

## **2. Approach**

### **Introduction**

- 2.1 This chapter describes the methodology used to undertake the EIA in accordance with the Town and Country Planning (Environmental Impact Assessment) Regulations 2017 (SI 2017/571) as amended and National Planning Practice Guidance ('NPPG').
- 2.2 The chapter begins with a description of the general approach to assessment and EIA regulatory compliance, including how the planning application and EIA are linked. EIA procedure and methodology is presented before the spatial and temporal scope of the assessment is discussed.
- 2.3 Following this, the criteria used for impact prediction, assessing significance and implementing and securing mitigation measures are explained, along with any limitations and assumptions. With regard to the methodologies and assumptions for the technical assessments, each chapter has its own specific assessment methodology and assumptions, which are explained within the relevant sections.
- 2.4 A wide range of experience, resources and skills have been coordinated in order to bring together this application and the project team, along with their professional roles, is presented at the end of this chapter.

### **EIA Procedure and Methodology**

#### **EIA and Regulatory Compliance**

- 2.5 The EIA Regulations, supported by precedents in UK case law, have established the legal framework for the process of EIA and contents of Environmental Statements. The application is to be submitted as a full planning application. The description of development and plans provides sufficient detail to identify, predict and assess the significance of any potential environmental effects.

## **EIA Parameters**

- 2.5 The planning application is accompanied by a suite of detailed plans for the detailed elements of the application. These plans, alongside with the written description of the proposed development set out in Chapter 5: The Proposed Development, identify the development to be assessed for the purposes of the EIA process.

## **Basis of Assessment**

- 2.6 The EIA is based on the written description of the Proposed Development including construction timescales and detailed plans, the Site red line application boundary and the quantum of development (see: Chapter 5: The Proposed Development). The description of development, along with detailed plans submitted for approval as part of the application, allow the likely significant effects of the proposals to be fully assessed and appropriate mitigation measures secured. The development of the site will be carried out in a series of phases based over a c.10 year build out. The overall effects within this ES are presented assuming simultaneous build out to represent a 'worst case' scenario for assessment purposes.
- 2.7 The Design and Access Statement (DAS) which accompanies the planning application, presents further information about the Proposed Development.

## **Screening**

- 2.8 The EIA Regulations require that for certain planning applications, an EIA must be undertaken. Schedule 1 of the EIA Regulations lists developments that always require EIA and Schedule 2 of the EIA Regulations list developments that may require EIA if it is considered that they could give rise to significant environmental impacts.
- 2.9 Regulation 6 of the EIA Regulations makes provision for a developer to request a 'Screening Opinion' from the Local Planning Authority (LPA) to ascertain whether an EIA is required if a development is classed as a Schedule 2 development. This decision is based on the likelihood of significant environmental effects arising in relation to the development proposals. Due to the scale and location of the Proposed Development, it has been assumed for the purposes of the application that a statutory EIA will be required and therefore the Applicant has undertaken an EIA in

respect of the proposals without seeking a Screening Opinion from the Local Authority.

## **EIA Scoping**

2.10 Scoping is a process that, through research and consultation, identifies the environmental issues that require assessment as part of the EIA. This essentially refines the focus of the EIA on the environmental aspects which are likely to result in significant environmental impacts whilst also ensuring that no potentially significant areas are overlooked.

2.11 A formal scoping process was undertaken and the scoping Opinion Ref: 22/00572/SO is attached as Appendix 2.1.

2.12 The scoping process concluded that there were potentially significant environmental effects in relation to the below topics and that these should be included in the EIA:

- Traffic and Transport;
- Air Quality;
- Noise and Vibration;
- Heritage;
- Contaminated Land;
- Climate Change; and
- Ecology

2.13 A number of other topics were scoped out of the EIA and identified as potentially giving rise to impacts that will be not significant. These topics included:

- Wind Microclimate;
- Daylight, Sunlight and Overshadowing;
- Waste Management;
- Socioeconomics;
- Water Resources;
- Human Health; and

- Accidents and Disasters.

## **Consultation**

- 2.14 An integral part of the EIA process is consultation with a range of statutory and non-statutory consultees. Consultation was undertaken at the scoping stage to identify at an early stage any initial environmental concerns associated with the Proposed Development that required examination in greater detail in the EIA. The EIA has been prepared based on pre-application discussions with KMBC, the scoping opinion and advice from the technical experts advising the Applicant to prepare the planning application.
- 2.15 Consultation has been undertaken as part of the technical assessments as a means of establishing the environmental baseline and assessment methodologies. This includes identifying sensitive components of the environment, e.g. humans, organisms or physical characteristics, or potential effects and reaching consensus on suitable mitigation measures. Details of further consultation undertaken as part of each technical assessment will be described further within each technical chapter as relevant at final submission.

## **Pre-Application Discussions**

- 2.16 Consultants acting on behalf of the Applicant have engaged with KMBC and relevant statutory and regulatory bodies as part of an extensive pre-application discussions exercise. Pre-application liaison between the professional team and KMBC has taken place where a range of technical and design issues have been discussed.
- 2.18 The proposals have been subject to a period of Public Consultation which took place in both September and October 2022. These had been undertaken via three in-person consultations events at Unit 3, St Chads Parade and Kirkby Town Centre. A leaflet drop was undertaken for residents and businesses within the vicinity of the site.
- 2.19 The consultation information included the plans presenting the evolution of the design approach at that stage, which had been informed and influenced by the pre-application discussions with KMBC. Consultation feedback is reported through the

accompanying Statement of Community Involvement, with comments covering a range of issues and concerns.

## **EIA Methodology**

- 2.20 In addition to observing the formal requirements of the EIA Regulations, further formal guidance has been drawn from National Planning Practice Guidance (NPPG). Specific technical guidance is referenced in the individual technical chapters as appropriate.

## **Consistency**

- 2.21 To assist the reader in understanding the technical assessments a consistent approach has been adopted throughout the EIA to ensure that likely significant effects are identified and evaluated in a transparent manner.

## **Spatial and Temporal Scope of Assessment**

- 2.22 The spatial extent of the EIA is described by the geographical area potentially affected by the proposed scheme and will need to take into account:
- The physical extent of the proposed scheme defined by the limits of land to be used in operation (temporary and permanent);
  - The position of sensitive receptors within or outside of the Site boundaries; and
  - The nature of the baseline environment and the way in which the impacts are likely to be propagated.
- 2.23 The effects for each of the disciplines are likely to extend to different spatial extents. The spatial scope for each discipline will be described within each of the topic chapters as required.
- 2.24 The environmental baseline studies undertaken as part of the EIA consider the current conditions of the Site. Therefore, each technical chapter will contain a description of the relevant study area that may be affected by the scheme.

2.25 With reference to the baseline conditions, the impact assessment will be made against existing baseline conditions. The assessment will address effects arising from the operation of the proposed scheme as follows:

- Construction effects may arise directly from construction activities but also from the temporary use of land (e.g. construction sites) or from associated changes in traffic movements; and
- Operational effects may arise from the permanent operational activities and ongoing use of the Proposed Development, including but not limited to highways, and air quality.

2.26 The significance of the effects that will arise is based on any changes compared to the baseline conditions (i.e. those conditions which would exist if the proposed scheme did not go ahead).

## Impact Prediction

2.27 The 2017 EIA Regulations state that an ES should include:

*"A description of the likely significant effects of the development on the environment resulting from inter alia:*

- *The construction and existence of the development, including, where relevant, demolition works;*
- *the use of natural resources, in particular land, soil, water and biodiversity, considering as far as possible the sustainable availability of these resources;*
- *the emission of pollutants, noise, vibration, light, heat and radiation the creation of nuisances, and the disposal and recovery of waste;*
- *The risk to human health, cultural heritage or environment (for example accidents and disasters);*
- *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;*
- *The impact of the project on climate (for example nature and magnitude of greenhouse gas emissions) and the vulnerability of the project to climate change;*

- *The technologies and substances used."*

2.28 Predictions of environmental impacts are carried out using quantitative methods, or in some cases, qualitative terms using expert opinion. All assumptions used and any areas of uncertainty are defined in the relevant chapters.

2.29 The following types of effect are considered:

- Direct impacts that arise from activities that form an integral part of the proposed scheme (e.g. new infrastructure/land take);
- Indirect impacts that arise from activities not explicitly forming part of the proposed scheme (e.g. noise changes due to changes in road traffic flows on existing roads resulting from the operation of the scheme);
- Secondary impacts that arise as a result of an initial effect of the proposed scheme;
- Permanent impacts that result from an irreversible change to the baseline environment (e.g. land take) or impacts which persist for the foreseeable future (e.g. visual impact);
- Temporary impacts that persist for a limited period only;
- Beneficial impacts that have a positive influence; and
- Adverse impacts that have a negative influence.

## Significance Criteria

2.30 The significance of effect is assessed by looking at what the changes will be against the existing or predicted baseline as a result of the operation of the scheme. It is a product of the sensitivity of the receptor, and the magnitude of the impact upon it. The criteria used to define the sensitivity of a receptor and magnitude of impact is provided in Table 2.2 and Table 2.3 below. These criteria are used as a guide only and the specific criteria for each technical assessment will be presented within each chapter.

Table 2.2: Description of the Sensitivity of an Environmental Receptor

| Sensitivity | Typical descriptors                                                                               |
|-------------|---------------------------------------------------------------------------------------------------|
| Very High   | Very high importance and rarity, international scale and very limited potential for substitution. |
| High        | High importance and rarity, national scale, and limited potential for substitution.               |
| Medium      | High or medium importance and rarity, regional scale, limited potential for substitution.         |
| Low         | Low or medium importance and rarity, local scale.                                                 |
| Negligible  | Very low importance and rarity, local scale.                                                      |

2.31 Descriptions of the magnitude of impact are provided in Table 2.3 below.

Table 2.3: Description of the Magnitude of an Impact

| Magnitude of Impact | Impact Type | Typical criteria descriptors                                                                                                                                           |
|---------------------|-------------|------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| Very Large          | Adverse     | Loss of resource and/or quality and integrity of resource; severe damage to key characteristics, features or elements                                                  |
|                     | Beneficial  | Large scale or major improvement of resource quality; extensive restoration or enhancement; major improvement of attribute quality                                     |
| Large               | Adverse     | Loss of resource, but not adversely affecting the integrity; partial loss of/damage to key characteristics, features or elements                                       |
|                     | Beneficial  | Benefit to, or addition of, key characteristics, features or elements; improvement of attribute quality                                                                |
| Medium              | Adverse     | Some measurable change in attributes, quality or vulnerability; minor loss of, or alteration to, one (maybe more) key characteristics, features or elements            |
|                     | Beneficial  | Minor benefit to, or addition of, one (maybe more) key characteristics, features or elements; some beneficial impact on attribute or a reduced risk of negative impact |

| Magnitude of Impact | Impact Type | Typical criteria descriptors                                                                       |
|---------------------|-------------|----------------------------------------------------------------------------------------------------|
|                     |             | occurring                                                                                          |
| Small               | Adverse     | Very minor loss or detrimental alteration to one or more characteristics, features or elements     |
|                     | Beneficial  | Very minor benefit to or positive addition of one or more characteristics, features or elements    |
| No change           | n/a         | No loss or alteration of characteristics, features or elements; no observable in either direction. |

## Identification of Significant Effects

2.32 Based on the sensitivity and magnitude criteria set out above, specific significance criteria have been used in each technical assessment and these are explained in the methodology sections within each technical chapter. Often, these are based on clearly defined criteria from published best practice guidance. However, wherever possible, the following terminology has been utilised:

- Major Beneficial;
- Moderate Beneficial;
- Minor Beneficial;
- Negligible;
- Minor Adverse;
- Moderate Adverse; and
- Major Adverse.

2.33 Where potential environmental impacts have been found, further to assessment which are of no significance, they are said to have no effect.

2.34 The assessment of likely significant effects has been undertaken for all potential effects to determine their relative importance. This has taken into account the following considerations:

- Magnitude (size of impact);
- Sensitivity of the surrounding environment and receptors;
- Spatial extent (size of the area affected);
- Duration (short, medium or long term);

- Nature of the effect (direct or indirect, reversible or irreversible);
- Inter-relationships and combination effects;
- International, national or local standards; and
- Relevant policy guidance.

## Mitigation

2.35 The development of measures designed to avoid, reduce or offset significant adverse environmental effects associated with a proposal is one of the key elements of EIA. Measures to mitigate environmental effects of the Proposed Development can take two forms;

- Embedded mitigation - is the consideration of mitigation embedded into the fixed scheme with the aim where possible, of avoiding, reducing or offsetting significant adverse effects, determined during the course of the assessment; and
- Further mitigation – is the mitigation that is not embedded into the proposals and which requires further action than already proposed.

2.36 Where environmental mitigation measures have not been integrated into the proposals through design, it is expected that all other requisite measures or ‘further mitigation’ will be secured by appropriate planning conditions or obligations. Each technical chapter of the EIA will describe the relevant mitigation measures.

## Cumulative Effects

2.37 In line with Schedule 4 Paragraph 5(e) of the EIA Regulations, an ES must provide a description of the likely significant effects of a project on the environment resulting from:

*“...the culmination of effects with other existing and / or approved projects...”*

2.38 Such effects are known as ‘cumulative effects’.

2.39 Given that existing development will be considered in the environmental baseline conditions relevant to the Site and the development, and a consideration of the likelihood of significant environmental effects of the development are judged against the relevant environmental baseline conditions, the potential for cumulative effects focuses as a minimum on those developments with:

- A resolution to grant planning permission.
- A valid planning permission and yet to start on-site.
- A valid planning permission and under construction.

2.40 These are referred hereafter as 'committed developments'.

2.41 The assessment of cumulative effects is set out in two forms. The first relate to the impacts of the Proposed Development in conjunction with committed developments in the area. These committed developments should be located within a realistic geographical scope where environmental effects could combine to create a more significant effect on a particular sensitive receptor. The second type of cumulative effect is that of the combination of the various types of impacts from the Proposed Development. These are referred to as synergistic effects.

2.42 Committed developments for consideration in the cumulative effects assessment were identified through a planning application search of the KMBC planning portal and through the EIA scoping process.

| Site Ref. | Application No. | Distance and Direction | Proposal                                         |
|-----------|-----------------|------------------------|--------------------------------------------------|
| 1.        | 20/00193/FUL    | 500m southwest         | 266no. Residential dwellings                     |
| 2.        | 20/00124/FUL    | 2km northeast          | Erection of B8 Warehouse and distribution centre |
| 3.        | 19/00337/OUT    | 1.5km northeast        | Industrial led mixed use development             |

## **Limitations and Assumptions**

- 2.43 The EIA has been undertaken based on the planning application drawings and description of the development submitted with the planning application. The technical assessments have been based on the current land uses and the existing baseline conditions at the Site. Any assumptions made or limitations relating to individual technical assessments are presented, where applicable, in the relevant technical chapters.

## **The Project Team**

- 2.44 The ES has been compiled using a wide range of sources and with inputs from competent, technical specialists. The 2017 EIA Regulations require that an ES is prepared by competent experts and include a statement of the relevant expertise of the technical experts inputting into an EIA. The project team which has prepared and inputted into this ES is presented in Table 2.4.

**Table 2.4 Technical Team**

| Discipline            | Company                      | Personnel Profile                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                    |
|-----------------------|------------------------------|--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| Traffic and Transport | Mode                         | <p><b>Michael Anthony MCIHT</b></p> <p>Michael Anthony is associate at mode transport planning based in Manchester. Michael has a wide range of experience working on development schemes across the UK, within the residential, commercial, leisure and industrial sectors. He has an excellent record in securing planning consent for clients, as well as delivering cost effective transport and highways solutions.</p> <p>Michael has solid experience of the planning process and expertise in preparing planning application documents including Transport Assessments, Travel Plans and Traffic Impact Assessments (LinSig, VISSIM, ARCADY and PICADY). He has considerable experience of liaising with highway authorities and ensuring compliance with the relevant transport planning policies and design standards.</p> |
| Air Quality and Dust  | Air and Acoustic Consultants | <p><b>Simon Grubb</b></p> <p>Simon Grub is director at Air and Acoustics, he has worked in the environmental sector for the past 12 years. Simon has experience working in the planning industry conducting both noise and air quality assessments for the production of EIAs and technical chapters to be used to support a range of planning schemes. Simon has experience conducting works for both the private and public sector for a range of developments in doing so support developments and applications.</p>                                                                                                                                                                                                                                                                                                              |

| Discipline          | Company           | Personnel Profile                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                      |
|---------------------|-------------------|--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| Noise and Vibration | Noise Consultants | <p><b>David Sproston (Principal Consultant) BSc (Hons) MIOA MCIEH</b></p> <p>The noise and vibration work is led by David Sproston, NCL's Principal Consultant with more than 16 years' experience in the measurement, prediction and assessment of acoustics, noise and vibration. David is a Corporate Member (MIOA), and sits on the Publications Committee of the Institute of Acoustics and is also a full Member of the Chartered Institute of Environmental Health (MCIEH). David has extensive experience of consultation with, and work for Public and Private sector clients, in securing planning permissions for a wide range of developments including residential and large residential-led mixed use developments, industrial, commercial, education, healthcare and mineral sites.</p> |
| Heritage            | Turley            | <p><b>Kerrie Melrose (BSc, MSc, RTPI, IHBC)</b></p> <p>Kerrie Melrose has 14 years' experience in built heritage across the public, private and charitable sectors. She is a full member of both the RTPI and IHBC. Since joining Turley in 2014, Kerrie has worked on a wide range of development projects across the UK preparing heritage appraisals, statements of significance, historic and architectural research, heritage statements and EIA scoping, ES chapters and technical appendices. Kerrie leads built heritage input on complex development projects including urban regeneration and greenbelt development and site allocation, requiring liaison across technical disciplines, with local authorities and statutory consultees.</p>                                                |

| Discipline        | Company | Personnel Profile                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                    |
|-------------------|---------|----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| Contaminated Land | E3P     | <p><b>Rebecca Hodnett BSc</b></p> <p>Miss Rebecca Hodnett is a Principal Geoenvironmental Consultant at E3P, with 6.5 years' experience in the field. Her current role involves project management and design of site investigation and remediation works, as well as general management of consultancy operations and support to both junior and senior members of staff.</p> <p>As a Principal Geoenvironmental Consultant at E3P, Rebecca's main responsibilities include liaison (contractors, clients, regulatory authorities and local councils), undertaking and reviewing Phase I environmental site assessments; the design and completion of Phase II site investigations, remediation and enabling works strategies, and validation procedures; coal mining and permeability assessments. Works include assessments for both public and private entities for residential and commercial developments.</p> |
| Climate Change    | WATT    | <p><b>Daniel Watt</b></p> <p>Daniel is founding director of Watt Energy &amp; Consulting Engineers with a demonstrated history of working in the construction industry. His expertise is in MEP Design Engineering, Design Management, High-rise residential &amp; commercial Buildings, Feasibility Studies, and Energy Efficiency. Daniel has an excellent reputation for delivering innovative and cost-effective Low Carbon mechanical and electrical design packages across a broad range of public and private sectors in EIAs and technical chapters.</p>                                                                                                                                                                                                                                                                                                                                                     |

| Discipline       | Company | Personnel Profile                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                 |
|------------------|---------|---------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| Ecology          | ERAP    | <p><b>Victoria Burrows B.Sc. (Hons) M.Sc. CEnv MCIEEM</b></p> <p>ERAP (Consultant Ecologists) Ltd is an established consultancy specialising in the survey and assessment of habitats, protected species and other wildlife and biodiversity.</p> <p>ERAP (Consultant Ecologists) Ltd has carried out the relevant scope of ecological survey for a range of projects including the preparation of Environmental Impact Assessment (EIA) chapters for the assessment of large housebuilding schemes, commercial business parks and mixed-use development.</p> <p>The ecological surveys and report preparation have been completed and overseen by Victoria Burrows B.Sc. (Hons) M.Sc. CEnv MCIEEM, Principal Ecologist and Director of ERAP (Consultant Ecologists) Ltd who has over 21 years of experience. Surveys have been carried out by appropriately qualified, licensed and experienced ecologists, who are members of the Chartered Institute of Ecology and Environmental Management (CIEEM). The reporting is in accordance with current industry standards as provided by CIEEM.</p> |
| EIA Coordinators | Egniol  | <p><b>Richard Kevan (Environmental Services Director) BA, MSc, MRTPI, REIA, PIEMA</b></p> <p>Richard has practiced for 18 years in the private sector working on various projects throughout the UK. He has a wealth of experience in providing planning and Environmental Impact Assessment advice and delivering planning permissions to both private and public sector clients on a range of</p>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                               |

| Discipline | Company | Personnel Profile                                                                                                                                                                                       |
|------------|---------|---------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
|            |         | high-profile regeneration projects. He is experienced in all aspects of planning and EIA work, with a particular specialism in complex mixed use, residential, commercial, waste and minerals projects. |