

INTRODUCTION

- 2.1 This chapter of the ES sets out the overall approach to and methodology for undertaking the EIA. It details the process for identifying the environmental topics to be included in the EIA and the method of assessing the likely significant effects that have the potential to arise as a result of the Proposed Development, both during the enabling and construction works, and on completion and occupation of the Proposed Development.
- 2.2 Further detail on how the assessment methodology is applied to each topic is presented within the respective technical chapters of this **ES Volume 1, Chapters: 6 - 13**.

OUTLINE PLANNING APPLICATION

Form of the Planning Application

- 2.3 The Town and Country (Development Management Procedure) (England) Order 2015¹ ('DMPO') sets out requirements and guidance for outline planning applications. This planning application reserves all matters (with the exception of access) for later approval by Thanet District Council (TDC) through the submission of Reserved Matters Applications (RMAs).
- 2.4 In accordance with the DMPO, the following matters are reserved for later approval:
- **Amount of Development** – The specifics in terms of exact amount of floorspace for each land use sought for approval is not provided at this stage. Instead, a defined maximum land use quantum proposed within allocated land parcels for each Use Class is provided. The Development Specification sets out the Land Use Quantum and Land Use Distribution across the site;
 - **Layout** – As defined in the DMPO “the way in which buildings, routes and open spaces within the development are provided, situated and orientated in relation to each other” is reserved. Although reserved, the planning application seeks outline approval of parameters associated with the layout of the land uses and associated key open spaces and routes as set out in the Parameter Plans. The layout of land uses proposed are defined by land parcels based on their Use Class, open space provision or land allocated for transport infrastructure through the site. The precise alignment of the built development could deviate from the land use boundaries once the final alignment of streets is fixed through the RMAs. Land uses will be required to come forward within allocated land parcels of development in accordance with their Use Class or intended use;
 - **Scale** – As defined in the DMPO “the height, width and length of each building in relation to their surroundings” is reserved. However, in compliance with the DMPO, the planning application seeks approval for the maximum scale of the buildings within a range of +/- 2m from existing ground levels as shown on Parameter Plans. New buildings are to be limited in their distance from the rear of existing residential buildings and the width and length of land parcels are shown on the Parameter Plans;
 - **Appearance** – As defined in the DMPO “the aspects of a building or place within the development which determine the visual impression the building or place makes, including the external built form of the development, its architecture, materials, decoration, lighting, colour and texture” are reserved. However, the planning application will not seek approval for ‘appearance’ of the development at this stage. Appearance will be a planning condition attached to the outline planning consent. Character Areas which establish principles and/or a framework in relation to the appearance of the buildings will be illustrated within the Design and Access Statement which will accompany the planning application, The Character Areas are used for informative purposes only and is not used as the basis of assessment within the EIA; and
 - **Landscaping** – As defined in the DMPO “the treatment of land (other than buildings) for the purpose of enhancing or protecting the amenities of the site and the area in which it is situated and includes— (a) screening by fences, walls or other means; (b) the planting of trees, hedges, shrubs or grass; (c) the formation of banks, terraces or other earthworks; (d) the laying out or provision of gardens, courts, squares, water features, sculpture or public art; and (e) the provision of other amenity features” is reserved. The Parameter Plan identify the location of open space proposed across the site as defined on the Land Use and Green Infrastructure Parameter Plans in terms of the development’s layout. An illustrative master plan will also accompany the planning application which illustrates how the

development may come forward in the future in terms of open space and landscaping. The illustrative master plan is used for informative purposes only and is not used as the basis of assessment within the EIA.

- 2.5 However, the planning application seeks approval for details pertaining to **Access**, as defined by in the DMPO “means the accessibility to and within the site, for vehicles, cycles and pedestrians in terms of the positioning and treatment of access and circulation routes and how these fit into the surrounding access network”, which will be supported by the submission of detailed access layouts.

Basis of Assessment

Control Documents

- 2.6 The assessments contained within **ES Volume 1, Chapters: 6 to 13** are based on a set of Control Documents that define and describe the Proposed Development. The Control Documents consist of Parameter Plans, and a Development Specification.
- 2.7 They are documents and plans which describe the principal components of the Proposed Development, set controls and limits which define the scope of the Proposed Development and provide rules to guide future RMAs and the way in which the Proposed Development would come forward. Together, these documents allow the impacts of the Proposed Development to be identified and assessed with sufficient certainty.
- 2.8 The Control Documents that comprise the outline planning application (OPA) and for which outline planning permission is sought are as follows:
- **Parameter Plans** - these present outline parameters associated with the scale, layout, and land uses for the Proposed Development, comprising
 - Land Use Parameter Plan (Drawing Number: 020C)
 - Building Heights Parameter Plan (Drawing Number: 020E);
 - Green Infrastructure Parameter Plan (Drawing Number: 020D);
 - Density Parameter Plan (Drawing Number: 020B);
 - Movement and Access Parameter Plan (Drawing Number: 020A);
 - Land Budget (Drawing Number: 020F);
 - **Development Specification** – a document which defines and describes the principal components of the Proposed Development, including the form and content of the OPA as well as the parameters for future RMA's. The Development Specification outlines the maximum amount of development that could come forward across the site; land use quantum and distribution for both residential and non-residential uses, open space provision, access arrangements, building heights and density across the Proposed Development.
- 2.9 In addition, an Indicative Phasing Plan (Drawing Number: 020G) has been submitted as part of the OPA.

Assessment Scenarios

- 2.10 The information assessed differs in each technical discipline but is set out clearly in each chapter. The EIA assesses a reasonable, worst case scenario.
- 2.11 The assessments contained within **ES Volume 1, Chapter 6 to 13** assess the maximum quantum of development, layout, scale, and landscaping proposed across the site. For proposed land uses where flexibility is to be maintained (Use Class E), the least beneficial (lowest yielding) in terms of potential on site employment is considered as a reasonable, worst case scenario within the socio economic assessment (See **ES Volume 1, Chapter 6: Socio Economics**).
- 2.12 Enabling and construction effects are determined by the maximum quantum of development and the indicative construction programme provided in **ES Volume 1, Chapter 5: Enabling and Construction**. Where relevant, a peak construction year has been considered based on when construction activities are anticipated to be greatest. This is based on when construction road traffic is anticipated to be highest, construction is underway for later phases and residential dwellings are occupied in initial phases of the development.

¹ Town and Country Planning, England (2015). Available at: http://www.legislation.gov.uk/uksi/2015/595/pdfs/uksi_20150595_en.pdf

EIA GUIDANCE AND PLANNING POLICY

- 2.13 The ES has been prepared in accordance with applicable legislation, guidance, and case law. Specifically, this ES has been undertaken in accordance with the Institute of Environmental Management and Assessment (IEMA) Quality Mark indicator checklist and with due consideration to the following:
- At a European level, reference has been made to the European Commission's (EC) various EIA guidance documents <http://ec.europa.eu/environment/eia/eia-support.html>;
 - At a domestic level, reference has been made to the Department for Communities and Local Government's (DCLG) overarching Planning Practice Guidance²;
 - In addition, the Department for Transport 'Design Manual for Roads and Bridges Volume 11: Environmental Assessment'³ has been referred to as applicable;
 - In relation to publications from professional bodies, reference has been made to IEMA publications as these include best practice/suggested improvements to the EIA process. This includes:
 - IEMA ES Review Criteria (COM3-6)⁴;
 - IEMA 'Guidelines for Environmental Impact Assessment' (2004)⁵;
 - IEMA 'Special Report into the State Environmental Impact Assessment Practice in the UK' (2011)⁶;
 - IEMA 'Shaping Quality Development' (2015)⁷; and
 - IEMA 'Delivering Quality Development' (2016)⁸;
 - IEMA 'Delivering Proportionate EIA' (2017)⁹.
 - Whilst primarily written for major infrastructure projects, reference is also made to guidance/advice notes published by the National Infrastructure Planning¹⁰ where appropriate, as these can include relevant/helpful information.

Planning Policy Context

- 2.14 The EIA considers legislation and relevant national and local planning policy guidance as summarised below.

National Planning Policy Framework (2019)

- 2.15 The ES has had regard to the National Planning Policy Framework¹¹ (NPPF). The NPPF sets out the Government's economic, environmental and social planning policies for England. The policies contained within the NPPF articulate the Government's vision of sustainable development, which are intended to be interpreted at a local level, to meet the requirements of local aspirations.
- 2.16 The revised National Planning Policy Framework was last updated in June 2019 and sets out the government's planning policies for England and how these are expected to be applied. This revised Framework replaces the previous NPPF first published in March 2012. Its substantive replacement was published on 24 July 2018 and updated 19 February 2019 and 19 June 2019.
- 2.17 The ES has also had regard to the National Planning Practice Guidance¹² (PPG), which is an online resource. The PPG aims to make planning guidance more accessible, and to ensure that the guidance is kept up to date.

Regional Planning Policy and Guidance

- 2.18 The ES has had regard to regional Kent County Council (KCC) planning policy and guidance, namely the Kent Environment Strategy¹³ (March 2016), as relevant to the EIA technical topic scope and methodology for the assessment of effects. The Kent Environment Strategy outlines strategies for to support economic growth whilst protecting and enhancing the natural and historic environment of Kent.

² Gov.UK, Guidance Environmental Impact Assessment, <https://www.gov.uk/guidance/environmental-impact-assessment>

³ Department for Transport, 2008. Design Manual for Roads and Bridges Volume 11: Environmental Assessment.

⁴ Institute of Environmental Management and Assessment, undated; EIA Quality Mark – ES Review Criteria COM 3-6.

⁵ Institute of Environmental Management and Assessment, 2004, Guidelines for Environmental Impact Assessment.

⁶ Institute of Environmental Management and Assessment, 2011. The State of Environmental Impact Assessment Practice in the UK.

⁷ Institute of Environmental Management and Assessment, November 2015. Shaping Quality Development.

⁸ Institute of Environmental Management and Assessment, 2016; Delivering Quality Development.

Local Planning Policy

- 2.19 As relevant to the EIA technical topic scope, methodology or assessment of effects, the ES has had regard to the following key local planning policy.

Local Plan

- Local Plan (2020)¹⁴ – Thanet Local Plan was adopted on 9th July 2020. The plan outlines the strategy for the future of its area and includes the policies that will be used to direct development and determine applications for planning permission;
 - The local planning policy framework also comprises several policies in relation to but not limited to:
 - Economic Development & Regeneration;
 - Housing;
 - Transportation;
 - Heritage;
 - Countryside and Coasts;
 - Nature Conservation;
 - Environmental Protection; and
 - Community Facilities.
- 2.20 Any additional regional planning policy and guidance documents considered relevant to the technical assessments which are covered by the EIA are also considered within the respective technical ES Chapter.
- 2.21 In addition, where relevant to the assessment, the technical ES Chapters present a summary of any pertinent recognised industry guidance documents.

EIA SCOPING AND CONSULTATION

Consultation

- 2.22 Consultation with TDC and public engagement has helped inform the design of the Proposed Development. **ES Volume 1, Chapter 3: Alternatives and Design Evolution** provides a review of the consultation undertaken by the Project team in respect of the alternatives considered by the Applicant and the design evolution of the Proposed Development, with regard to environmental considerations.
- 2.23 The Application is supported by a Planning Statement and a Statement of Community Involvement which together summarise the wider consultation that has been undertaken with various consultees throughout the pre-application consultation process.
- 2.24 Where members of the Project team involved in the preparation of the technical ES Chapters have approached and consulted with TDC Officers (i.e. Environmental Health) or any statutory consultee representatives regarding their respective assessments, a summary is presented within the introduction table of the corresponding ES Chapter (see '**Consultation**').

EIA Scoping

- 2.25 Scoping forms one of the first stages of the EIA process and it is through EIA scoping that the Local Planning Authority (LPA) (in this case TDC) and other key statutory and non-statutory consultees are consulted on those environmental topics that should be included in the scope of the EIA.
- 2.26 The process of EIA scoping and consultation is important to the development of a comprehensive and balanced ES. Views of consultees have helped to identify specific issues that require further investigation as part of the EIA process.
- 2.27 The main purposes of the EIA scoping process include:

⁹ Institute of Environmental Management and Assessment, 2017; Delivering Proportionate EIA.

¹⁰ Website - <https://infrastructure.planninginspectorate.gov.uk/>

¹¹ Website - <https://www.gov.uk/government/collections/revised-national-planning-policy-framework>

¹² Website - <https://www.gov.uk/government/collections/planning-practice-guidance>

¹³ Kent Environment Strategy, March 2016. Available at: (https://www.kent.gov.uk/_data/assets/pdf_file/0020/10676/KES_Final.pdf)

¹⁴ Thanet Adopted Local Plan 2020. Available at: <https://www.thanet.gov.uk/wp-content/uploads/2018/03/Thanet-Local-Plan-July-2020-1.pdf>

- Definition of the approach to the EIA;
 - Identification of the availability of existing baseline data and appropriate baseline surveys to be undertaken;
 - Identification of sensitive receptors;
 - Identification of potential environmental considerations and potential environmental effects;
 - Identification of the topics to be included within the scope of the EIA;
 - Identification of any topics that can be scoped out of the EIA, with justification provided as to why likely significant residual environmental effects are not anticipated;
 - Definition of the methodology for the assessment of the likely significant environmental effects; and
 - Identification of other development schemes to be considered within a cumulative effects assessment.
- 2.28** An EIA Scoping Opinion Request was submitted to TDC on 11th October 2019. The Scoping Report is provided in **ES Volume 2, Appendix: EIA Scoping - Annex 1**.
- 2.29** The EIA scoping process has informed the content of this ES. The EIA scoping process considered the potential for likely significant effects associated with the following technical topics and other relevant considerations:
- Agriculture (Land Take and Soils);
 - Air Quality;
 - Arboriculture;
 - Aviation;
 - Climate Change;
 - Cultural Heritage – Built Heritage and Archeology;
 - Daylight, Sunlight, Overshadowing, Light Pollution and Solar Glare;
 - Ecology and Biodiversity;
 - Ground Conditions (Land Contamination / Geo-Environmental);
 - Human Health;
 - Landscape and Visual Impact;
 - Noise and Vibration;
 - Project Vulnerability;
 - Socio-Economics;
 - Traffic and Transport;
 - Television and Radio;
 - Waste; and
 - Water Resources, Drainage and Flood Risk.
- 2.30** The following technical topics have been considered within the EIA and were scoped into the EIA:
- Socio Economics and Health (ES Volume 1: Chapter 6);
 - Traffic and Transport (ES Volume 1: Chapter 7);
 - Air Quality (ES Volume 1: Chapter 8);
 - Noise and Vibration (ES Volume 1: Chapter 9);
 - Agriculture (ES Volume 1: Chapter 10);
 - Ecology and Biodiversity (ES Volume 1: Chapter 11);

- Cultural Heritage (ES Volume 1: Chapter 12);
 - Landscape and Visual Impact Assessment (ES Volume 1: Chapter 13);
 - Greenhouse Gases (ES Volume 2).
- 2.31** The EIA Scoping process identified several environmental topic areas which are not likely to give rise to significant environmental effects and therefore would not need to be assessed further as part of the EIA. Full details of the justification for scoping these topics out can be found within **ES Volume 2, Appendix EIA Scoping: Annex 1**.
- 2.32** In summary, the topics presented within the Scoping Report to be scoped out of the EIA include:
- Aviation;
 - Daylight, Sunlight and Overshadowing;
 - TV and Radio Interference;
 - Waste; and
 - Electronic Interference.
- 2.33** The following topics were scoped out of the final ES on the basis that each were supported by a stand-alone technical assessment where adverse environmental effects were identified, standard mitigation measures have been committed to as part of the planning application:
- Arboriculture; and
 - Geo-environmental (Ground Conditions, Groundwater and Land Take and Soils). Land Take has also been considered within **ES Volume 1, Chapter 10: Agriculture**.
- 2.34** Refer to **ES Volume 1, Chapter 14: Mitigation and Monitoring** for further details on these standard mitigation measures that will be implemented as part of subsequent stages of development.

Scoping Opinion

- 2.35** TDC issued their EIA Scoping Opinion on 21st January 2020, which is provided in **ES Volume 2, Appendix EIA Scoping Report: Annex 2**.
- 2.36** EIA scoping is a consultative and iterative process and as such, a number of EIA scoping points were discussed between the Applicant's EIA team and TDC during the EIA scoping process. Where clarifications required additions or variations to the assessment scope set out within the Scoping Report, these have been addressed as part of the ES. The front of each of the technical chapters included within this ES provides an overview of relevant consultation correspondence undertaken as part of the EIA, as well as context (if needed) for points raised during the EIA Scoping process.
- 2.37** As part of the EIA scoping process, the following points (see Table 2.1) were clarified with the TDC in regard to their final Scoping Opinion.

Table 2.1 EIA Scoping Clarifications

Technical Topic	EIA Clarification
Aviation	Manston Airport: Considering the determination of the Manston Airport DCO in July 2020 the SW Birchington ES includes reference to this application. A statement is included within the ES chapters (where relevant) to confirm the likelihood of any significant environmental effects. It is recognised that based on a review of the publicly available information to date, the Manston Airport DCO is unlikely to result in significant cumulative environmental effects. This will be reiterated within relevant chapters where necessary.
Agriculture	Cumulative Agriculture Impact Assessment: Reference is made to the cumulative impact assessment evidence completed as part of the Local Plan process as part of the Agricultural ES chapter. Further assessment of the potential for significant cumulative effects as a result of the loss to agricultural land within the surrounding area is not necessary, however the Agriculture ES chapter includes a brief summary of the results of the Local Plan as an evidence base.
Air Quality	Baseline concentrations of nitrogen dioxide (NO₂): Baseline conditions reflecting the trend that NO ₂ will decrease in future will form the basis of assessment of baseline conditions within the Air Quality ES

Technical Topic	EIA Clarification
	Chapter. Reference to recently published findings ¹⁵ was shared with TDC's Environmental Health Officer (EHO). The Air Quality ES Chapter makes reference to the most recent published TDC air quality monitoring results within the Annual Status Report 2019 (https://www.thanet.gov.uk/info-pages/air-quality) to verify existing baseline NO ₂ levels with the surrounding area.
Landscape and Visual Impact Assessment	<p>The assessment will be based on professional judgement, based on representative views, the locations of which have been agreed with TDC. Verified views will not be included within the assessment of this outline scheme and the LVIA Lead has frequently assessed outline applications without the use of verified views. This approach has been used recently for <i>Land at Hawkhurst Golf Club</i> in Kent for an outline application for +400 homes and relief road in an AONB, where the LVIA assessed the visual impact, accompanied by Site Photographs. The LVIA Lead are comfortable that visual impact as a result of the Proposed Development can be sufficiently determined through the Site Photographs in context to the surrounding landscape conditions and adjoining properties. An illustrative visual of example Proposed Development character areas will be included for reference within the Design and Access Statement which will accompany the planning application.</p> <p>Land grading and cut & fill assumptions: Detail of land grading and cut and fill will not be provided as part of the ES as it does not form the basis of assessment for the Landscape and Visual Impact assessment. Details regarding any land grading and cut and fill specifications will be submitted as part of subsequent Reserved Matters Applications (RMAs) for the site.</p>
Ecology and Biodiversity	<p>In line with the Strategic Access Management and Monitoring Plan (SAMMS) in respect of the Thanet section of the Thanet Coast and Sandwich Bay SPA¹⁶, the plan does not appear to have an upper limit to the number of dwellings in which to quantify contributions. The SAMMS plan states that the <i>'Effectiveness in displacing coastal visits is unproven, however the results of the visitor survey indicated there may be willingness for some dog walkers to visit alternative sites if provided'</i>. Given the effectiveness is unproven, (and only 16% of the respondents would exercise their dog at an alternative inland site) the Parameter Plans include provision for suitable sites for dog exercise in accordance with published advice (as referenced in the SAMMS Plan) including <i>Hampshire's Planning for Dog ownership in New Developments</i>¹⁷.</p> <p>Mitigation measures in line with the SAMMS Plan Table 3 are illustrated on the Parameter Plans where relevant. Consultation with Natural England is ongoing and is described within the Ecology and Biodiversity ES Chapter.</p>

GENERAL EIA METHODOLOGY

2.38 Detailed methodologies for the assessment of each of the environmental topic areas scoped into the EIA are provided within each technical ES Chapter (**ES Volume 1, Chapters: 6 to 13**), however, in general terms, the assessments have been based upon:

- Understanding the baseline condition, either through:
 - Desk-top studies;
 - Site surveys;
- Understanding the policy context and the implications for assessment, including:
 - Consideration of relevant legislation;
 - Consideration of relevant planning policies (national, regional and local);
- Identify potentially sensitive receptors that could be impacted by the Proposed Development;
- Identification of potential environmental impacts, with an evaluation of their likely magnitude, and resultant effects in terms of their nature, scale, geographic extent, duration and whether they are direct or indirect or transboundary, involving either:
 - The use of technical guidance and best practice; and/or
 - Expert opinion;
- Consideration of the requirement for any specific mitigation; and

¹⁵ Air Quality Consultants, October 2019. Nitrogen Dioxide and Nitrogen Oxides Trends in the UK 2005 to 2018. Available online: <https://www.aqconsultants.co.uk/CMSPages/GetFile.aspx?guid=feb92332-26f7-4989-b86a-21e5732a5404>

¹⁶ Thanet Government April 2016, Strategic Access Management and Monitoring Plan in respect of the Thanet section of the Thanet Coast and Sandwich Bay SPA. Available online: <https://www.thanet.gov.uk/wp-content/uploads/2018/03/Thanet-DC-SAMM-MAIN-REPORT-Final-21st-April-2016.pdf>

- Consultation with any interested and affected parties.
- 2.39** How the Proposed Development might affect the environment relies on predictions about what impact a certain action will have. Some predictions can be made using mathematical or simulation models (i.e. quantitative assessment). Other impacts are less easy to predict in quantitative terms, and in such cases, the EIA attempts to quantify the anticipated scale of impact using professional judgement (i.e. qualitative assessment).
- 2.40** As part of the EIA, an iterative approach has been adopted where significant environmental effects have been identified and avoided where possible in the first instance through consideration of alternative design solutions and design refinements, as reported upon within **ES Volume 1, Chapter 3: Alternatives and Design Evolution**. Where able, opportunities to reduce or control impacts and effects have been identified and incorporated into the Proposed Development (i.e. primary mitigation¹⁸). In addition, the design process seeks to promote opportunities to enhance the beneficial environmental effects of the Proposed Development.
- 2.41** Mitigation is the term used to refer to the process of avoiding where possible and, if not, minimising, controlling and/or off-setting potentially significant adverse effects of a development. Mitigation measures can relate to the masterplanning stage; detailed design stage; the construction stage; or the activities associated with the operation of the completed Proposed Development. Where mitigation has been embedded within the masterplan of the Proposed Development to avoid or reduce potentially significant effects are described within **ES Volume 1, Chapter 4: The Proposed Development**. Where relevant these measures are also described within the technical chapters of the ES (**ES Volume 1, Chapters: 6 to 13**).
- 2.42** In accordance with the EIA Regulations, the method behind the EIA process generally considers the existing conditions of the area into which the development is being introduced (the **baseline**), providing a **future baseline** in some cases where the area around the site is undergoing extensive, planned, change and is evolving rapidly, and makes reasonable predictions of the likely change (the **impact** – in terms of magnitude) that may occur, during both its construction and when the development is completed and operating as proposed. The predicted impact is considered in terms of key environmental and social aspects (**receptors**) found within the surrounding area, and based on their sensitivity to change, the scale of the resulting change experienced by the receptor / resource (the **effect**) is then determined along with a statement on whether the effect is significant or not.
- 2.43** Any mitigation measures required to reduce or eliminate significant adverse effects are then considered and assessed, with the resulting residual effect scale being determined. Effects resulting from a combination of the Proposed Development and other surrounding schemes (**cumulative schemes**) are also assessed. All the likely effects of the development are reported (within an **environmental statement**) and the likely significant effects are specifically highlighted. The environmental statement is then considered by the relevant planning authority when deciding whether to grant planning permission for a development.

Baseline Conditions

- 2.44** The baseline comprises existing information, information either collected through baseline surveys undertaken during the course of the EIA process. This information has been used in the ES to present (within each of the individual technical ES Chapters (**ES Volume 1, Chapters: 6 to 13**)) an up to date description of the current baseline conditions of the site and surrounding area.
- 2.45** The purpose of the EIA is to predict how environmental conditions may change as a result of the Proposed Development. The assessment of the nature and scale of a predicted change is undertaken against a reference condition, known as the 'baseline'. In most cases, the baseline represents the environmental condition of the site being assessed and the surrounding area at the time of the assessment.
- 2.46** For most technical disciplines, the baseline has been taken as the existing conditions within the site. However, in some cases it may be necessary to apply a 'future' baseline. This is relevant when considering the peak construction year once the development is open but not yet completed and fully occupied. A future baseline is also used for when considering potential effects when the development is complete and fully operational.
- 2.47** Where this is required, the approach to defining the future baseline has been explained (with reference to the assessment scenarios) within the relevant technical ES Chapter (for example **ES Volume 1, Chapter 7: Traffic and Transport, ES Volume 1, Chapter 8: Air Quality, ES Volume 1, Chapter 9: Noise and Vibration**).

¹⁷ Hampshire County Council March 2013, Planning for Dog Ownership in New Developments: Reducing Conflict – Adding Value. Available online: <https://documents.hants.gov.uk/ccbs/countryside/planningfordogownership.pdf>

¹⁸ IEMA July 2016, Environmental Impact Assessment Guide to: Developing Quality Development) <https://www.iema.net/assets/newbuild/documents/Delivering%20Quality%20Development.pdf>.

Evolution of the Baseline

2.48 In accordance with the requirements of the EIA Regulations, consideration as to how the existing baseline condition may evolve in the future in the absence of the Proposed Development. The EIA Regulations state (Schedule 4(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.”

2.49 This requirement has been addressed in the ES (within each of the individual technical ES Chapters (**ES Volume 1, Chapters: 6 to 13**) under the heading ‘*Evolution of the Baseline Condition*’. The description of the evolved baseline has been characterised by interpreting an indeterminate point in the future, for a scenario which assumes that all the committed developments are built¹⁹, in the absence of the Proposed Development being implemented. For both the Landscape and Visual Impact assessment and the Ecology assessment, consideration has also been given to the natural evolution of relevant features, though this is considered in the context of the existing uses (both onsite and in the surrounding area) and their likeliness to affect any natural evolution.

2.50 The likely evolution of the baseline conditions will be quantified where possible. Where not possible, a qualitative review will be presented. The approach taken to providing an outline of the evolution of the baseline will be described within each of the individual technical ES Chapters (**ES Volume 1, Chapters: 6 to 13**).

Sensitive Receptors

2.51 When undertaking an EIA, it is important to identify key potential receptors from the surrounding baseline context which may be impacted by the Proposed Development and may need to be considered as part of the assessment.

2.52 Within each of the technical ES Chapters (**ES Volume 1, Chapters: 6 to 13**), a list of sensitive receptors is presented which are considered to have the potential to be affected by the Proposed Development.

2.53 The sensitive receptors identified within the technical ES Chapters have been identified from a review of the available information collected as part of the description of the surrounding environmental and socio-economic context, as well as from historic and currently available information relating to the site itself (presented as part of the ‘Baseline’ description within the respective ES Chapter). Potential receptors have also been identified from a review of the description of the Proposed Development sought for approval (see **ES Volume 1, Chapter 4: The Proposed Development**) and the potential impacts and resultant effects which may occur as a result of the redevelopment of the site.

Impact Assessment

2.54 Impact assessments are undertaken for the following stages of the Proposed Development:

- During the enabling and construction works; and
- Once the Proposed Development is complete and occupied.

Enabling and Construction Effects

2.55 The **ES Volume 1, Chapter 5: Enabling and Construction** provides an outline of the anticipated enabling and construction programme, as well as related activities and aspects (i.e. enabling works, excavation volumes and construction material quantities, HGV movements and HGV routing). Enabling and construction assumptions were developed based on the maximum quantum of development, layout and scale of the development in combination with professional judgment at this stage.

2.56 The programme represented is based on reasonable assumptions in terms of the sequencing of the works and site logistics that will be implemented. The programme is considered achievable based on the current level of enabling and construction planning and anticipates the period of construction works are continuous. The programme presents an overlap of construction activities with other stages of work and therefore assumes multiple construction activities occurring across the site. It is also assumed that impacts of a higher magnitude over a shorter duration are considered to be potentially greater in terms of the likely effect on a receptor, than an impact of lower magnitude spread over a longer duration. The EIA, therefore, assesses the worst-case

effects (in terms of magnitude of impact) as a result of multiple construction activities occurring on-site at any particular time.

2.57 The information presented has informed the enabling and construction impact assessments of each technical ES Chapters (**ES Volume 1, Chapters: 6 to 13**).

2.58 In summary, the ES includes a quantitative assessment of the phased construction related effects for the following technical topics: traffic, air quality and noise and vibration.

2.59 Within the construction impact assessments, standard environmental controls required under legislation and best practice guidance will be considered (i.e. embedded mitigation) and will be clearly presented within the respective technical ES Chapter as to how they are accounted for within the corresponding assessment and summarised within **ES Volume 1, Chapter 14: Mitigation and Monitoring**.

2.60 The construction assessments will also identify (where required) the need for any additional or bespoke environmental management or mitigation measures in order avoid, prevent, reduce or off-set any significant adverse effects identified.

2.61 A description of any proposed monitoring arrangements will also be identified and would define (where appropriate) the procedures regarding the monitoring of the relevant significant adverse effects, the types of parameters to be monitored and the monitoring duration.

2.62 All the measures proposed within the technical ES Chapters will be compiled and presented in a mitigation and monitoring schedule within **ES Volume 1, Chapter 14: Mitigation and Monitoring**.

2.63 It is anticipated that any required construction related environmental management / mitigation and monitoring measures identified within the ES would be secured and controlled through appropriate Construction Environmental Management Plan (CEMP) and Construction Logistics Plan (CLP) (further discussed within **ES Volume 1, Chapter 14: Mitigation and Monitoring** and it is proposed that the requirement for these documents be secured by means of suitably worded planning conditions to be attached to the permissions.

Completed and Occupied Development Effects

2.64 The ES presents a description of the Proposed Development in **ES Volume 1, Chapter 4: The Proposed Development** in order to provide suitable context to enable the assessment of potential and likely significant environmental effects. The impact assessment of the Proposed Development is based on the information contained within the Control Documents and as described in **ES Volume 1, Chapter 4: The Proposed Development**. In addition, where necessary to inform the impact assessments, information on the masterplan has been taken from other documents that have been prepared for the purposes of and which, are submitted in support of the planning application, for example, the Design and Access Statement, Outline Energy Strategy, Sustainability Statement, Planning Statement and Transport Assessment. Where information from these documents have been relied upon, the information has been presented within the ES.

2.65 The impact assessment has been undertaken against an appropriate baseline condition for the technical topic in question. However, where relevant to an individual technical assessment, the Proposed Development has been assessed against a future baseline. This then means that the impact assessments account for potentially sensitive receptors found within the existing baseline conditions and any additional potentially sensitive receptors that may be apparent within the surrounding area in the future. The specific methodology for assessment of the Proposed Development (including the parameters assessed to predict a reasonable worst case assumption) has been set out within the technical chapters of **ES Volume 1 (Chapters 6-13)**.

Cumulative Effects

Effect Interactions (Intra-project effects)

2.66 Intra-project cumulative effects from the Proposed Development itself on surrounding sensitive receptors during the construction works and also once the Proposed Development is completed are considered within this ES (**ES Volume 1, Chapter 15: Effects Interactions**). It is possible however, that depending on the predicted individual ‘completed development’ effects, only the enabling and construction work effects are actually considered as often they generate the greatest likelihood of interactions occurring and hence significant effect interactions. The enabling and construction effects are usually more adverse (albeit on a temporary basis) than effects as a result of a completed development.

¹⁹ The approach adopts the rationale that if there are committed developments identified (i.e. existing and/or approved projects) to come forward in the future, this would account for a ‘natural change’ to the baseline scenario.

- 2.67** Dependent on the relevant sensitive receptors, the assessment focuses either on key individual receptors or on groups considered to be most sensitive to potential interacting effects. The criteria for identifying those receptors which are considered to be potentially sensitive include existing land uses, proximity to the construction works and the site, and likely duration of exposure to impacts.
- 2.68** It should be noted that only residual effects that are minor, moderate or major in scale are considered within this assessment, as negligible effects are, by definition, imperceptible in their nature. The results are presented within **ES Volume 1, Chapter 15: Effects Interactions**.
- 2.69** Professional judgement has been used to determine whether the residual effects of the Proposed Development could interact to result in a potential in-combination effect or effect interaction on the receptor in question.
- 2.70** The scale of an effect interaction is not assigned as part of this assessment; however, whether the in-combination effects / effect interaction is considered to be significant or not is identified. For example, when one or more residual significant effects (i.e. effects that are moderate or major in scale) from different EIA topics (i.e. air quality, noise and vibration, HGV traffic or visual impact) coincide on a receptor, the effect interaction has been identified as significant.
- 2.71** Further information on the methodology and the results of the in-combination effects / effect interactions assessment are presented within the **ES Volume 1, Chapter 15: Effects Interactions**.

Cumulative Effects with Other Committed Developments (Inter-project Effects)

- 2.72** The EIA Regulations require that, in assessing the effects of a particular development proposal, consideration should also be given to the likely significant effects arising from the “*cumulation with other existing and/or approved projects*” (Schedule 4, 5(e)).
- 2.73** Cumulative effects can occur as interactions between the effects associated with a number of projects in an area which may, on an individual basis be insignificant, but together (i.e. cumulatively), result in a significant effect. Cumulative effects arising from the Proposed Development in combination with ‘other existing and / or approved projects’ (‘committed developments’) will be considered throughout the ES. The potential for cumulative effects arising during the enabling and construction works, and once the Proposed Development is complete and operational, will be considered. Each individual technical chapter of the ES will present an assessment of the cumulative effects of the Proposed Development coming forward alongside the cumulative schemes.
- 2.74** The cumulative schemes that will be considered within the ES will typically be located within a 1km radius from the site, as this spatial extent is considered appropriate for determining cumulative effects in this locality.
- 2.75** With regards to traffic and transport considerations, major schemes beyond the 1km radius may also be accounted for to acknowledge the spatial connection with the Proposed Development via the local road network. It should be noted that the approach to the assessment of cumulative effects is synonymous with the impact assessment methodology by virtue of the fact that deriving a future road traffic baseline would account for road traffic movements associated with the cumulative schemes as background road traffic growth, many of which are likely to be more than 1km distant on the road network from the site. Cumulative schemes within the surrounding area for the purpose of the traffic and transport, air quality and noise and vibration assessment have considered sites allocated for redevelopment under the Local Plan in regard to road traffic and its associated effects. This approach is entirely appropriate, given the potential for wider reaching traffic and transport impacts through the highway network.
- 2.76** Generally, the schemes to be included within a cumulative effects assessment will either have:
- Full planning consent, or a resolution to grant consent; and
 - Produce an uplift of more than 10,000 m² (Gross External Area (GEA)) of mixed-use floorspace, or over 150 residential units.
- 2.77** These parameters have been set to allow for an initial screening exercise to determine the schemes that, based on the scale of redevelopment (amount and mix of uses), could potentially have a cumulative effect with the Proposed Development and should be considered further within the cumulative effects assessment of the EIA. By applying these parameters to all the schemes coming forward, the cumulative effects assessment of the EIA becomes more focused on the larger schemes (i.e. those with the potential to interact in a cumulative manner), rather than trying to assess all applications for planning permission, including proposals for smaller, domestic applications such as loft and garage conversions, or small scale changes of use.

- 2.78** Thanet Earth (F/TH/12/0327) is the only committed development that meets the above described criteria. However, where relevant cumulative schemes in the form of sites allocated for redevelopment under the Local Plan have been considered within each technical ES chapter. Where cumulative schemes are ‘screened’ (i.e. schemes selected for inclusion in the assessment), each technical ES Chapter will be clear on the cumulative schemes that have been considered within the cumulative effects assessment.
- 2.79** The screening exercise for selecting schemes for the cumulative assessment has also been accounted for as part of the EIA Scoping process (refer ‘*EIA Scoping and Consultation*’ section earlier), providing TDC and consultees the ability to comment on the schemes presented, and also the opportunity to identify any additional developments that should be considered within the cumulative effects assessment of the EIA.

Climate Change

- 2.80** The EIA Regulations also seek to account for climate by requiring a description of “*the impact of the project on climate*” and “*the vulnerability of the project to climate change*” (Schedule 4, paragraph 5(f)).
- 2.81** The approach to assessing the potential impact of the Proposed Development on climate has been undertaken in accordance with the IEMA guidance ‘Assessing Greenhouse Gas Emissions and Evaluating Their Significance’²⁰. This guidance sets out a ‘good practice’ approach to achieving a proportionate assessment of a development’s potential impact on climate and communicating the results in terms of notional percentage contribution relative to carbon budgets, together with appropriate mitigation. The assessment of GHG emissions (essentially a carbon footprint or ‘inventory’ of the Proposed Development) and an outline of the carbon mitigation measures proposed is presented in a technical report and included within **ES Volume 2, Appendix: Greenhouse Gases – Annex 1**. Relevant information from this report (specifically relating to carbon mitigation measures) is presented within **ES Volume 1, Chapter 4: Proposed Development**.
- 2.82** The approach adopted to assessing the potential impact of climate change on the Proposed Development is set out within **ES Volume 2, Appendix: Greenhouse Gases - Annex 1**. The approach has been undertaken in line with the IEMA guidance ‘Environmental Impact Assessment Guide to: Climate Change Resilience and Adaption’ (2020)²¹, which presents a framework for the consideration of climate change resilience and adaption in the EIA process. Consistent with the guidance, **ES Volume 2, Appendix: Greenhouse Gases - Annex 1** describes a future climate scenario which has been developed through the use of the future climate projections published by the Met Office (through the UK Climate Projections (UKPC18) website). The results include projections for variables including annual mean temperatures, and annual changes in summer and winter precipitation.
- 2.83** As relevant, the technical assessments within this ES (**Volume 1, Chapters: 6-13**), have assessed, using the UKPC18 data where available, the potential impacts and associated effects of climate change on the Proposed Development. This has been quantified where possible, and where not possible, a qualitative review is presented.

IDENTIFICATION OF IMPACTS, EFFECTS AND EFFECT SIGNIFICANCE

Terminology and Definitions

Reference to ‘Impact’ and ‘Effect’

- 2.84** The terms ‘impact’ and ‘effect’ are distinctly different. Having gained an understanding of the likely impact it is then important to know whether the change in environmental or socio-economic conditions results in a significant environmental effect. The impacts of the Proposed Development may or may not result in significant effects on the environment, depending on the sensitivity of the resource or receptor and potentially other factors (such as duration). The assessment of the likely significant effects of the development is a requirement identified by Schedule 4 of the EIA Regulations.

Receptor Sensitivity and Magnitude of Impact

- 2.85** To achieve a consistent approach across the different technical disciplines addressed within the ES, assessments broadly define the sensitivity of the receptors that could be affected by the Proposed Development and the magnitude of impact or change from the baseline conditions in order to derive the resultant effect.

²⁰ IEMA, 2017. *Assessing Greenhouse Gas Emissions and Evaluating Their Significance*. IEMA.

²¹ IEMA (2020); *Environmental Impact Assessment Guide to: Climate Change Resilience and Adaptation*.

2.86 Terminology available to describe the sensitivity of receptors and magnitude of impact or change from the baseline conditions is broadly as follows:

- High;
- Medium;
- Low;
- Negligible; and
- No Impact (in relation to magnitude of impact or change only).

2.87 Each of the technical assessment chapters of the ES (**ES Volume 1, Chapters: 6 - 10**) provide further detail on the definition of each of the above terms specific to the topic in question and also provide the criteria, including sources and justifications, for quantifying the different levels of receptor sensitivity and 'impact magnitude'. Where possible, this is based upon quantitative and accepted criteria (for example, national standards for air quality and noise), together with the use of value judgement and expert interpretation.

2.88 Alternatively, some technical assessment chapters differ in the terminology adopted to describe the magnitude of impact or change from the baseline conditions. Where this occurs, the alternative terminology adopted has been clearly set out within the individual ES chapter.

Identification of the Scale of Effect

2.89 The basis for determining the resultant scale of effect generally takes into account the sensitivity of the receptor and magnitude of impact or change from the baseline conditions, which when combining these two factors into a matrix, can help determine the resultant scale of effect (an example matrix as shown in Table 2.2 – this may be adjusted to suit the technical topic in question).

Table 2.2 Scale of Effect Matrix

Receptor Sensitivity	Magnitude of Impact			
	High	Medium	Low	Negligible
High	Major	Major	Moderate	Minor
Medium	Major	Moderate	Minor	Negligible
Low	Moderate	Minor	Negligible	Negligible
Negligible	Minor	Negligible	Negligible	Negligible

2.90 Table 2.3 provides the broad definition of the 'scale' of the resultant effect i.e. definitions of Major, Moderate, Minor and Negligible effects. The definitions in Table 2.3 may be adjusted to suit the technical topic in question; where this is the case revised definitions of effect scale are presented in the technical assessment chapters (**ES Volume 1, Chapters: 6 - 13**).

2.91 Where there is 'No Effect' this is stated.

Table 2.3 Broad Definitions of the Scale of the Effect

Scale of Effect	Description
Major	These effects may represent key factors in the decision-making process. Potentially associated with sites and features of national importance or could be important considerations at a regional or district scale. Major effects may also relate to resources or features which are unique to a receptor and which, if lost, cannot be replaced or relocated.
Moderate	These effects, if adverse, are likely to be important at a local scale and on their own could have a material influence on decision-making.
Minor	These effects may be raised as local issues and may be of relevance in the detailed design of the project but, are unlikely to be critical in the decision-making process.
Negligible	Effects which are beneath levels of perception, within normal bounds of variation or within the margin of forecasting error, these effects are unlikely to influence decision-making, irrespective of other effects.

Effect Nature

2.92 Table 2.4 provides a definition of the 'nature' of the resultant effect.

Table 2.4 Definition of the Nature of the Effect

Nature of Effect	Description
Adverse	Detrimental or negative effects to an environmental / socio-economic resource or receptor. The quality of the environment is diminished or harmed.
Neutral	The quality of the environment is preserved or sustained or where there is an equal balance of benefit and harm.
Beneficial	Advantageous or positive effect to an environmental / socio-economic resource or receptor. The quality of the environment is enhanced.

Geographic Extent of Effect

2.93 The ES (Volume 1) identifies the geographic extent of the identified effects. At a spatial level, 'site' or 'local' effects are those affecting the site and neighbouring receptors, while effects upon receptors in the wider area / district, beyond the vicinity of the site and its neighbours, are at a 'district' level. Effects affecting Kent are at a 'regional' level, whilst those which affect different parts of the country, or England, are considered being at a 'national' level.

Effect Duration

2.94 For the purposes of the ES, effects that are generated as a result of the construction works (i.e. those that last for this set period of time) will be classed as 'temporary'; these may be further classified as either 'short term' or 'medium-term' effects depending on the duration of the construction works that generate the effect in question. Effects that result from the completed and operational Proposed Development will be classed as 'permanent' or 'long-term' effects.

2.95 Effects classified as being irreversible are those which are permanent and cannot be revoked.

Direct and Indirect Effects

2.96 The ES identifies whether the effect is 'direct' (i.e. resulting without any intervening factors) or 'indirect' or 'secondary' (i.e. not directly caused or resulting from something else).

Residual Effects

2.97 Where mitigation measures are identified to either eliminate or reduce adverse effects, these will be incorporated into the ES, for example either through the design, or will be translated into construction commitments; or operational or managerial standards / procedures.

2.98 The ES will then highlight the 'residual' effects (those effects which remain following the implementation of suitable mitigation measures) and classifies these in accordance with the terminology defined above.

Effect Significance

2.99 Following identification of an effect, the effect scale, nature, geographic extent and duration and whether the effects are direct or indirect, using the above summarised terminology, a clear statement is then made within the ES (Volumes 1) as to whether the effect is significant or not significant. As a general rule, the following applies:

- 'Moderate' or 'major' effects are deemed to be 'significant';
- 'Minor' effects are 'not significant', although they may be a matter of local concern; and
- 'Negligible' effects are 'not significant' and not a matter of local concern.

2.100 Where this differs for a particular technical assessment, an explanation will be provided within the methodology section of the relevant topic's ES chapter.

STRUCTURE OF TECHNICAL ASSESSMENTS

2.101 This ES reports on the potential (before mitigation) and residual (after mitigation) environmental effects of the Proposed Development during the enabling and construction works and on subsequent completion and operation. The ES also concludes with a summary of the likely significant beneficial, neutral and adverse environmental effects of the Proposed Development (**ES Volume 1, Chapter 16: Likely Significant Effects**).

2.102 Each of the environmental topics considered in the EIA has been assigned a separate chapter in **ES Volume 1 (Chapter 6 to Chapter 13 inclusive)**. Within each of the ES Volume 1 technical chapters the assessment is presented and reported in the following format:

- An Introductory Table - setting out the author of the technical topic assessment, identification of relevant appendices, key topic related considerations and consultation as part of the EIA Scoping Report / Opinion;
- Assessment Methodology – an explanation of the approach to defining the baseline conditions and assessment scenarios and evolved baseline conditions, the approach to undertaking the impact assessment (construction and operation, and any key assumptions made) and the definitions of the nature and scale of effect and what effects are deemed to be significant;
- Baseline Conditions – a description of the baseline conditions of the site and surrounding area (as relevant to the technical topic in question – may include / be based upon a future baseline);
- Receptors and Receptor Sensitivity – identification of the existing and introduced (new) receptors on the site and in the surrounding area that may be affected by the Proposed Development and identification of their sensitivity;
- Potential Effects – an assessment of the likely significant effects of the Proposed Development during enabling and construction and on completion, setting out the impacts and effects associated with each aspect of the assessment and an evaluation of their significance against defined criteria without the implementation of mitigation;
- Site Suitability – a description of site suitability assessments undertaken for the Proposed Development, included where relevant to the technical topic.
- Mitigation Measures, Monitoring and Residual Effects - a description of the mitigation measures that are being committed to and a summary of the residual effects of the Proposed Development;
- Climate Change – as relevant, an assessment of the likely significant effects of the Proposed Development when considering and in the context of potential for future climate change and taking into consideration the vulnerability of sensitive receptors to such change;
- Assessment of Future Environment – an assessment of the likely significant effects of the Proposed Development in relation to both an evolution of the baseline conditions and any in combination effects with the agreed committed development; and
- Likely Significant Effects – a short statement confirming which residual effects are considered to be significant.

ASSUMPTIONS AND LIMITATIONS

2.103 The principal assumptions that have been made, and any limitations that have been identified, in undertaking the EIA are set out below. Assumptions specifically relevant to each technical topic have been set out in each technical chapter of the ES:

- Baseline conditions have been established from a variety of sources, including historical data, but due to the dynamic nature of certain aspects of the environment, conditions at the site and surrounding land uses may change;
- It is assumed that information received from third parties is accurate, complete and up to date;
- The assessments contained within each of the technical assessment chapters of the ES (**ES Volume 1, Chapters: 6 - 13**) are based on the assumption that mitigation measures are implemented – as set out in application drawings, through regulatory regimes or via the management controls, within **ES Volume 1, Chapter 4: Proposed Development** and **ES Volume 1, Chapter 5: Enabling and Construction**, as well as the mitigation and monitoring measures outlined within **ES Volume 1, Chapter 14: Mitigation and Monitoring**;
- Enabling and construction works across the site would take place substantially in accordance with the programme of works described in **ES Volume 1, Chapter 5: Enabling and Construction**;
- The aim of the EIA is not to assess the Proposed Development's compliance / performance against planning policy, as this is considered within the Planning Statement that accompanies the planning application. Instead reference is made to relevant national, regional and local policy and guidance to

inform the scope of the assessment, the assessment methodologies applied, and the existence of any sensitive receptors to be considered;

- Where detailed information has not been available, reasonable assumptions have been made, and have been clearly set out, based on the professional experience of the author of the ES Chapter based on other developments of similar type and scale, to enable assessment of likely significant effects; and
- Committed developments identified are assumed to be implemented in accordance with the information that is publicly available and subject to the same regulatory regimes and good practice management controls as identified for the Proposed Development.