is expected to be constructed between 2023 and 2042. The term 'construction phase' as used in this report also includes the demolition and enabling works which will be required to facilitate the project.

2.5.9 The peak construction period for construction activity is anticipated to be around 2030 based on the estimated housing construction numbers and the likely delivery of a secondary school and additional primary school at this stage of the development together with other community facilities and the ongoing provision of supporting infrastructure. It is also inclusive of enabling works on the plots (delivery of plant, materials, waste and compound set up etc.) and reflects the most construction activity over the period. The construction peak year assumes partial occupation of the site so that the new receptors have been accounted for.

This assessment year has been assessed in terms of transport, noise, air quality and climate effects to determine the worst-case effects.

2.5.10 Impacts during the construction phase on any future on-site occupants or users of parts of the site while construction is still ongoing have been considered where appropriate as part of the construction phase assessments in the technical chapters.

2.5.11 There are no defined spatial or temporal phases for construction of the proposed Development. The assessment within this ES has largely assessed an assumed worst-case on this basis, and the following Tiers of approval will confirm that the proposed Development is compliant with these worst-case assumptions. However, certain topics of the ES (largely transport, and transport derived impacts such as air quality, noise and climate) required further detail to complete an assessment of construction impacts, in these cases assumptions have been made on the basis of the Illustrative Accommodation Schedule (ES Appendix 4.4) and the phasing used within this. Further information on this methodology is provided in Chapter 16: Transport.

Operational Assessment

2.5.12 The proposed Development is assumed to be operationally fully complete by 2042 with the Framework Masterplan (to deliver 10,000 homes if approved) completion estimated at 2044. Given the relatively long period between the existing baseline conditions identified in this ES and the assumed year of completion, consideration has been given as to how the baseline conditions may change during that period.

2.5.13 It should be noted that the proposed mixed used Development of 8,500 homes is referred to a ‘garden settlement’. The Framework Masterplan which includes up to 10,000 homes and an additional school, is referred to as the ‘garden town’.

2.5.14 First occupation of the proposed development will be in 2024 and has been assessed as appropriate to relevant chapters (e.g. Air Quality).

Sensitivity Testing

2.5.15 The transport modelling has been prepared based on the Illustrative Accommodation Schedule (ES Appendix 4.4) and Illustrative Masterplan (ES Appendix 4.5). The quantum of development set out within the Illustrative Accommodation Schedule is lower than that for which approval is requested within the Development Specification (and Chapter 4: The Site and Proposed Development). Table 2-2 illustrates the difference in floorspace quantum both for the proposed Development, and the proposed Development plus Framework Masterplan scenario.

Table 2-2 Comparison between the Illustrative Accommodation Schedule and Development Specification Quantum

Land Use	Illustrative Accommodation Schedule (sqm gross external area GEA)	Development Specification (sqm GEA – maximum parameters)	Illustrative Accommodation Schedule + Framework Masterplan (sqm GEA)	Likely maximum floorspaces for the Framework Masterplan (sqm GEA)*
Residential	8,500 units	8,500 units	10,000 units	10,000 units
Education and Community Facilities	65,728	67,000	69,537	69,537
Hotel	7,700	8,000	7,700	8,000
Leisure	7,425	8,500	7,425	8,500
Mixed retail and related uses	28,875	29,000	28,875	29,000
Employment	79,900	87,500	79,900	87,500
Total (non-residential land use)	186,550	200,000	186,550	200,000

*Note that the Framework Masterplan scenario (10,000 homes) is not being submitted for approval, hence, these values are considered to represent a likely scenario for the purposes of this assessment

2.5.16 There is a necessity within the transport model to use the Illustrative Accommodation Schedule and Illustrative Masterplan due to the requirement to identify the location of trip start and end points. Sensitivity test scenarios have however been undertaken by the transport topic and transport related topics (Chapter 16: Transport, Chapter 6: Air Quality, Chapter 8: Climate and Chapter 13: Noise and Vibration) to ensure that the transport and transport related assessments are valid for the full quantum of development for which approval is requested.

2.5.17 In addition, the sensitivity test accounts for the connection of a road in the proposed town centre (the additional link road). The base transport model did not include for the route to be connected for through traffic (as shown on Figure 2-1), however, the sensitivity test does allow for this connection as shown on Figure 2-2 and within the Development Area and Movement Corridor Parameter Plan (ES Appendix 4.2).

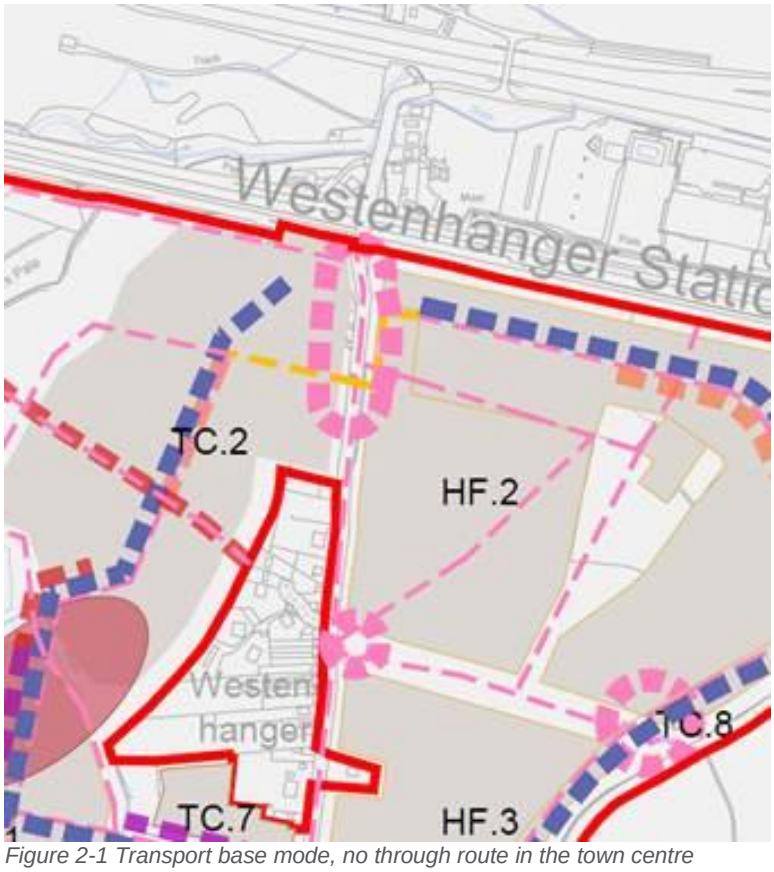

Figure 2-1 Transport base mode, no through route in the town centre

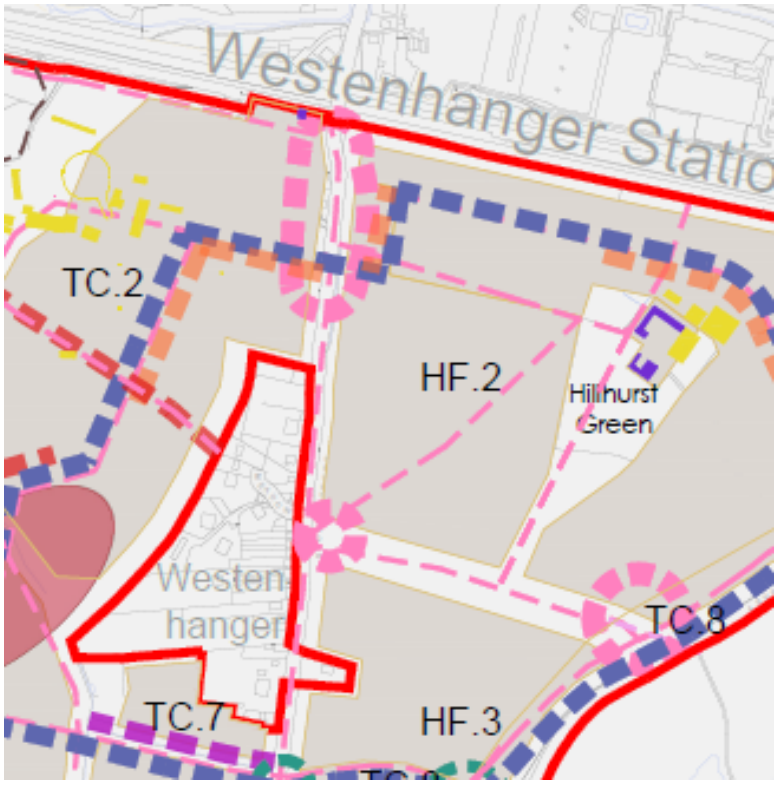

Figure 2-2 Sensitivity testing scenario, through route in the town centre

2.5.18 The sensitivity test scenarios comprise:

- **Scenario 1: Quantum for approval 2044** - This scenario accounts for the proposed Development quantum as set out in the Development Specification (ES Appendix 4.1) and assumes that build out will be completed in 2044. The Site and the Proposed Development (Chapter 4) identifies that the build out of 8,500 homes will be completed in 2042. However, 2044 has been used in this assessment because the 2044 assessment year represents a worst-case scenario in terms of a combination of 8,500 homes and background traffic growth. This assessment year for 8,500 homes has also been used in Chapter 16: Transport.
- **Scenario 2: Quantum for approval 2044 + Framework Masterplan** - This scenario accounts for the proposed Development quantum as set out in the Development Specification plus the anticipated Framework Masterplan area quantum as shown in the Illustrative Accommodation Schedule (10,000 homes and an additional school, although noting that the Developments Specification quantum is higher for all uses apart from residential and education/community). It assumes build out will be completed in 2044. This assessment scenario has been used in Chapter 6: Air Quality, Chapter 8: Climate Change and Chapter 13: Noise and Vibration.
- **Scenario 3: Quantum for approval 2030 + Framework Masterplan** - This scenario accounts for the proposed Development quantum as set out in the Development Specification plus the anticipated Framework Masterplan area quantum as shown in the Illustrative Accommodation Schedule at the construction peak, which is 2030 (10,000 homes and an additional school, although noting that the Developments Specification quantum is higher for all uses apart from residential and education/community). This assessment scenario has been used in Chapter 6: Air Quality, Chapter 8: Climate Change and Chapter 13: Noise and Vibration.

2.5.19 Further information on the outcomes of the sensitivity test are contained within the respective chapters.

Assessment of Parameters for the Outline Planning Application

2.5.20 Regulation 3 of the EIA Regulations (Ref. 1.1) prohibits local planning authorities from granting planning permission for 'EIA Development' unless an EIA has been carried out in respect of that development. The Local Planning authority must take into account the information in the ES, the responses to consultation and any other relevant information when determining a planning application for EIA Development.

2.5.21 Where a consent procedure involves more than one stage (termed a 'multi-stage consent'), for example, a first stage involving a principal decision (such as an outline planning permission) and the other an implementing decision (such as at reserved matters), the likely significant effects of a project on the environment should so, far as possible, be identified and assessed at the time of the procedure relating to the principal decision.

2.5.22 However, if those effects are not identified or identifiable at the time of the principal decision, an assessment must be undertaken at the subsequent consenting stage. In this case that would be at the Tier 2 and 3 stages, and prior to approval of reserved matters following grant of the outline planning permission.

The approval of reserved matters to be submitted at the Tier 3 stage will be secured by way of planning condition.

2.5.23 To minimise the possibility that further environmental information is required at a later stage of a multi-stage consent procedure, it is considered that:

- where an application is made for an outline permission with all matters reserved for later approval, the permission should be subject to conditions or other parameters which 'tie' the scheme to what has been assessed; and
- while applicants are not precluded from having a degree of flexibility in how a scheme may be developed, each option will need to have been properly assessed and be within the remit of the outline permission.

2.5.24 Consequently, where an EIA is required for an outline planning application, the description of the proposed Development contained within the ES must be sufficient to enable the requirements of the EIA Regulations (Ref. 1.1) to be fulfilled, and in particular, to enable the likely significant effects of the proposed Development to be identified. To provide sufficient information to allow this to occur, whilst providing the Applicant with sufficient flexibility for future reserved matters applications, a series of 'parameters' have been defined for the proposed Development.

2.5.25 Planning conditions and s106 planning obligations (as appropriate) will be used as a mechanism to ensure that the requirements of the EIA Regulations (Ref. 1.1) are met by ensuring that any planning permission granted is consistent with the description of the proposed Development that has been assessed. These conditions and obligations will require that the details of the proposed Development, which will be subject to Tier 2 (Indicative Phase submissions) and Tier 3 (reserved matters applications), must fall within the parameters laid down by the outline planning permission and on which the EIA has been based. This is to ensure that the proposed Development does not take place in a form which would lead to significantly different environmental effects from those considered in this ES.

The 'Rochdale Envelope' Approach to Assessment

2.5.26 The 'Rochdale Envelope' approach to assessment has been undertaken with respect to the EIA. This has been undertaken in light of the outline nature of the planning application and the flexibility afforded by the three tier approach to gaining consents for the Development. Parameter Plans (as described further below) delineate the maximum geographical extents of different features of the proposed land uses and quantum of development that is permissible and have been used to assess significant environmental effects as they relate to the topic being assessed. The Parameter Plans define the maximum lateral extent of built development, minimum open space requirements and vegetation retention, primary and secondary access routes for roads, footpaths and bridleways (with lateral limits of deviation), and maximum building heights.

2.5.27 The Development Specification (ES Appendix 4.1) and parameter plans (ES Appendix 4.2) for the outline components of the proposed Development have been identified and tested through the EIA, and comprise:

- Development Areas and Movement Corridors (OPM(P)4001-revYY);
- Open Space and Vegetation (OPM(P)4001_revYY); and
- Heights (OPM(P)4001_revYY).

2.5.28 A Strategic Design Principles (ES Appendix 4.3) document also supports the above documents for the Tier 1 stage and will inform the Design Codes required for submissions at Tier 2. Together, the Development Specification, Parameter

Plans and Strategic Design Principles comprise the documents for approval in the OPA.

2.5.29 An Illustrative Masterplan (ES Appendix 4.5) has also been submitted as part of the supporting information to the planning application. This provides further information about the proposed Development and is intended to illustrate how the proposed Development could be built out within the assessed parameters.

2.5.30 The assessment of likely significant environmental effects set out in this ES has therefore had regard to, and been informed by, the following matters:

- An amended OPA for the site, for which Parameter Plans (ES Appendix 4.2), a Development Specification (ES Appendix 4.1), Strategic Design Principles (ES Appendix 4.3) and strategies mentioned in Section 2.2 are submitted to F&HDC for planning approval; and
- Supporting information provided in other documents submitted with the amended application.

2.5.31 The proposed Development as presented in the documents for approval has formed the basis of assessments for this EIA.

2.5.32 Where exact details are not known at the outline stage (for example the breakdown of residential unit types or the construction methodologies), assumptions have been made for assessment purposes, based on reasonably foreseeable circumstances.

2.5.33 The key exception to the above 'Rochdale envelope' approach to the EIA is reflected in the Scoping Addendum request with respect to the Westenhanger Castle area and the future community and commercial uses. As reported in the Scoping Addendum, the form, siting and detail of future uses and development in close proximity of the Castle are the subject of continued engagement with HE, KCC and other stakeholders. There are therefore no parameters for scale, form, layout and access to assess with respect to the Rochdale envelope approach to parameters (specific to the castle).

2.5.34 No new built development is proposed within the Westenhanger Castle indicative phase at this stage however through the OPA the existing buildings can be used as set out in Chapter 4: The Site and Proposed Development. The Applicant commits to use best endeavours to submit for approval a full planning application for the future uses (likely to include use classes E – Commercial, Business and Service and F – Local Community and Learning) and built development to come forward at the castle and its immediate grounds (for the area shown as the indicative castle development phase on the Development Areas and Movement Corridors Parameter Plan, ES Appendix 4.2). The proposed application will be prepared in line with the principles in the Heritage Strategy (ES Appendix 4.12) and Conservation Management Plan (ES Appendix 9.25), in order to secure the future viable use of the castle. It is anticipated that this commitment will be secured through legal agreement. An ES Addendum will be submitted if appropriate when the future proposals for the castle are submitted for approval.

Significance Criteria

2.5.35 Generally, significance of effect is determined through combining the value (or sensitivity) of a resource or receptor with the magnitude of the predicted change (or impact). The criteria for determining significance varies across topics, but in general takes into account some or all of the following:

- The existence of the development;
- Extent, magnitude and reversibility of the effect;

- Duration of the effect (whether short, medium or long-term);
- Permanence of the effect (temporary or permanent);
- Nature of the effect (whether direct or indirect, reversible or interactive);
- Likelihood of effect occurring;
- Whether the effect occurs in isolation, is cumulative or interactive;
- Performance against environmental quality standards or other relevant pollution control thresholds; and
- Sensitivity of the receptor.

2.5.36 Some professional institutions have published guidance or bespoke methodologies for assessing the likely significance of effects. Where such topic-specific methodologies are available, they have been applied in this ES to derive significance of effects. These methodologies are outlined in the topic-specific chapters.

2.5.37 There are, however, some topics where no standard methodology has been established for determining the significance of effects. Where this is applicable, the advice on typical descriptors of environmental value, magnitude of impact and significance of effects set out in the table below has been used as the appropriate basis for assessment, along with professional judgement.

2.5.38 Table 3-3 presents an assessment matrix which, where appropriate, has informed the assessment of significance of effects (if appropriate for the topic under consideration). The nature of effects may be described as either adverse or beneficial. A combined assessment of sensitivity and magnitude is undertaken to assist in identifying how significant an effect is likely to be. Where effects are identified as likely to be significant they have been shaded.

Table 3-3 General Approach for Determining Significance

	Sensitivity of Receptor			
Impact Magnitude		High	Medium	Low
	High	Major adverse/ beneficial	Major adverse/ beneficial	Moderate adverse/ beneficial
	Medium	Moderate adverse/ beneficial	Moderate adverse/ beneficial	Minor adverse/ beneficial
	Low	Moderate adverse/ beneficial	Minor adverse/ beneficial	Negligible
	Negligible/ Neutral	Minor adverse/ beneficial	Negligible	Negligible

2.5.39 However, the methodologies described within each topic chapter do not always use the same terminology and the matrix above has been adapted where appropriate on a topic-by-topic basis.

2.5.40 Nevertheless, in general, the principle is that higher magnitude effects on important resources are regarded as likely to be ‘Significant’ with respect to the EIA Regulations (Ref. 1.1). Lower magnitude effects on less important or

sensitive resources are generally regarded as not likely to be significant with respect to the EIA Regulations (Ref. 1.1). The Assessment of Residual Effects section of each topic chapter clearly identifies those effects considered likely to be Significant with respect to the EIA Regulations (Ref. 1.1).

2.5.41 When determining the likely significance of effects, the following definition of 'impact' and 'effect' has been used:

- Impact: the change arising from the proposed Development. The extent of change anticipated as a result of the proposed Development is identified by the 'magnitude of change/impact'; and
- Effect: the consequence of the impact (or change) arising from the proposed Development. The likely significance of effect is a combination of the value / sensitivity of a receptor and the likely magnitude of change/impact upon it.

Mitigation Measures

2.5.42 Identifying appropriate mitigation for a development is an iterative process of seeking to reduce potential likely significant environmental effects via a hierarchy of avoidance (most desirable), reduction, amelioration and compensation. It is considered that mitigation measures fall into two broad categories, and these are differentiated within assessment Chapters 5-17:

- Mitigation measures embedded in the design of the proposed Development (hereinafter referred to as **'Embedded Design Measures'**). These have been identified throughout the development of the proposal and are incorporated with the design of the proposed Development, such that it avoids key areas (by changes to layout) or includes features that would minimise the identified potential impacts on specific receptors (e.g. by incorporating measures to avoid pollution in the construction activities. The embedded design measures are considered to include good practice, that is standard approaches and actions commonly to avoid or reduce environmental impacts, and typically applicable across the proposed Development.
- **Additional Mitigation**. The potential likely significant effects which require mitigation are described for Technical Chapters 5-17, prior to the identification of appropriate additional mitigation measures (within the Design and Mitigation section). Additional mitigation is then identified, comprising any additional Development-specific measures needed to avoid, reduce or offset potential impacts that could otherwise result in effects considered significant in the context of the EIA Regulations (Ref. 1.1).

2.5.43 A discrete third category of mitigation relates to the principles enshrined within the Heritage Strategy (ES Appendix 4.12) and Conservation Management Plan (ES Appendix 9.25) which, as explained in paragraph 2.5.33, will need to be followed in any subsequent application for Westenhanger Castle and its future uses.

2.5.44 It is important to note that the embedded design measures have been assumed to be in place prior to the assessment of residual effects.

2.5.45 The embedded design measures and good practice are described in the respective assessment ES Chapters 5-17.

2.5.46 Details of additional mitigation measures are also outlined within each relevant topic chapter. These have been chosen following identification of potential environmental effects resulting from the proposed Development following the implementation of embedded design measures, and aim to reduce the

significance of potential environmental effects upon receptors and the wider environment to acceptable levels.

2.5.47 The provision of a detailed masterplan information at Tier 2 would be accompanied by further development of the mitigation measures proposed at the EIA (Tier 1) stage if necessary, but at a level of detail commensurate with the Tier 2 scheme design. An environmental report would be provided at this stage confirming compliance with the Tier 1 OPA conditions, including further consideration of appropriate mitigation measures at a level commensurate with the Tier 2 phase masterplan design,

2.5.48 Tier 3 applications (i.e. for detail of reserved matters) would further develop mitigation based upon Tier 2 but at the more detailed level of design that will address outstanding details of appearance, means of access, landscaping, layout and scale, to support the reserved matters applications.

2.5.49 The above process thus enables a step-wise approach to developing outline mitigation measures proposed at the EIA stage through to the reserved matters (detailed) stage.

2.5.50 All mitigation relied upon in this ES, both embedded design measures, is set out in full in a Commitments Register in ES Appendix 2.6. The Commitments Register also sets out all the commitments required in the planning application document. This register is a live document that will be updated throughout the application process.

Residual Effects

2.5.51 The Assessment of Residual and Cumulative Effects sections within each topic chapter describes any significant potential effects that remain after mitigation measures for the proposed Development have been considered and incorporated.

2.5.52 The residual effects will be considered during the decision-making process. The assessment of the significance of the residual effects after mitigation is a key outcome of the ES.

Cumulative Effects

2.5.53 The consideration of cumulative effects is also an integral part of undertaking an EIA and understanding the potential changes perceived by receptors. It plays an important role in considering the wider picture of potential significant environmental effects that may arise. Cumulative effects can occur in two ways as a result of development activities:

- Inter-project cumulative effects; and
- Intra-project cumulative effects.

Inter-project Cumulative Effects

2.5.54 There is a need to consider the relationship between the proposed Development and other off-site developments that will occur, or are expected to occur, which may give rise to “in-combination” effects. The potential for inter-project cumulative effects depends on a combination:

- The location of the off-site development; and
- The scale, nature and timing of the off-site development.

2.5.55 To identify if inter-project cumulative effects are likely to occur in combination with the operation or construction of the proposed Development, the following types of development have been considered:

- Approved schemes that are under construction but not yet in operation;
- Approved schemes that are not yet implemented or under construction; and
- Local plan policy allocations (identified in the adopted development plans).

2.5.56 The search for cumulative developments has been undertaken within the area identified in ES Appendix 2.5. This area was informed by the potential for inter-project cumulative effects within the zone of influence of the proposed Development, with the largest area of search for cumulative schemes being influenced by the Landscape and Visual impact and Transport cumulative assessments.

2.5.57 The committed development schemes reviewed by the EIA team are identified in ES Appendix 2.5 and have been referred to as appropriate within the cumulative assessment sections within each topic assessment chapter. The rationale for the selection of committed development schemes is explained in each of the chapters as appropriate.

2.5.58 The review of cumulative developments from F&HDC and Ashford Borough Council in October 2021 was undertaken to allow the completion of the cumulative effects assessment in the ES.

Inter-Project Cumulative Effects with the Framework Masterplan

2.5.59 The anticipated full build out of the Framework Masterplan to deliver 10,000 homes and additional associated infrastructure is also included in the Cumulative Effects assessment. Although not a consented scheme, it is considered to be a 'reasonably foreseeable project' and therefore has been assessed to the extent that it can be in terms of the identified site area and additional development quantum.

Inter-Project Cumulative Effects with the Permitted Waste Facility

2.5.60 An anaerobic digestion plant and associated office and parking facilities at Otterpool Quarry, Ashford Road Sellindge, was granted planning permission in 2011 (planning reference SH/08/124), hereafter referred to as the 'Permitted Waste Facility' (PWF). However, it is not anticipated that the permission (according to the landowner) will come forward on-site, further rationale is provided on this in the Infrastructure Assessment (ES Appendix 2.7). Given that KCC consider that this permission has been implemented, the PWF has nevertheless been assessed in each ES chapter as a scheme in the cumulative effects assessments.

2.5.61 This PWF development proposals include:

- A facility, including waste transfer station, that will manage co-mingled recyclable materials from commercial and industrial producers. The enclosed plant will also have the capacity to deal with possible future waste streams from municipal sources;
- An anaerobic digestion (AD) plant that will be in the form of an enclosed building housing waste reception and feedstock preparation areas, with the digestion tank and gas utilisation plant alongside;
- An external maturation pad for storing saleable product from the AD plant; and
- Associated office, mess and weighbridge facilities.

2.5.62 To ensure that a robust outline planning application is submitted, the applicant has submitted an alternative set of parameter plans (ES Appendix 2.8). These show how the proposed Development could come forward should the permitted waste facility be delivered in its currently consented location. This would result in 800 homes and 1 primary school less being delivered (compared to the scenario where the permitted waste facility is not delivered, as shown in Table 2-1).

2.5.63 It is anticipated that the S106 legal agreement attached to the outline planning permission will contain a clause which confirms that should an agreement with the permitted waste facility landowner not be reached and the permitted waste facility does come forward, the alternative parameter plans produced will come into force (rather than the parameter plans the applicant has submitted for approval (ES Appendix 4.2 which do not assume the permitted waste facility will come forward). The applicant will confirm the relevant scenario and associated plans at the point of delivery of the relevant phase.

2.5.64 An additional inter-project cumulative effects assessment scenario has been undertaken, to demonstrate that the permitted waste facility could be accommodated within the proposed Development. This additional scenario determines the potential for likely significant effects to arise as a result of the proposed Development and the PWF. This assessment scenario focuses on the assessment of potential residual effects (and therefore the likely significant effects) identified as part of the assessment of the proposed Development in isolation.

2.5.65 This assessment has been undertaken qualitatively or quantitatively, depending on the nature of the specific assessment and the potential for changes, and this is set out clearly within each topic assessment chapter.

Inter-project Cumulative Effects with Off-Site Infrastructure

2.5.66 Off-site infrastructure and enabling works are required as part of the proposed Development. All the off-site works will be delivered by the relevant statutory undertakers. The potential for inter-project cumulative interactions with between the off-site works and the proposed Development, and between the off-site works themselves, is assessed in ES Appendix 4.7.

Intra-project Cumulative Effects

2.5.67 The report ‘The State of Environmental Impact Assessment Practice in the UK (IEMA, 2011) (Ref. 2.5) states that intra-project effects 'occur between different environmental topics within the same proposal, as a result of the development's direct effects'.

2.5.68 Intra-project effects (also known as 'impact interactions') may arise from two or more scheme-related effects having a combined effect on a single receptor.

2.5.69 Key assessments that have included the consideration of intra-project effects during the construction and operational phases of the proposed Development are set out in Table 2-4 .

Table 2-4 Location of intra-project cumulative effects assessment

Receptors	5 - Agriculture and soils	6 - Air Quality	7 - Biodiversity	8- Climate Change	9 - Cultural Heritage	10 - Geology, Hydrogeology and Land Quality	11 - Human Health	12 - Landscape and Visual	13 - Noise and Vibration	14 - Socio-Economic and Community	15 - Surface Water Resources and Flood Risk	16 - Transport	17 - Waste and Resource Management	Location of intra-project cumulative assessment
Agricultural Land	X													No intra-project cumulative effect identified
Agricultural Businesses	X										X			No intra-project cumulative effect identified
Human receptors		X				X	X	X	X	X	X	X		11 - Human Health
Ecological Designated Sites		X	X	X										7 - Biodiversity
Habitats			X	X					X		X			7 - Biodiversity
Species			X	X					X		X			7 - Biodiversity
Global Climate				X							x			No intra-project cumulative effect identified
Designated Heritage Assets					X	X		X	X		X			9 - Cultural Heritage
Non-Designated Heritage Assets					X	X		X	X		X			9 - Cultural Heritage
Geological SSSI						X								No intra-project cumulative effect identified
Hydrogeology						X								No intra-project cumulative effect identified
Surface Water				X		X					X			15 - Surface Water Resources and Flood Risk
Geology						X								No intra-project cumulative effect identified
Kent Downs AONB								X						No intra-project cumulative effect identified
Landscape Character Areas								X						No intra-project cumulative effect identified
Local businesses	X			X						X				14 – Socio-Economics and Community
Local and wider economy	X			X	X			X		X		X		14 – Socio-Economics and Community
Landfill void capacity										X			X	No intra-project cumulative effect identified
Waste Generation										X			X	No intra-project cumulative effect identified
The proposed Development (including users)		X	X	X	X	X	X	X	X		X			8 – Climate Change

Table Note - Ecosystem services and biodiversity net gain have not been included within this table, as these are intrinsically cumulative assessments

Human receptors incorporates all people interacting with the proposed Development, for example residents, users and employees of businesses, recreational users etc.

Monitoring

2.5.70 Requirements for monitoring are set out in each of the topic chapters.

2.6 Environmental Statement Contents

2.6.1 The ES comprises the following volumes:

- ES Volume 1 – Non-Technical Summary;
- ES Volume 2 – Main ES report;
- ES Volume 3 – ES Appendices

2.6.2 A description of the contents of the ES Volumes is given below.

ES Volume 1 - Non-Technical Summary

2.6.3 A Non-Technical Summary has been prepared and bound separately to form Volume 1 of the ES. This summarises the information included in the ES in non-technical language that can be easily understood by the general public.

ES Volume 2 - Main ES report

2.6.4 The results of the EIA are documented in ES Volume 2 (this document).

2.6.5 Chapter 2: EIA Approach and Methodology (this chapter) provides background to the EIA process and approach to the ES.

2.6.6 Chapter 3: Development Need and Consideration of Alternatives explains the development need and the consideration of reasonable alternative development and the main reasons for the proposed Development.

2.6.7 Chapter 4: The Site and the proposed Development provides an overview of the current site and surroundings and a description of the proposed Development.

2.6.8 ES Chapters 5-17 provide the environmental topic assessments scoped into the EIA. Each of the ES chapters has a consistent structure including:

- An introduction;
- A review of relevant aspects of the proposed Development;
- Legislation policies and guidance and standards specific to the environmental topic;
- The approach and methodology used for the topic assessment;
- A description of the scoping and consultation undertaken;
- A description of the limitations of and assumptions included in the topic assessment;
- The baseline data against which the likely significant (beneficial or adverse) environmental effects have been assessed;
- A description of proposed mitigation measures to avoid, prevent, reduce or offset likely significant adverse effects, or enhancement measures to generate beneficial effects. It should be noted that mitigation measures are assumed to be in place prior to the assessment of residual effects assessment being undertaken;
- A description of the likely significant effects of the Development following the application of all mitigation measures;
- A description of the likely significant effects in-combination with those from other developments (‘inter-project cumulative effects’);
- A description of the monitoring requirements; and

- An assessment summary matrix identifying affected receptors, proposed mitigation/enhancement measures and the likely residual effects during construction and operation of the proposed Development.

ES Volumes 3 - ES Appendices

2.6.9 The main ES report findings are supported by additional data, detailed reports and plans provided in ES Volumes 3. References to the appendices data are provided to support the assessments as appropriate in the relevant ES chapters.

Supporting Planning Application Documents

2.6.10 Additional documents to this ES have been prepared and submitted separately as part of the planning application and provide source information to some of the ES chapters. These are set out in Table 2-5:

Table 2-5 Supporting Planning Application Documents

Doc Ref	Document	Author
Document submitted for approval		
OP5 Appendix 4.1	Development Specification	Quod
OP5 Appendix 4.2	Plans for Approval	Farrells
OP5 Appendix 4.3	Strategic Design Principles	Tibbalds
Documents submitted in support		
OP5 Appendix 2.6	Commitments Register	Arcadis
OP5 Appendix 2.7	Infrastructure Assessment (regarding permitted waste facility)	Quod
OP5 Appendix 2.8	Alternative Parameter Plans (with permitted waste facility in situ)	Farrells
OP5 Appendix 4.4	Illustrative accommodation schedule	Farrells
OP5 Appendix 4.5	Illustrative plans submitted in support	Farrells
OP5 Appendix 4.6	Indicative Phasing Plan submitted in support	Farrells
OP5 Appendix 4.8	Utility Strategy	Arcadis
OP5 Appendix 4.9	Energy Strategy	Arcadis
OP5 Appendix 4.10	Community Development and Facilities Strategy	Quod
OP5 Appendix 4.11	Green Infrastructure Strategy	Arcadis
OP5 Appendix 4.12	Heritage Strategy	Purcell
OP5 Appendix 4.13	Governance and Stewardship Strategy	Quod
OP5 Appendix 4.14	Housing Strategy	Quod
OP5 Appendix 4.15	Overarching Delivery Management Strategy	Arcadis

Doc Ref	Document	Author
OP5 Appendix 4.16	Design and Access Statement	Arcadis
OP5 Appendix 9.25	Conservation Management Plan	Purcell
OP5 Appendix 9.26	Scheduled Monument Consent Decision	Arcadis
OP5 Appendix 11.1	Health Impact Assessment	Arcadis
OP5 Appendix 11.2	Retail Impact Assessment	Quod
OP5 Appendix 12.5	Kentish Vernacular Study and Colour Studies	Farrells
OP5 Appendix 14.1	Economic Strategy	Quod
OP5 Appendix 15.1	Flood Risk Assessment and Surface Water Drainage Strategy	Arcadis
OP5 Appendix 15.2	Water Cycle Study	Arcadis
OP5 Appendix 15.3	Water Framework Directive Assessment	Arcadis
OP5 Appendix 16.4	Transport Assessment	Arcadis
OP5 Appendix 16.5	Transport Strategy	Arcadis
OP5 Appendix 16.6	Framework Travel Plan	Arcadis
OP5 Appendix 17.2	Minerals Assessment	SLR Consulting
OP5 Appendix 17.3	Outline site waste management plan	Arcadis
OP6	Guide to the Planning Application	Quod
OP7	Spatial Vision	Tibbalds
OP8	Planning and Delivery Statement	Quod
OP9	Sustainability Statement	Arcadis
OP10	Monitoring and Evaluation Framework document	WSP
OP11	Mobility Vision Report	WSP
OP12	User-centric travel document	WSP
OP13	Access and Movement Mode Share Targets	WSP
OP14	Cultural and Creative Strategy	Creative Folkestone
OP15	Statement of Community Involvement	Kevin Murray Associates
OP16	Supplemental Statement of Community Involvement	Quod

2.7 The Project Team

2.7.1 The EIA process has been managed and the ES compiled by Arcadis Consulting (UK) Limited ('Arcadis'). Arcadis is registered in the UK by the Institute of Environmental Management and Assessment (IEMA) as an Environmental Impact Assessor organisation and is a participant in IEMA's Quality Mark Scheme. The Quality Mark Scheme recognises that Arcadis produces ESs in accordance with current best practice standards and contributes to improved practice in the industry.

2.7.2 This ES has been prepared by Arcadis, with the exception of various ES Appendices produced by sub-consultants and referenced accordingly.

2.7.3 Regulation 18(5) of the EIA Regulations (Ref. 1.1) states that "in order to ensure the completeness and quality of the ES the developer must ensure that the environmental statement is prepared by competent experts; and the environmental statement must be accompanied by a statement from the developer outlining the relevant expertise or qualifications of such experts". The main contributors, including details of their professional qualifications, expertise and experience are outlined in ES Appendix 2.9.

2.7.4 In addition to the team preparing the ES, the following parties have contributed to the preparation of the planning application and have provided information that has been used in the preparation of the ES:

- Farrells and Partners – Masterplanners;
- Quod – Planning consultancy and Socio-economic advisors.

2.8 References

Reference	Title
Ref. 1.1	HMSO. Town and Country Planning (Environmental Impact Assessment) Regulations 2017 (SI 2017/571).
Ref. 2.1	IEMA (2004). Impact Assessment Guidelines and ES Review Criteria.
Ref. 2.2	NPPF (2021). Planning Practice Guidance on Environmental Impact Assessment.
Ref. 2.3	IEMA / RPS (2004). Guidelines for Environmental Impact Assessment.
Ref. 2.4	Department of Environment (1995). Guide on Environmental Statements for Planning Projects that Require Environmental Assessment.
Ref. 2.5	IEMA (2011). The State of Environmental Impact Assessment Practice in the UK.
Ref. 2.6	IEMA Environmental Impact Assessment Guide to Delivering Quality Development (July 2016)