

## **Summary of Impacts**

### **Submitted on Behalf of NSC**

1. BAL sent through a table at 15:27 on the 4<sup>th</sup> October 2021 which NSC considers to be inappropriate for the exercise requested to be undertaken. This is not least because it did not capture the ability to identify neutral considerations. It also sought views on significance of impact as opposed to the weight to be ascribed to a factor in the planning balance which was asked for by the Panel.
2. In any event, NSC is concerned that this exercise of reducing the factors to be weighed into a summary form risks the decision making process becoming overly simplistic. It fails to capture the nuances of the balancing exercise that it is necessary to undertake. It also fails to apply the correct test required by section 38(6) of the Planning and Compulsory Purchase Act 2004.
3. Accordingly, whilst this document has been produced to assist the Inspectors it is not intended to substitute in any way for the closing submissions submitted on behalf of NSC.
4. It is regrettable that an agreed way forward with BAL has not been identified but this has partly arisen due to time constraints and the result of the Council having to deliver its closing submissions a day earlier than had been originally identified. There simply has not been enough time to negotiate over the form of the exercise.
5. Under each subject area we have identified relevant planning considerations and sought to apply weight. The scale used is as follows from lowest to highest weight:
  - Limited if any weight
  - Some Weight
  - Moderate Weight
  - Significant Weight
  - Very Significant Weight
6. Where a factor does not weigh one way or the other in favour of either grant or refusal it has been identified as having no or neutral weight.

<b>Issue</b>	<b>Reason</b>	<b>Weight</b>
Climate Change	<p>Unlawful to grant consent as results in breach of Sections 1 and 4 of the Climate Change Act 2008. In the alternative, conflict with national aviation policy, the NPPF (in particular, the objectives in paragraphs 7 and 148), contrary to policy CS1 of the CS and the duties in the CCA 2008 (as amended).</p> <p>The application is premature</p>	<p><b>Unlawful to grant planning permission, alternatively very significant weight against the grant of planning permission</b></p> <p><b>Significant weight against the grant of planning permission.</b></p>
Noise	<p>Breach of the approach set out in APF section 3</p> <p>Widespread and significant adverse impacts and failure to mitigate in accordance with the NPPF</p> <p>Conflict with the APF, NPPF, CS3, CS23 and CS26 to ensure attainment of the 6CB target and net zero 2050.</p>	<b>Very significant weight against the grant of planning permission</b>
Air Quality	<p>Important risks to public health caused by proposed development which are not mitigated.</p> <p>Conflict with the national aviation policy, the NPPF and Policies CS3, CS23 and CS26 of the Core Strategy.</p>	<b>Significant weight against the grant of planning permission</b>
Health	<p>Significant adverse impacts upon health of those living around the airport who receive no demonstrable benefit from airport expansion.</p> <p>Conflict with national aviation policy and Policy CS26 of the Core Strategy.</p> <p>Not established that the net employment would be generated in the with development scenario compared to the without development scenario would offset the very significant adverse health effects of the proposed development.</p>	<p><b>Significant weight against the grant of planning permission</b></p> <p><b>Limited if any weight in favour of grant of planning permission</b></p>
Surface Access	Public transport mode share of 2.5% uplift is not ambitious.	<b>Very significant weight against the grant of planning permission</b>

	<p>Inadequate surface access infrastructure, giving rise to highway safety impacts and severe cumulative impacts at junctions.</p> <p>Failure to accord with national aviation policy, the NPPF and policies CS1, CS10 and CS23 of the Core Strategy.</p>	<b>Significant weight against the grant of planning permission</b>
Green Belt	<p>Claimed parking demand not demonstrated. Need for parking in the GB not justified.</p> <p>Harm by virtue of inappropriateness, harm to openness of the Green Belt and other harm which is not outweighed by other considerations contrary to NPPF and Core Strategy.</p>	<b>Significant weight against the grant of planning permission</b>
Landscape and Visual. Ecology, Land Quality, Surface Water and Flood Risk, Groundwater and Historic Environment	No benefits or residual adverse impacts.	<b>Neutral weight</b>
Benefits	<p>No demonstrable net business travel impact</p> <p>All aspects of the economic and other assessments which are dependent upon displacement – including any argument relating to clawback of trips, parking demand.</p> <p>In the alternative, displacement means that most of the economic benefits will occur in any event. In addition, Carbon costs must be taken into account meaning the NPV amounts to less than £10m a year over the year years it is</p>	<p><b>No weight</b></p> <p><b>Limited if any weight in favour of the grant of planning permission due to the absence of any scrutiny of the Logit model and the absence of any ability by a decision maker to determine its robustness. Unfairness would result with any other conclusion</b></p> <p><b>Some weight in favour of grant of planning permission.</b></p>

	<p>assessed meaning that the benefits of the proposed development are in the context of the area economically small.</p> <p>Grant of planning permission will be contrary to the levelling up agenda</p> <p>Outbound trips will cost the economy £123m a year and the social benefits of travel will arise even if planning permission is refused.</p> <p>No evidence on which it can be rationally concluded that the grant of planning permission would deliver any net material increase in connectivity on either a UK wide basis or indeed any other geographical basis if planning permission is granted compared to the position if planning permission is refused</p> <p>Regeneration of deprived areas – no evidence of material economic benefit arising from the mitigation proposed which seeks to encourage employment from deprived areas. No guarantee of any jobs actually arising from these areas</p>	<p><b>Significant weight against the grant of planning permission.</b></p> <p><b>Some weight against the grant of planning permission</b></p> <p><b>No weight</b></p> <p><b>limited if any weight</b></p>
APF and MBU	Overall balance means that the costs outweigh the benefits	<b>Very significant weight against the grant of planning permission</b>
Development Plan	Development does not accord with an up to date development plan in substantial respects	<b>Very significant weight against the grant of planning permission</b>