

2 EIA METHODOLOGY

2.1 INTRODUCTION

This chapter sets out:

- the stages of the EIA that have been undertaken;
- the issues that have been ‘scoped in’ and ‘scoped out’ of consideration in this ES through consultation with Liverpool City Council (LCC) and other consultees;
- the format of the ES technical chapters; and
- the methodology that has been used to assess the significance of effects associated with the scheme.

2.2 EIA APPROACH

This ES has been prepared in accordance with the EIA Regulations 2011 as amended [1] [2], which implement Council Directive 2011/92/EU on the assessment of the effects of certain public and private projects on the environment.

2.3 SCREENING

Screening is the first stage of the EIA process. It establishes if a development is ‘EIA development’ and whether the planning application therefore needs to be accompanied by an ES.

As set out in Chapter 1: Introduction of this ES, the Club has chosen to voluntarily submit an ES in accordance with Part 2, 4.(2) (a) of the EIA Regulations 2011 given the location of the site and sensitivity of the surrounding area. A request for a screening opinion was not submitted to LCC under Regulation 5(1) of the EIA Regulations 2011 [1] [3].

2.4 SCOPING

2.4.1 The Intended Focus of EIA

EIA is a process that should be focussed on the likely significant environmental effects of a proposed development. It is not intended to be a process to address all the possible environmental effects. One of the main criticisms of current EIA practice is that the scope is often drawn too widely, which results in ES documents that are unnecessarily long and are less useful for their intended purpose, i.e. to act as a decision-making tool.

“At its best, EIA helps to shape the design and siting of development such that social value to communities and broader economic value to investors can both be met, without eroding natural capital and pushing the boundaries of environmental limits – a tool that can truly support moves towards sustainability. However, the many competing demands can often serve to stifle the process, resulting in reams of information that mask the key environmental issues that need to be considered.” [4]

2.4.2 Request for a Scoping Opinion

Scoping is an important, though optional, exercise undertaken throughout the early stages of the EIA process. Its purpose is to focus the EIA and

resultant ES on key issues and to avoid the unnecessarily complicated examination of minor issues. In practice, the process involves determining the information that needs to be included in the ES through consultation with the competent authority, statutory consultees and other stakeholders.

A request for a scoping opinion (‘Scoping Report’) was compiled and submitted to LCC on 25 May 2017.

Based on an initial evaluation process, the Scoping Report proposed that those topics listed in Table 2.1 were to be ‘scoped in’, this was a long list of topics as it was noted that such topics needed further assessment work to establish whether they were likely to have significant effects.

Following further assessment, those topics where significant environmental effects were considered likely would be included for detailed consideration within a stand-alone technical chapter in the main volume of the ES. If it was identified that they were not likely to result in significant effects, they would be ‘scoped down’.

Scoped down topics are those where significant environmental effects are considered unlikely, but further assessment is required to satisfy planning requirements, these would be included within the ES technical appendices but would not merit the preparation of a stand-alone technical chapter within the main volume.

Last, a single topic – Waste – was proposed to be ‘scoped out’. This was because it was considered that further assessment beyond the scoping stage was not necessary as it was unlikely that this topic would exhibit significant environmental effects and would be addressed in other planning application documents, in this instance the design and access statement.

Table 2.1
Proposed Approach to Topics Scope of the ES

SCOPED IN	SCOPED OUT
Socio-Economics	Waste
Ground Conditions	
Water	
Biodiversity	
Townscape & Visual	
Archaeology & Heritage	
Transport	
Air Quality	
Noise & Vibration	
Daylight, Sunlight & Overshadowing	
Wind	

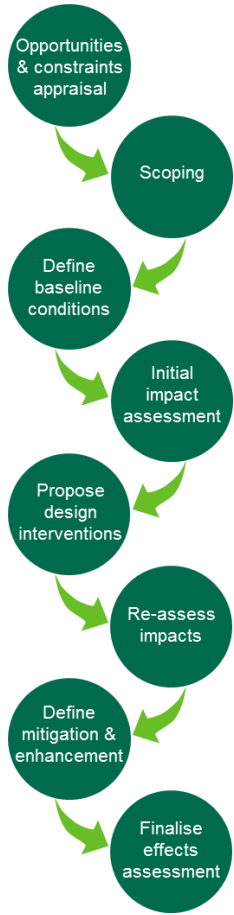
The EIA Scoping Report is included as Appendix 2.1, ES Volume IV.

2.4.3 Adopted Scoping Opinion and Summary of Consultation Responses

The Scoping Report was circulated by LCC to a range of internal and external consultees. On 21 June 2017, LCC issued their Scoping Opinion, alongside the consultee responses. The Scoping Opinion and supporting documents are provided in Appendix 2.2, ES Volume III.

Ongoing dialogue has been maintained within LCC and the various statutory consultees during the subsequent design development and environmental assessment processes. This has formed a feedback loop so that where potential adverse environmental effects have been identified the design has been amended to seek to avoid or reduce such effects. This process is illustrated in Figure 2.1.

Figure 2.1
Iterative EIA Approach including Design Interventions



The scoping consultation responses are summarised in Table 2.2, which also indicate where these issues have been considered within the ES.

Consequently, a number of technical topics have been identified as not likely to result in significant environmental effects and have therefore been ‘scoped down’, these include:

- Biodiversity;

EIA METHODOLOGY

- Wind; and
- Archaeology.

2.4.3.1 Biodiversity

An Ecological Assessment, Ecological Appraisal, and Report to Inform Habitat Regulations Assessment Stage 1 have been undertaken and are provided at Appendix 3.2, Vol III of this ES. No significant effects have been anticipated and as such a technical chapter has not been included.

2.4.3.2 Wind

Significant effects on wind microclimate are principally associated with proposals that include tall buildings or where proposals relate to an environment where tall buildings are already present.

Given that the surrounding buildings are generally low rise and the existing stadium has a maximum height of approximately 26mAOD, it was identified in the Scoping Report that should the proposed development at the site not exceed approximately 12 storeys in height (circa 37.6mAOD), significant wind impacts on the pedestrian environment would be unlikely.

The proposed development does not exceed 22mAGL and therefore is considered unlikely to result in significant environmental effects. Consequently, a specific pedestrian wind assessment has not been undertaken.

2.4.3.3 Archaeology

An Archaeological Desk Base Assessment has been undertaken and is provided in ES Volume III, Appendix 3.1, it states that the scheme is not expected to have any material archaeological effects.

EIA METHODOLOGY

Table 2.2
Summary of Scoping Consultation Responses

CONSULTEE / COMMENT	WHERE ADDRESSED
Environment Agency (EA) (21 st June 2017)	
<i>EA agree with the proposed scope with regards to matters within their remit. In this instance their principle concern would be impacts to controlled waters. Having considered the report EA tentatively agree the likelihood for land contamination is low but the proposed development would be located above a Principle Aquifer which is considered a sensitive receptor.</i>	ES Volume II, Chapters 13 and 14; and ES Volume III, Appendices 13.1 and 14.1
<i>EA agree with the recommendation to include a section/chapter on Ground Conditions in the EIA report. Any proposal to develop this site will need to be accompanied by an assessment of the impacts of development upon hydrogeology of the area. This will need to address both existing contamination which may be present and impacts that the future ongoing operation of the site will have on the groundwater environment.</i>	ES Volume II, Chapter 13; and ES Volume III, Appendix 13.1
<i>The applicant/ developer should refer to our groundwater protection guidance and our groundwater protection position statements, that can be found at:</i> https://www.gov.uk/government/collections/groundwater-protection <i>the guidance sets out our position for a wide range of activities and developments including waste management, land contamination, discharge of liquid effluents and drainage.</i>	ES Volume II, Chapters 13 and 14; and ES Volume III, Appendices 13.1 and 14.1
<i>All investigations of land potentially affected by contamination should be carried out by or under the direction of suitably qualified competent person and in accordance with BS 10175 (2001) Code of practice for the investigation of potentially contaminated sites. The competent person would normally be expected to be chartered member of an appropriate body (such as the Institution of Civil Engineers, Geological Society of London, Royal Institution of Chartered Surveyors, Institution of Environmental Management) and also have relevant experience of investigating contaminated sites. The Specialist in Land Condition (SiLC) qualification administered by the Institution of Environmental management provides an accredited status for those responsible for signing off LCR's. for further information see- www.silc.org.uk</i>	N/A
Historic England (HE) (15 th June 2017)	
<i>Development on this site could, potentially have an impact upon number of designated heritage assets and their settings in the area around the site. in line with the advice in the National Planning Policy Framework (NPPF), Historic England would expect the ES to contain a thorough assessment of the likely effects which the proposed development might have upon these elements which contribute to the significance of these assets.</i>	ES Volume II, Chapter 12; and ES Volume III, Appendix 12.1
<i>Historic England's initial assessment shows a number of designated heritage assets within the proximity of the proposed development. HE would draw our attention, in particular to the following:</i> <ul style="list-style-type: none">■ <i>Anfield Cemetery (Grade II* Registered Historic Park and Garden)</i>■ <i>Stanley Park (Grade II* Registered Historic Park and Garden)</i>■ <i>North and South Catacombs, Anfield Cemetery (both Grade II)</i>■ <i>Conservatory Stanley Park (Grade II)</i>	ES Volume II, Chapter 12; and ES Volume III, Appendix 12.1
<i>An ES should also consider the potential impacts on non-designated features of historic, architectural, archaeological or artistic interest, since these can also be national importance and make an important contribution to the character and local distinctiveness of an area and its sense of place.</i>	ES Volume II, Chapter 12; and ES Volume III, Appendices 3.1 and 12.1
<i>Historic England recommend that the Conservation Officer of Liverpool City Council and the archaeological staff at Merseyside Environmental Advisory Service (MEAS) in the development of this assessment. They are best placed to advise on: local historic environment issues and priorities; how the proposal can be tailored to avoid and minimise potential adverse impacts on the historic; the nature and design of any required mitigation measures; and opportunities for securing wider benefits for the future conservation and management of heritage assets.</i>	ES Volume II, Chapter 12; and ES Volume III, Appendices 3.1 and 12.1
<i>Given the height of the structures associated with the proposed development and the surrounding landscape character, this development is likely to be visible across a very large area and could, as a result affect the significance of heritage assets at some distance from this site itself. HE would expect the assessment to clearly demonstrate that the extent of the proposed study area is of appropriate size to ensure that all heritage assets likely to be affected by this development have been included and can be properly assessed.</i>	ES Volume II, Chapter 12; and ES Volume III, Appendix 12.1
<i>It is important that the assessment is designed to ensure that all impacts are fully understood. Section drawings and techniques such as photomontages are useful part of this.</i>	ES Volume III, Appendix 11.1 and Design & Access Statement Addendum
<i>The assessment should also take account of the potential impact which associated activities (such as construction, servicing and maintenance and associated traffic) might have upon perceptions, understanding and appreciation of heritage assets in the area. The assessment should also consider, where appropriate, the likelihood of alterations to drainage patterns that might lead to in situ decomposition or destruction of below ground archaeological remains and deposits and can also lead subsidence of buildings and monuments.</i>	ES Volume II, Chapter 12; and ES Volume III, Appendices 3.1 and 12.1
<i>HE welcomes that Archaeology and Built Heritage have been considered as part of the scoping document, but are concerned that section 6.6 doesn't not commit to the production of a Built Heritage chapter within the main volume of ES. He recommends that Built Heritage is explicitly considered, given the site's close proximity to a number of highly grade assets.</i>	ES Volume II, Chapter 12

EIA METHODOLOGY

CONSULTEE / COMMENT	WHERE ADDRESSED
<i>Anfield Cemetery and Stanley Park are both incorrectly identified as GII* listed buildings within the scoping report. These landscapes are GII* Registered Historic Parks and Gardens which are formally designated assets, as defined I NPPF, which contain a number of separately listed buildings, including bridges and catacombs. It is imperative that the distinction between these designations is fully understood in the production of the ES.</i>	This error has been rectified in this Chapter and the Heritage Statement (ES Volume III, Appendix 12.1). The two assets are Grade II* Registered Historic Parks & Gardens, which both contain a number of separately listed buildings.
<i>Reference as also made to ‘local built heritage assets’ but is unclear how these are defined. Are they undesignated heritage assets, as defined in the NPPF or are they national designated assets that are found in the local area? It would be helpful if the terminology used in the report aligned with that of the NPPF, in order to provide clarity to the document.</i>	For the purposes of the ES and the Heritage Statement (ES Volume III, Appendix 12.1) local built heritage assets are defined as non-designated heritage assets as identified on the Merseyside Historic Environment Record.
<i>Chapter 6.6 of the scoping report sets out that an assessment of impacts on the setting of built heritage assets will be drawing upon Accurate Visual Representations (AVRs). For the avoidance of doubt, consideration also needs to be given to the impact of the setting on the grade II* Registered Park and gardens, Anfield Cemetery and Stanley Park, and reference should be made to our document Good Practice Advice Note: The setting of Heritage Assets (GPA3)- https://content.historicengland.org.uk/images-books/publications/gpa3-setting-ofheritage-assets/gpa3.pdf/.</i>	ES Volume II, Chapter 12; and ES Volume III, Appendix 12.1
<i>HE can further advise, that due to the high grade of Anfield Cemetery and Stanley Park, they should be considered as sensitive receptors in the noise, air quality and overshadowing chapters.</i>	ES Volume II, Chapters 8, 9 and 10; and ES Volume III, Appendices 8.1 and 9.1
<i>The document correctly identifies that the site is situated within 2.2km of Liverpool Maritime Mercantile World Heritage Site (WHS) but does not specify whether this asset is to be considered as a potential receptor within this ES. If the WHS is to be considered, the potential impact should be analysed in the form of a Heritage Impact Assessment (HIA), with the main findings incorporated into the body of the ES.</i>	The WHS has not been identified as a sensitive receptor due to its distance from the site (approximately 2km) and the lack of intervisibility between the proposals and the WHS.
<i>The HIA should comply with the guidance set out in appendix four of the ICOMOS Guidance on Heritage Impact Assessments for Cultural World Heritage Properties and be included in full, as technical appendix of the ES.</i>	
<i>Goodison Park is often cited as one of the oldest purpose-built football grounds in the country. It therefore has historic, architectural and communal significance, which should be explored, and placed in a national context, as part of the ES process. Historic England documents, Conservation Principles https://content.historicengland.org.uk/images-books/publications/conservationprinciples-sustainable-management-historicenvironment/conservationprinciplespoliciesguidanceapr08web.pdf/ and Principles of Selection - Sports and Recreation https://content.historicengland.org.uk/imagesbooks/publications/dlsg-sports-recreation-buildings/sports_and_recreation_final.pdf/, would be useful references.</i>	ES Volume II, Chapter 12; and ES Volume III, Appendix 12.1
Merseyside Environmental Advisory Service (23rd June 2017)	
<i><u>Archaeology</u></i> <i>There are no heritage assets recorded on the Merseyside Historic Environment Record (MHHER) as lying within the proposed development site.</i> <i>The proposal to undertake a Heritage Assessment, to be included in the ES appendices is however considered to be an appropriate starting point and is welcomed.</i>	ES Volume III, Appendix 3.1
<i><u>Ecology and Habitats Regulations</u></i> <i>The applicant has submitted and EIA Scoping Report which includes the proposed scope of the Preliminary Ecological Appraisal.</i>	ES Volume III, Appendix 3.2
<i>The proposed scope of the EIA in relation to biodiversity is acceptable and recognises the following potential effects of the proposals, during construction and after completion of works on site:</i> <ul style="list-style-type: none">■ Temporary and permanent land take;■ Disturbance (visual, noise, lighting)■ Pollution (dust generation, pollution of aquatic habitats);■ Construction site hazards;■ Anthropogenic/ urban effects (including recreational pressure, disturbance and traffic);■ Air quality impacts;■ Pollution of water resources; and■ Permanent lighting. <i>The proposed Preliminary Ecological Appraisal includes a desktop study and Extended Phase 1 Habitat Survey, which will identify the requirements for any specific protected surveys, which will then be carried out.</i> <i>This approach to the assessment of potential significant effects on biodiversity is acceptable, with the exception of the European designated site.</i>	

EIA METHODOLOGY

CONSULTEE / COMMENT	WHERE ADDRESSED
<p><i>The development site is in close proximity to the following European and National designated sites and Local Plan policy NH2 applies:</i></p> <ul style="list-style-type: none">■ <i>Sefton Coast SAC</i>■ <i>Ribble and Alt Estuaries SPA and Ramsar site;</i>■ <i>Mersey Narrows and North Wirral Foreshore SPA;</i>■ <i>Sefton Coast SSSI;</i>■ <i>Ribble Estuary SSSI;</i>■ <i>Mersey Narrows SSSI; and</i>■ <i>North Firral Foreshore SSSI.</i> <p><i>The Habitats Regulations Assessment (HRA) of the Liverpool Local Plan consultation draft (Liverpool local Plan consultation draft: Habitats Regulations Assessment, AECOM, 5th July 2016) identifies potential significant effects on the following European designated sites from the quantum of development:</i></p> <ul style="list-style-type: none">■ <i>Mersey Estuary SPA & Ramsar: disturbance to quantifying bird species from recreational pressure;</i>■ <i>Sefton Coast SAC: recreational impacts; and</i>■ <i>Ribble & Alt Estuaries SPA & Ramsar: recreational impacts.</i> <p><i>Recreational pressure is recognised in the formal statutory Conservation Advice Packages as Medium-High risk to quantifying features of the European sites.</i></p> <p><i>Any full planning application must demonstrate how it will avoid or mitigate recreational pressure on the European designated sites to enable an HRA to be undertaken. This information should be included in the ES.</i></p>	
<p><u>Waste</u></p> <p><i>Section 3.2 ‘Relevant Planning Policy and Guidance’ should be updated to include reference to Merseyside and Halton Joint Waste Local Plan (WLP), as policies WM8 and WM9 are relevant to the proposal.</i></p> <p><i>The EIA Scoping report refers to waste but does not propose to assess the impacts of waste as part of the EIA. I concur that this is satisfactory, unless the energy strategy determines there is a potential to use refuse derived fuel or biomass to fuel a combined heat and power plant or anaerobic digestion facility, in which case waste should be scoped into the EIA.</i></p> <p><i>However, MEAS note that the ES is proposed to include a chapter on Construction Strategy and CEMP, site waste management should be included within this chapter to demonstrate compliance with policy WM8 (Waste Prevention and Resource Management) of the Waste Local Plan and to ensure an integrated approach to resource management.</i></p> <p><i>Policy WM9 (Sustainable Waste Management Design and Layout for New Development) of the Merseyside and Halton Joint Waste Local Plan (WLP) and the National Planning Policy for Waste (paragraph 8, bullet point 2) apply. I advise that information relating to household and commercial waste storage and collection is required by policy WM9 and should be included with the planning application.</i></p>	<p>ES Volume II, Chapters 4 and 6</p>
<p><u>Low Carbon/ Renewable Energy</u></p> <p><i>The EIA Scoping report refers to an Energy Strategy being established for the site, which could include CHP. Given the scale of the development the inclusion of low carbon or renewable energy is important, and consideration should be given to a variety of sustainable energy sources as part of the energy strategy, especially given the commitment to consider climate change impacts as part of the ES.</i></p>	<p>The Applicant is committed to delivering a sustainable development at Goodison Park Legacy Project (GPLP). However, it is recognised that the necessary delay to the commencement of the GPLP, associated with the requirement for the new stadium to be constructed at BMD and Everton relocated prior to any demolition works starting at Goodison Park, means that work on site is not expected to commence until 2024. During this time, technology and regulations, guidance & targets regarding sustainability (e.g. BREEAM, Building Regulations) could change and therefore affect the sustainability and energy strategy for the GPLP development. As the design of the GPLP progresses, a sustainability strategy will be developed to identify the options available for low and/or zero carbon energy use and sustainable practices, such as waste and recycling and sustainable travel to / from the site.</p> <p>As a minimum the proposed development will be compliant with the relevant Building Regulations.</p> <p>In addition, as the outline application proposes a number of uses in which the end occupier is not yet confirmed, such as the D1 Use Class (Non-Residential Institution) floorspace which encompasses a range of facilities/services, the strategy regarding suitable energy options and sustainable practices cannot be meaningfully concluded at the outline application stage.</p> <p>As such, the Applicant commits to the provision of a site wide sustainability strategy at the Reserved Matters stage, secured via a planning condition, that is commensurate with the contemporary sustainability standards at that point in time to ensure that the GPLP is developed in accordance with a suitable and relevant strategy regarding energy and sustainable practices.</p>

EIA METHODOLOGY

2.5 PUBLIC CONSULTATION

2.5.1 Consultation Process

Details of the public consultation and fan engagement undertaken by the Club are included with in the submitted Statement of Community Engagement. Due to the relationship between the proposed stadium at BMD and the redevelopment of Goodison Park, the consultation covered both and was therefore a consultation regarding The People’s Project, rather than just the Goodison Park Legacy Project (GPLP).

The public consultation was divided into two stages:

- **Stage 1, November – December 2018:** focused on the principle of the Club relocating from Goodison Park to BMD and the initial ideas for the redevelopment of Goodison Park; and
- **Stage 2, July - August 2019:** presented emerging designs for the new stadium and presented the emerging illustrative masterplan for the GPLP.

Both consultations involved a roadshow which travelled around the City Region across a number of days, providing the opportunity for people to read the consultation material, ask questions and complete a questionnaire. Other methods of responding included via the project website or via post. The consultations were advertised via post, social media, newspapers (local and national) and the project specific website.

Over 20,000 people responded during the first stage public consultation. This included people from all six authorities of the Liverpool City Region and beyond. Of the respondents, 10 per cent (1,919) identified themselves as being either non-football fans or followers of clubs other than Everton. The headline findings are as follows:

- 97% of respondents stated that it was important for Everton Football Club to remain in the City of Liverpool;
- 86% of respondents stated that Everton should remain in North Liverpool; and
- 95% of respondents agreed that Goodison Park should be developed as a community legacy project.

Over 43,000 people participated in the second stage consultation. This included people from across the City Region and beyond. Of the respondents, 7 per cent (2,726) identified themselves as being either non-football fans or followers of clubs other than Everton.

Key findings relating to the GPLP are as follows:

- 91% of respondents supported / strongly supported the proposed mix of uses at Goodison Park; and
- 92% of respondents supported / strongly supported the proposed design & layout of the development.

Levels of support were also overwhelming among respondents who indicated that they live in the L4 postcode i.e. in close proximity to Goodison Park:

- 87% respondents who indicated that they live in the L4 postcode either supported or strongly supported the proposed mix of uses at Goodison Park; and
- 88% either supported or strongly supported the proposed design and layout of the development.

Finally, respondents to the second stage public consultation were asked whether, in light of the information provided about The People’s Project and its potential impacts and benefits, would they prefer to see the continuation of The People’s Project or for the dock (BMD) to be left in its current state. In response:

- 96% favoured the continuation of The People’s Project;
- 2% had no preference;
- 1% preferred not to say; and
- 1% preferred to leave the dock in its current state.

The public consultation was far reaching and produced an overwhelming response. In recognition of this, The People’s Project consultation was named winner in the Best Property and Construction Campaign category at the 2019 Northern Marketing Awards in November 2019 and the Planning Awards 2020 for Stakeholder Engagement in Planning (Development Management).

Of note, a statistically significant number of responses came from people who are not Everton fans or who do not follow football at all, demonstrating that the interest in The People’s Project goes beyond the activity on the pitch.

The results of the consultation demonstrated the significant and ongoing support for The People’s Project as a whole. The thousands of comments received were reviewed and analysed and the findings are presented in the Statement of Community Engagement submitted with the application.

2.6 INITIAL PLANNING APPLICATION SUBMISSION (APRIL 2020) & CONSULTEE RESPONSES

In April 2020, the Club submitted an outline planning application to LCC (LPA application reference number 20O/0997). The application was supported by a previous version of this ES (CBRE, March 2020).

Following the consultation process, design revisions have been made to the proposed development. These amendments have been made in response to consultation comments received from LCC’s Urban Design Officer and Conservation Officer and subsequent comments received at a Places Matter Design Review. To take account of the design changes, an updated planning application has been submitted. This revised ES (CBRE, December 2020) has also been prepared in response to the design changes and has been submitted in support of the application.

The March 2020 iteration of the proposed development (which was the subject of the April 2020 planning application) is included as an alternative in Chapter 5 Alternatives and Design Evolution. Further information on the changes made in response to the comments is also set out in Chapter 5.

The December 2020 revised scheme that has been assessed in this revised ES is described in Chapter 3 Site Description and Development Proposals.

The consultee comments relevant to the ES, provided in response to application reference 20O/0997 to date, are set out in Table 2.3. The table also sets out where in the revised ES these comments are addressed. Where relevant, the consultee comments specific to each technical topic scoped in to the ES, and the responses to these, are also set out in each of the relevant technical topic chapters in this volume of the ES.

EIA METHODOLOGY

Table 2.3
Summary of Relevant Planning Application Consultation Responses

CONSULTEE				COMMENTS	WHERE ADDRESSED
Merseyside (MEAS)	Environmental	Advisory	Service	<p>Ecology</p> <p>MEAS acknowledge the shadow HRA concludes that likely significant effects upon qualifying features of designated sites are not anticipated when considered alone and in combination with other projects. However, they request before this conclusion can be accepted and the shadow HRA accepted as the Council’s own assessment, an amendment to the shadow HRA is required:</p> <p><i>‘The shadow HRA states that the application site is located beyond the mean distance travelled from home to the relevant European sites (Liley et al (2017) indicates that this is 5.2km). However, the nearest accessible European sites (Sefton Coast SAC and Ribble and Alt Estuaries SPA and Ramsar sites) can be accessed from the Crosby Lakeside car park (GR 331907, 397371) which is 4.3km from the application site on the road network. The shadow HRA should therefore be revised prior to determination to take this into account. However, I advise that it is unlikely to affect the overall conclusions of the assessment.’</i></p> <p>MEAS also state <i>‘the proposed development is within the Natural England SSSI Impact Risk Zone (IRZ) (November, 2019). As the proposed development falls within the category ‘residential development in this area should consider recreational disturbance impacts’ Natural England must be consulted on the planning application prior to determination.’</i></p> <p>Further comments were provided regarding the potential for roosting bats on the site, advising that they have been recorded previously in similar settings, including at the Anfield Stadium. MEAS advise in their opinion that it is not possible to discount the potential presence of bats based on noise and lighting effects, particularly when the site is not subject to these effects on a continuous basis. MEAS therefore advise that further assessment of the impacts of the proposals on roosting bats is required prior to determination. As a part of this, the desktop study should be updated to find whether any records of bats have emerged from the vicinity of the site since 2017.</p> <p>MEAS also state <i>Built features or vegetation on site may provide nesting opportunities for breeding birds, which are protected and UDP policy OE5 applies’</i>, and recommend related planning conditions.</p>	<p>The shadow HRA has been updated to reflect the nearest accessible European site. The HRA is provided in Appendix 3.2, ES Volume III.</p> <p>Natural England have been consulted as part of the planning application consultation.</p> <p>An updated ecological desk study has been undertaken in response to the comments raised by MEAS and is presented in Appendix 3.2, ES Volume III.</p>
Merseyside (MEAS)	Environmental	Advisory	Service	<p>Archaeology/Heritage</p> <p>MEAS acknowledge the Heritage Statement correctly identifies the non-designated heritage assets which will be impacted by the proposals, however advises that further mitigation is required. They confirm Goodison Park Stadium is recorded on the Merseyside Historic Environment Record as MME17858, which is a non-designated heritage asset, confirming the historic interest was not sufficient to warrant legal protection but was noted.</p> <p>MEAS advise that as the proposed demolition will result in the complete loss of the non-designated heritage asset, it will be necessary to mitigate this loss via preservation by record, secured by means of a suggested condition:</p> <p><i>‘No development shall take place until the applicant has submitted a written programme of archaeological building recording for approval in writing by the local planning authority. The work shall be carried out strictly in accordance with the approved programme.’</i></p> <p>In addition MEAS state <i>‘The Programme of Archaeological Building Recording should be described in a Written Scheme of Investigation produced by an appropriately qualified and experienced archaeologist and should contain appropriate research objectives and a detailed programme of works that includes a specification of the methods to be used. The WSI should be of sufficient detail so that the impact of the proposed works can be properly assessed by the Local Planning Authority.’</i></p>	<p>This has been considered as part of the assessment for this Chapter and the Heritage Statement (Appendix 12.1, ES Volume III).</p> <p>This suggested condition can be applied by the local authority when determining the application.</p>
Merseyside (MEAS)	Environmental	Advisory	Service	<p>EIA Conformity</p> <p>MEAS confirmed they are satisfied that the requirements of the EIA are met and the ES can be used as a basis for determination of the application, providing the information requested under the other topics is provided.</p>	<p>Refer to the other MEAS comments in this table for where the additional information has been addressed.</p>
Merseyside (MEAS)	Environmental	Advisory	Service	<p>Waste</p> <p>MEAS confirm that waste is considered briefly in the ES, however advise that <i>‘in accordance with policy WM8, evidence through a waste audit or a similar mechanism (e.g. a site waste management plan) demonstrating how this will be achieved must be submitted and can be secured by a suitably worded planning condition’</i>, and suggest this could be incorporated in the Construction Environmental Management Plan (CEMP).</p> <p>MEAS acknowledge the Design and Access Statement shows locations of bin stores and access for collection, but as this is an outline application the details have not been finalised. They advise this information should be secured by a suitably worded condition for the Reserved Matters application to demonstrate compliance with WLP policy WM9 and Liverpool UDP policy HD18.</p>	<p>These suggested conditions can be applied by the local authority when determining the application.</p>
Merseyside (MEAS)	Environmental	Advisory	Service	<p>Sustainability</p> <p>The Sustainability Strategy suggested within the Planning Statement is welcomed by MEAS and should be secured via an appropriately worded planning condition.</p>	<p>This suggested condition can be applied by the local authority when determining the application.</p>

EIA METHODOLOGY

CONSULTEE	COMMENTS	WHERE ADDRESSED
LCC Urban Design Officer and Case Officer— (several responses provided over various dates)	<p>22 May 2020</p> <p>The Case Officer raised concerns on the setting of parameters and design principles. <i>‘Given the level of design work that has been done, which in turn underpins the EIA work, I would expect that the club wish to secure approval for the key parameters of this development so that, as and when RM details come forward, they do not need to be considered from first principles (for example in terms of position of the main use classes within the site, scale and massing). We as the LPA would also want the outline application to fix the broad masterplan framework and key parameters at outline stage, so that any decision reflects the scope of the development that has been assessed.</i></p> <p><i>In addition, a clear framework and parameters given certainty over the masterplan coherence should reserved matters need to come forward in phases. This approach would potentially give the club more flexibility for delivery. Two plans are provided within the current suite of drawings — the Access and Servicing Plan and the Proposed Maximum Heights Plan — which address some of these matters, but are based on fairly detailed building envelopes and therefore would offer very limited flexibility for Reserved Matters.’</i></p> <p>LCC recommend that a set of parameters plans, to a framework level of detail, should be provided to support the application.</p> <p>Alongside these key parameters LCC suggest the key design principles for the development plots should be presented as a brief or code for each plot, <i>‘with the intention that these become approved documents to which future detailed designs will need to adhere, in order to bring the whole site forward in a comprehensive and coherent way.’</i></p> <p>The Case officer and Urban Design officer also raised a number of design related comments:</p> <p><u>Masterplan:</u> <i>‘...the masterplan presented needs to be paired back to its foundations, identifying the subdivision of the site to form coherent development blocks and indicating individual plots, public spaces, and routes between them. The fronts and backs of development within those plots needs to be further considered, particularly with regard to the relationship with the park and for the arrival to the development, from Walton Lane/ Spellow Lane/ Goodison Road.’</i></p> <p><u>Parking:</u> <i>‘The parking strategy needs to be reviewed and explained. Within the site, the ground floor level is dominated by space for car parking, comprising both open car parks and under-croft parking beneath buildings. I understand that LCC Highways is broadly happy with the parking ratios proposed, however from an urban design perspective, the dominance of undercroft parking has concerning consequences for the building interface with the public realm. Ensuring natural surveillance of the streets and spaces, and that routes into and through the site are clearly defined and legible will be critical.’</i></p> <p><u>Central Park:</u> <i>‘...The developments with gardens on raised plinths, above ground level internal parking, needs to be reconsidered. This development form distances the residents/ occupants from offering natural surveillance to the park, takes away any opportunity for development activity along the built frontage to help animate the space, and in turn is unlikely to make park users feel safe and secure. An east west route, open to pedestrians/ and or vehicles may another way to assist in achieving this. Routes into the park from the existing streets are quite tight and not clearly defined or overlooked.’</i></p> <p><u>St. Lukes Church:</u> <i>‘The current stadium fails to provide an adequate setting for the church buildings located at the junction of Goodison Road and Gwladys St. The proposals will improve on this, but the curtilage of the church buildings will remain constrained and would benefit from further extension. Additionally, the scale of development proposed adjacent to the church buildings needs to be revisited. Block 1D is indicated as comprising up to 7 storeys of accommodation. Although the reasoning for it is taken on board, this element feels unduly prominent in the townscape and it is considered that it should not exceed 3 to 4 storeys. The juxtaposition between the scale of this element of the proposed scheme and that of the surrounding buildings is too stark.’</i></p> <p><u>Walton Lane/ Goodison Road:</u> <i>‘Within the southerly part of the site, the space between blocks is much greater and open car parking areas replace under-croft parking. The southern boundary of the site addresses Walton Lane - a primary route, with Stanley Park located beyond (a substantial tree screen). To this boundary sit three interlinked residential blocks of up to 6 storeys, and this is the area that has seen greatest change from pre-application. The proposals now better contain Walton Lane, however it is felt that the scheme fails to make the most of the prominent junction of Walton Lane and Goodison Rd, which is highly visible on the approach from the south.’</i></p> <p><u>Interfaces between uses:</u> <i>‘There are some tight relationships between blocks in different uses (residential versus public uses) in the northerly part of the site, which may prove problematic in terms of residential amenity (e.g. privacy/ overlooking, overbearing), such as between block F and blocks E, and between blocks B, blocks D and blocks C. Thought needs to be given to these relationships, both in terms of scale (heights and massing), and the positioning of window openings, any outdoor areas, plant and refuse storage. Greater breathing space could be beneficial between uses, which would in turn encourage movement from outside the site through the development and into, for example, the park.’</i></p> <p>LCC also suggested that new movement channels could be created to increase east/west connectivity across the site mainly for pedestrians, and the existing space between the previously proposed Block A and 1B, 2B and H needed further consideration.</p> <p>As summarised in the Design & Access Statement Addendum, the urban design feedback suggested that a number of wider strategic moves have not reached their full potential, associated with Stanley Park, the surrounding terraced streets and the relationship with St Luke's Church. The strategic approach has also been questioned: the perceived enclosure of the pitch potentially results in a private and protected space with limited surveillance; the partial retention of the pitch could also limit development plot flexibility; car parking currently dominates the public realm, and that the masterplan has been driven by a single architectural solution, potentially limiting future flexibility.</p>	<p>In response to the urban design comments, a full review of the proposed masterplan was undertaken by Planit-IE architects and the layout and heights were revised.</p> <p>After reviewing the comments on the April 2020 application, the design team analysed the existing masterplan to ascertain where there was potential to address the concerns, whilst respecting the original brief and aspirations of the project for the Club and the community. These are explained in more detail in the Design & Access Statement Addendum. The revised approach to the masterplan seeks to set up a series of flexible development plots underpinned by a strong vision, with Everton Football Club's legacy at its heart. It was also agreed during further conversations with LCC's Urban Design and Planning officers that the outline application should be delivered with a complete set of outline parameter plans, and these should be supported by a clear design rationale and plot briefing information.</p> <p>The design response in relation to the urban design comments is discussed in detail in the Design and Access Statement Addendum submitted alongside the planning application.</p> <p>The subsequent design changes have been assessed as part of the revised December 2020 planning submission, and reported within this revised ES.</p>

EIA METHODOLOGY

CONSULTEE	COMMENTS	WHERE ADDRESSED
	<p>During the design development process in response to the above comments, the urban design officer and case officer provided a number of further comments in relation to the revised design proposals. Their comments are summarised below:</p> <p>2 July 2020</p> <ul style="list-style-type: none">■ Requirement for Design Codes for the proposed plots, representing different phases of development.■ Form and function of the former pitch as a public space — LCC were unconvinced by the terraced walled garden and would like to see alternative options for this space.■ Create street/sense of place along the new road through the development (between Blocks A and B).■ A clearer strategy is required for referencing the former stadium and the Club's continued community role through the masterplan. The height of Block D1 is more of a direct retention of scale and mass which feels incongruous with the rest of the stadium. <p>30 July 2020</p> <ul style="list-style-type: none">■ The area shouldn't be dominated by car parking. Routes into the park need to be clear and pedestrian friendly to signpost the presence of the park space and lead people into the development.■ There was an ongoing concern regarding the enclosure of park space and lack of relationship with residential developments and podium spaces. One option discussed was increasing interaction between commercial / institutional buildings and the park space to have activity at ground level at the edge of the park e.g. previous Block G. <p>24 August 2020</p> <ul style="list-style-type: none">■ The park space should be enclosed with an active frontage. Disagree with proposed undercroft parking creating the two storey garden wall. LCC advised the need to decide for what/how the garden space will be used — unsure whether it will be a 'Mecca' for Everton fans in the future and can imagine the front wall and main gate being a fan focal point in the future but can't imagine fans taking pictures of the communal space as there would be no real indications that it was ever a football pitch.■ LCC understand justification for tall building next to the Church but don't agree with it, advising from an urban design perspective there is no justification. A tall building in this location would be an anomaly in the townscape in the future when people don't remember there was a stadium in this location and may create a precedent for larger scale development proposals in the immediate area. Don't see how LCC could justify this on an emotional argument alone.■ Queried what changes have been made regarding the plaza area behind the towers. <p>02 September 2020</p> <ul style="list-style-type: none">■ The Church of St Luke should be one of the most distinct and prominent features in the immediate vicinity, marking the corner plot. Current scale and massing of corner of Block 1D would diminish the prominence of the Church and appear unduly prominent. Advised it would be useful to view sections showing the relative height of the Church against the 4 storey blocks 1D and 2D enclosing the church.■ The 'Blue block' part of Block 1D should be restricted to a maximum hight of either 3 or 4 storeys, depending on the outcome of assessing sections requested. If the blocks surrounding the Church can be appropriately scaled at 4 storeys and does not appear to dominate the church building then it is appropriate for the corner of 1D to be 4 storeys also but there is no real justification for exceeding the height.	
LCC Recycling	<p>It was advised that a waste strategy would be required, however this can be conditioned, for both commercial and residential developments to ensure a sustainable approach and compliance with the Council's planning policy.</p> <p>In addition, residential blocks will need bespoke waste arrangements, including appropriate bin storage and access points for bin wagons.</p>	<p>This suggested condition can be applied by the local authority when determining the application, and agreed in detail at the Reserved Matters stage.</p>
Sport England	<p>Sport England confirmed that the application involves the loss of use of a playing field. They stated in light of 'The People's Project' (BMD development), the proposals for Goodison Park must be considered against Exception 4 of the loss of pitches policy, and that the Planning Statement demonstrates compliance with this.</p> <p>Sport England also encouraged embedding the principles of Active Design to guide detailed Reserved Matters applications, suggesting a planning condition requiring the Applicant to demonstrate how physical activity has been promoted and considered in the design and layout of future RM applications.</p> <p>Sport England suggested a Grampian Condition regarding delivery of new stadium prior to the demolition of the existing stadium at Goodison Park.</p>	<p>These suggested conditions can be applied by the local authority when determining the application with wording changes proposed by the Applicant.</p>
LCC Arboriculture	<p>LCC confirmed that there are no existing trees to be impacted and therefore have no objection to the application. They advised that the proposal provides a positive opportunity to introduce some green infrastructure / biodiversity to the site.</p>	<p>Comments have been taken into account and the opportunity to introduce some green infrastructure / biodiversity to the site is included within the parameter plans and will be detailed further at Reserved Matters stage.</p>
Merseyside Fire & Rescue Service	<p>Merseyside Fire and Rescue advised that the access for fire appliances should comply with the requirements of the Approved Document B5 of the Building Regulations.</p> <p>In addition, water supplies for fire fighting purposes should be risk assessed in liaison with UU with suitable and sufficient fire hydrants supplied.</p>	<p>Comments will be taken into account as part of the design process, at a more detailed stage in the design development.</p>

EIA METHODOLOGY

CONSULTEE	COMMENTS	WHERE ADDRESSED
LCC Air Quality	The Fire & Rescue Service also provided some guidance regarding the water supply required for different types of development. The Fire & Rescue Service requested that information is included within a future decision notice.	
	The Air Quality officer confirmed there would be unavoidable dust impacts during construction as predicted in the ES, but these would be temporary and localised. In order to minimise these impacts, the mitigation measures stipulated in Chapter 7.1 of the Air Quality Assessment should be implemented throughout the duration of the construction process.	Comments noted and the mitigation measures identified in the Air Quality report (Appendix 8.1, ES Volume III) will be adhered to throughout construction.
	LCC confirmed they were satisfied that the report has been carried out in accordance with the guidelines and best practice and therefore it can be considered an approved document.	
Lead Local Flood Authority (LLFA)	The LCC drainage engineer commented on section 4.5.3 of the Flood Risk Drainage Assessment, advising the first Issue proposed a maximum surface water discharge of 44.1 l/s however the Indicative Surface Water Drainage drawing within the FRDA shows a maximum surface water discharge of 38.1 l/s. Either of these proposed discharges are acceptable but the FRDA should be amended so that it is consistent.	Section 4.5.3 of the Flood Risk and Drainage Strategy report has been updated to ensure the runoff rate is consistent with the Surface Water Drainage drawing. The updated Flood Risk and Drainage Strategy report is provided in Appendix 14.2, ES Volume III.
LCC Contaminated Land	<p>LCC advised that standard conditions in relation to contamination should be included as part of any consent. These are detailed as follows:</p> <p><i>‘E013b – Site Investigations/Remediation Scheme</i></p> <p><i>No development shall take place on any phase, including any demolition, site clearance or ground works, until:</i></p> <p><i>a) An investigation and assessment methodology, including analysis suite and risk assessment methodologies has been completed and submitted to and approved by the local planning authority in writing, prior to any site investigations.</i></p> <p><i>b) A site investigation and assessment has been carried out by competent persons to determine the status of contamination including chemical, radiochemical, flammable or toxic gas, asbestos, biological and physical hazards at the site and submitted to the local planning authority. The investigations and assessments shall be in accordance with current Government and Environment Agency recommendations and guidance and shall identify the nature and extent of any contaminants present, whether or not they originate on the site, their potential for migration and risks associated with them. The assessment shall consider the potential risks to:</i></p> <p><i>i) human health</i></p> <p><i>ii) controlled waters</i></p> <p><i>iii) property (existing or proposed) including buildings, crops, livestock, pets, woodland and service lines and pipes</i></p> <p><i>iv) adjoining land</i></p> <p><i>v) ecological systems, and</i></p> <p><i>vi) archaeological sites and ancient monuments.</i></p> <p><i>c) A detailed remediation scheme (if required), has been submitted to and agreed in writing with the local planning authority. This scheme shall include an appraisal of remedial options, implementation timetable, works schedule, site management objectives, monitoring proposals and remediation validation methodology. The scheme once completed must ensure that the site will not qualify as contaminated land under Part IIA of the Environmental Protection Act 1990 in relation to its intended use.</i></p> <p><i>E014b – Remediation/Validation</i></p> <p><i>After development commences and prior to first occupation;</i></p> <p><i>a) Following completion of the measures identified in the approved remediation scheme and prior to occupation of any part of the development, a verification report which shall confirm the adequacy of remediation must be prepared and submitted to and approved in writing by the local planning authority before this condition will be discharged. If a phased approach to the development is being proposed, then a validation/completion report for an agreed number of plots within each of the proposed phases shall be submitted to the local planning authority and approved in writing before the condition relating to the phase in question shall be discharged.</i></p> <p><i>b) If any potentially contaminated (unusual/suspect) material or flammable/toxic gas not previously identified is discovered, this must be reported in writing to the local planning authority and a further assessment and a revised remediation scheme will be required by the local planning authority. If no contamination is found then this should be detailed in the remediation verification report.’</i></p>	These suggested conditions can be applied by the local authority when determining the application.
LCC Highways	<p>LCC Highways confirmed they have no highway objection to the proposed scheme subject to a number of conditions.</p> <p>LCC state the transport assessment is a product of pre-application meetings with the LPA and Highways advice and includes assessment of the likely traffic impacts and any connectivity and active travel requirements which the development proposals would generate.</p>	<p>These suggested conditions can be applied by the local authority when determining the application. The Applicant has confirmed that the internal roads proposed through the masterplan will be privately managed and not adopted by LCC.</p> <p>The submitted Transport Assessment (Appendix 7.1, ES Volume III) provides a response regarding the s106 contributions sought.</p>

EIA METHODOLOGY

CONSULTEE	COMMENTS	WHERE ADDRESSED
	<p>In relation to highways works to enable the development, LCC states <i>‘the extent of these works will be determined at the detail planning stage and when the reserved matters applications are submitted for each phase of development however; it has already been identified within the TA that a highway improvement will be required to the Spellow Lane / Walton Road junction, which will improve pedestrian connectivity and remove the left turn filter lane to the junction and also pedestrian improvements in the form of crossing points installed to the adjacent roads. Highways would confirm that these works should be included within a s278 highway agreement and can be coupled with other highway works deemed necessary to the development depending on the phase being brought forward and the associated demands.’</i></p> <p><i>‘The proposed layout of the internal roads would be subject to the s38 adoption process and service vehicle tracking would be required to prove safe access through the development and as such, access and layout are not agreed at this time. A highway drainage and street lighting scheme would also be required as part of the s38 requirements. Furthermore, it is likely that the surrounding footways to the development will require resurfacing and redundant vehicle crossovers removed and the footway reinstated as part of the detail designs for the development.’</i></p> <p>LCC’s walking and cycling officer advised that <i>‘to enable the development to link in with the Council’s proposals for active travel there will be a requirement for s106 obligations in the form of commuted sums to introduce and assist with funding the connectivity to the site from the LCWIP 2a along the entire length of Priory Road, together with improvements to the public realm/reduction in traffic dominance at the district shopping centre along this road. The development should also consider the potential to provide connectivity improvements through both the Park and Cemetery sites (to Cherry Lane) for all modes, as this will help to reduce the dominance of vehicles and demands for parking within the development.</i></p> <p><i>Furthermore, exemplary cycle parking in prominent positions within the site should be provided. Permeability and modal filters/filtered neighbourhoods need to be considered for access to and from the site between Goodison Road and the A59 where there are road closures and one way systems operating.</i></p> <p><i>Filtered neighbourhoods would also be required through Bullens Road, Diana Street and Muriel Street as they are all residential and some are also fronted by a school; a review of the parking linked to such filtering would also be a requirement.’</i></p> <p>LCC advise conditions should be included with any consent relating to:</p> <ul style="list-style-type: none">■ Highways details■ Highway Phasing Plan■ Submission of Details — Adoptable Streets■ Discharge of Surface Water■ Access Road — Surfacing■ Parking and Servicing Areas■ Cycle Parking■ Construction Management■ Travel Plan Co-ordinator■ Travel Plan and Residential Travel Plan■ Waste, Recycled Goods and Servicing <p>A number of informatives are also proposed.</p>	
Natural England	<p>Natural England (NE) advised that further information is required to determine impacts on designated sites. NE commented that uncertainties remained relating to effects that may become significant when considered in combination with other plans or projects. NE advised that additional information should be submitted by the applicant in order for LCC to fully assess the proposal. If following the submission of additional information LCC conclude, as the competent authority, that there is a likelihood of significant effects, or uncertainties, LCC should undertake an appropriate assessment in order to fully assess the implications of the proposal in view of the conservation objectives for the European site(s) in question. Natural England must be consulted on any appropriate assessment LCC may decide to make.</p> <p>NE advised further consideration was required within Section 5 of the HRA to fully assess all potential projects and plans which could act in-combination with the proposed development.</p> <p>The in-combination assessment needs to assess whether there are any other plans and projects in the vicinity which have the same effect as this development. This could include plans or projects from neighbouring Local Planning Authorities.</p> <p>NE note that Liverpool Local Plan (5.2.1) and Wirral Local Plan (5.2.2) have been included within section 5.2 of the HRA however it is not clear how any in-combination impacts associated with these plans have been ruled out, therefore further justification is required.</p>	<p>The list of cumulative developments to be considered in the assessment were agreed with Liverpool, Sefton and the Wirral councils. These schemes are detailed in Table 2.6 of this ES chapter.</p> <p>Following further consultation with NE, it was confirmed that the list of schemes agreed with the local authority should provide appropriate coverage of surrounding developments.</p> <p>The text in the shadow HRA has been amended to further clarify the potential for Likely Significant Effects (LSE) with the Liverpool Local Plan and Wirral Local Plan. Confirmation has been included that in the absence of LSE as a result of the proposed development, there is no additive or synergistic effect upon any designated site and therefore when the application site is considered in combination with other plans, LSEs are not anticipated.</p>

EIA METHODOLOGY

CONSULTEE	COMMENTS	WHERE ADDRESSED
LCC Conservation	<p>10 June 2020</p> <p>The LCC conservation officer initially recommended that a decision is deferred until a site visit is possible as LCC cannot assess the impact of the three towers proposed, which are nearer to the park than the existing stadium. LCC considered whether the stadium should be regarded as a non-designated heritage asset and if so, there is a requirement to identify the potential impacts upon this asset. LCC also advised it was difficult to envisage how the stadium structures could be retained in a meaningful or economically viable manner, and stated the three towers should be reduced below the height of the tree belt within the park or to have a profile no larger than the existing stadium.</p> <p>16 July 2020</p> <p>LCC conservation confirmed the registered parks are already compromised by the football stadia of EFC and LFC, and advised the only part of the redevelopment proposals that would potentially harm the nearby heritage assets are the three, 8-storey residential towers fronting onto Walton Lane. The Officer stated an illustration comparing the three towers against the existing stadia had not been provided but it was assumed that the top of the towers would be the same height as the top of the Goodison lettering above the Park End Stand. The Officer also advised the towers would be closer to Walton Lane than the existing stadium, increasing their impact on the heritage asset, and the height of the towers should be reduced by one and ideally two storeys to reduce their impact. The Officer stated there is a gap in the tree belt along Walton Lane, adjacent to the central part of the park lake which could make the towers highly obtrusive, advising consideration should be made to designing new and reinforcing existing landscaping, to minimize harm caused by the towers. Setting back the towers would help to minimise the impact (N.B. A note from Planning Officer states that this is not the preferred approach from an Urban Design perspective).</p> <p>The Officer advised the harm to Anfield Cemetery is limited to the Walton Lane entrance and short section of avenue immediately behind the lodge. These areas are considered harmed by the scale of the towers and the blue fin projecting from the front. The Officer suggested softening the impact of the blue fins.</p> <p>The response concluded that the decision as to whether the stadium is a non-designated heritage asset is a 'subjective and political one' and advised taking a lead from the public and members: <i>'If there are significant demands for elements of the application site being regarded as a non-designated heritage asset, we should advise the applicants accordingly'.</i></p> <p>LCC recommend that the approval of the principle of the development is agreed but that the three towers should be lowered and set back to reduce the harm to the setting of Stanley Park and Anfield Cemetery.</p>	<p>As detailed earlier in this table, in response to consultee comments in relation to urban design, the maximum proposed heights of buildings has generally been reduced across the masterplan. The maximum proposed height along Walton Lane is now 22m (6 storeys) at the south-eastern corner of Plot B. The majority of the Walton Lane frontage will be lower, at 5 storeys or a maximum building height of 18.5m.</p> <p>The submitted Townscape & Visual Impact Assessment provides viewpoints within Stanley Park and Anfield Cemetery to demonstrate the potential impact of the proposed development, in comparison with existing views containing the stadium (Appendix 11.1, ES Volume III).</p> <p>The submitted ES Chapter regarding Built Heritage (Chapter 12, ES Volume II) and the accompanying Heritage Statement (Appendix 12.1, ES Volume III) identify Goodison Park as a non-designated heritage asset and consider it as such in the assessment of the impacts of the proposed development upon built heritage.</p>
United Utilities	<p>United Utilities (UU) advised the site should be drained on a separate system for foul and surface water. UU suggest two conditions relating to drainage.</p> <p>UU suggested a condition in relation to sustainable drainage systems (SuDS) management and maintenance.</p> <p>UU also advise a water main and several public sewers cross the site. UU require access to water mains and will not permit development on or in close proximity to the main. A specific department in UU can provide the precise location of the water main. The applicant should contact UU regarding any future water supply and public sewer connections.</p>	<p>These suggested conditions can be applied by the local authority when determining the application.</p> <p>The location of the water main will be assessed in detail at reserved matters stage, and if required the possibility of diversion works will be considered.</p>
Historic England	<p>Historic England's (HE) principle consideration is the impact of the proposed development on Stanley Park.</p> <p>HE advise when Everton move from Goodison Park, this would lose the historic and significant relationships between park and club, impacting on the overall significance of the park.</p> <p>HE confirm that as the application is in outline, an accurate assessment of the potential impact of the redevelopment of the site on Stanley Park cannot be undertaken, however visualisations showing the massing of the taller elements show that this could be visible in views towards the site from Stanley Park.</p> <p>HE are satisfied that in principle a scheme could be designed to ensure that any impact on Stanley Park is kept to a minimum, and suggest that safeguards are built in to the permission to ensure that the significance of Stanley Park continues to be a key consideration in Reserved Matters applications.</p> <p>HE confirmed they do not have any objection to the application on heritage grounds, subject to safeguards mentioned.</p>	<p>The effects of the proposed development on the setting of Stanley Park have been assessed in Chapter 12; Built Heritage, ES Volume II, in accordance with Good Practice Note 3: The Setting of Heritage Assets. This assessment has been undertaken based on a review of the Accurate Visual Representations (AVRs) provided in the TVIA report (Appendix 11.1, ES Volume III), as well as site visits and a review of Chapter 3: Site Description and Development Proposals, ES Volume II, and the Design and Access Statement (DAS) and DAS Addendum submitted alongside the planning application.</p> <p>The impact on Stanley Park will be a consideration during future Reserved Matters applications.</p>
Merseytravel	<p>Merseytravel requested that all highway improvements required by LCC should ensure that traffic likely to be generated by the development would not impede the passage of bus services. The response advised the Walton Lane junctions with Priory Road, Walton Breck Road and Queens Drive and the County Road / Spellow Lane junction are of particular concern. Merseytravel noted the proposed improvements for the Walton Lane / Spellow Lane junction and would wish to see the junction and above listed locations appropriately addressed in line with views of LCC's Highways department.</p> <p>Merseytravel requested that a Travel Plan is implemented for all uses within the site as a condition of any planning approval. The Travel Plan should be managed for at least 5 years from the completion of the first substantive element of the development. The management should include the developer providing LCC with a regular audit of the Travel Plan's impact.</p> <p>Merseytravel also advised the developer should construct all internal highways arrangements to a design and format that would facilitate ease of access for Merseytravel Merseylink dial-a-ride vehicles and other relevant demand responsive bus services, to all properties within the development.</p>	<p>The design comments from Merseytravel have been noted and will be incorporated into the detailed design where appropriate.</p> <p>As stated in the Transport Assessment (Appendix 7.1, ES Volume III), following a site visit in December 2020 Mott MacDonald identified that highway works are underway on Walton Lane and all bus stops were in the process of being upgraded with access kerbs and bus shelters. The Spellow Lane — Walton Lane stop lacks an access kerb and the Walton Lane — Priory Road stop lacks a bus shelter. It is considered an omission that these stops are not being upgraded as part of the Walton Lane improvements in line with other stops, given that these are in use by local residents and also on match days. Notwithstanding this, the Club will fund the upgrade of the bus stops subject to the facility not being provided by LCC upon completion of the ongoing Walton Lane Highway Works.</p>

EIA METHODOLOGY

CONSULTEE	COMMENTS	WHERE ADDRESSED
	<p>In addition, to ensure adequate access to the public transport network, Merseytravel would wish to see upgrades to five bus stops close to the development site to provide access kerbs to all and a shelter to one, including:</p> <ul style="list-style-type: none">■ S40072D - Walton Lane — Spellow Lane - installation of access kerbs■ S40072C - Walton Lane — Goodison Road - installation of access kerbs■ S40072D - Walton Lane — Goodison Road - installation of access kerbs■ S40103A - Walton Lane — Priory Road — installation of access kerbs and a shelter■ S40119B - Walton Lane — Newby Street — installation of access kerbs	
LCC Planning Policy	<p>The LCC planning policy response confirmed that the site is out of centre, therefore the application requires a sequential test to be undertaken. Due to the amount of retail floorspace proposed an assessment of impact is also needed to address the requirements of the NPPF.</p> <p>Therefore, in the absence of a sequential test and impact assessment, the application cannot be supported from a planning policy perspective.</p>	<p>With regards to the impact assessment, the amount of retail floorspace in the proposed development has been reduced to ensure it is below the impact assessment threshold. LCC’s Planning Policy response was later revised to agree that the application site is edge-of-centre and that a retail impact assessment is not required on the basis that less than 350 sq m of A1 use class development is proposed in the revised scheme.</p> <p>A sequential test has been undertaken and is reported in Appendix 1 of the Planning Statement Addendum.</p>
LCC Noise Officer	<p>The LCC Noise Officer agreed with the findings of the noise assessment reported in the ES, that the operational phase of the proposed development will not have any significant adverse noise or vibration impacts on existing nearby residents.</p> <p>They outlined a number of conditions that they recommended should be attached to any future planning consent:</p> <ul style="list-style-type: none">■ <i>‘The residential units hereby approved shall be acoustically insulation in accordance with the façade insulation scheme detailed in Drawing Number SK06 of Appendix 9.1 of the Environmental Statement which was submitted in support of this application.</i>■ <i>The hours of operation set for the business (including servicing) should take into account the operating hours of similar businesses situated in the area concerned.</i>■ <i>A kitchen extract system shall be installed to all areas where hot food is to be prepared. Any extract ducts included shall be acoustically insulated and acoustically isolated from associated fans and the building structure. The discharge point shall be at least 1 metre above the eaves or in other such position as to minimise the likelihood of nuisance to neighbouring premises.</i>■ <i>Any waste generated by the business to be discarded as refuse should be kept within the curtilage of the premises and should only be placed outside on such days as trade refuse collection will occur.</i>■ <i>Noise control measures must be employed within the development such that sound generated within the commercial entertainment areas does not give rise to noise levels exceeding NR30 in the residential accommodation (expressed in terms of the maximum L_{Aeq} (1 minute) linear sound pressure level in each octave band).</i>’	<p>These suggested conditions can be applied by the local authority when determining the application.</p> <p>The text in bold in the ‘comments’ column (L_{Aeq} (1 minute) linear) has been added in to the condition wording as a clarification for discussion with the LCC EHO.</p>

EIA METHODOLOGY

2.7 SENSITIVE RECEPTORS

The sensitive receptors listed below have been identified in the vicinity of the application site. The assessments focus on identifying the effects of the proposed development at/on these receptors within the relevant chapters of the ES:

- European-designated Natura 2000 sites located within a 10km radius of the site:
 - Dee Estuary Special Area of Conservation (SAC);
 - Sefton Coast SAC;
 - Ribble & Alt Estuaries Special Protection Area (SPA) and Ramsar Site;
 - Mersey Estuary SPA and Ramsar Site;
 - Mersey Narrows & North Wirral Foreshore SPA and Ramsar Site; and
 - Liverpool Bay SPA.
- Residential properties and other uses sensitive to noise and air quality impacts in proximity to the application site and local road network, including:
 - Residential properties located along Goodison Road, Spellow Lane, Oxtan Street, Winslow Street, Eton Street, Neston Street, Andrew Street, Nimrod Street, Gwladys Street, Leta Street, Bullens Road, Muriel Street and Diana Street;
 - Gwladys Street Community Primary and Nursery School and Everton Free School; and
 - Church of St Luke the Evangelist, Salop Chapel Free Presbyterian Church and Spellow Lane Church.
- Residential properties and other uses sensitive to daylight, sunlight, overshadowing and/ or wind impacts, either directly adjacent or in very close proximity to the site;
- Statutory and non-statutory designated built heritage assets in proximity to the application site, including:
 - Listed buildings, including within Anfield Cemetery (Grade II*) and Stanley Park, Liverpool (Grade II*) and a number of Grade II listed buildings in the surrounding area; and
 - Anfield Cemetery (Grade II*) and Stanley Park, Liverpool (Grade II*) Registered Historic Parks and Gardens of special historic interest.
- Walton on the Hill Conservation Area (located approximately 525m to the north of the site);
- Liverpool Maritime Mercantile City UNESCO World Heritage Site (located approximately 2.2km to the south west of the site);

- Any previously unrecorded archaeological assets that may be present in the ground beneath the application site;
- National, County and District Landscape Character Areas within the visual envelope of the site;
- Any statutory and non-statutory designated landscapes within the visual envelope of the site;
- Geology and aquifers beneath the application site, comprising Chester Pebble Beds Formation bedrock (Principle Aquifer);
- Surface water features including:
 - Stanley Park Lane (separated from the application site by Walton Lane to the south);
 - The River Mersey (located approximately 2.7km to the west of the site); and
 - The Leeds & Liverpool Canal, which runs from north to south approximately 1.5km to the west of the application site;
- Local social and community services, including primary schools, secondary schools, and primary healthcare facilities;
- The townscape character of the local urban environment;
- Locations in the local area with open views of the site; and
- Sensitive receptors that would be brought to the site under the proposals, including site workers during the construction phase and those using/occupying the proposed residential properties, and other proposed uses, once operational.

2.8 ASSESSING AN OUTLINE APPLICATION – MAXIMUM PARAMETERS APPROACH

In accordance with the ‘Rochdale Envelope’ approach the assessment has been undertaken based on a number of outline parameters.

Planning permission for the proposed development is being sought via an outline application with all matters reserved (Access, Appearance, Layout, Landscaping and Scale).

The ‘Rochdale Envelope’ arises from two cases: R. v Rochdale MBC ex parte Milne (No.1) and R. v Rochdale MBC ex parte Tew [1999] and R. c Rochdale MBC ex parte Milne (No.2) [2000]. These cases dealt with outline planning applications for a proposed business park in Rochdale. The judgement within these cases set out the following key points that comprise the Rochdale Envelope approach to assessment of an outline application:

- The outline application should acknowledge the need for details of a project to evolve over a number of years, within clearly defined parameters;
- The environmental assessment must take account of the need for such evolution, within those parameters, and reflect the likely significant effects of such a flexible project in the environmental statement;

- The permission (whether in the nature of the application or achieved through ‘masterplan’ conditions) must create ‘clearly defined parameters’ within which the framework of development must take place. It is for the local planning authority in granting outline planning permission to impose conditions to ensure that the process of evolution keeps within the parameters applied for and assessed;
- Taken with those defined parameters of the project, the level of detail of the proposals must be such as to enable a proper assessment of the likely environmental effects, and necessary mitigation, if required considering a range of possibilities:
 - ‘The assessment may conclude that a particular effect may fall within a fairly wide range. In assessing the ‘likely’ effects, it is entirely consistent with the objectives of the Directive to adopt a cautious ‘worst case’ approach. Such an approach will then feed through into the mitigation measures envisaged.... It is important that these should be adequate to deal with the worst case, in order to optimize the effects of the development on the environment’ (Para.122 of the Judgement);
- The level of information required is: ‘sufficient information to enable ‘the main,’ or the ‘likely significant’ effects on the environment to be assessed..., and the mitigation measures to be described...’ (para.104 of the Judgement).

The following parameters and plans have formed the basis of the assessment process within the EIA.

2.8.1.1 Parameters

- Total Site Area: 3.4 ha
- Total residential units: Up to 173 units in a mix of apartments, mews houses and terraced houses. The proposed residential unit schedule including maximum square metre Gross External Area (sq.m GEA) floorspace areas, is provided in Table 3.6, in Chapter 3 Application Site & Proposed Development.
- Total commercial floorspace: Up to 5,512 sq.m GEA, the locations of the proposed commercial uses are indicated in Table 3.7 in Chapter 3, the uses proposed comprise:
 - Use Class A1-A5 (up to 750 sq m, comprising the following):
 - Retail (use class: A1) (up to 349 sq m of the 750 sq m proposed);
 - Financial and professional services (use class: A2);
 - Restaurants and cafés (use class: A3);
 - Drinking establishments (use class: A4);
 - Hot food takeaways (use class: A5); and
 - Business (use class: B1) (up to 4,762 sq m).

EIA METHODOLOGY

- Total residential institutions: Up to 5,863 sq.m GEA of floorspace proposed for use as a residential institution (use class: C2). As detailed in Chapter 3, Section 3.9.4, it has been assumed for the purposes of the assessments that the block will provide a 78 bed care home and 24 extra care apartments.
- Total non-residential institutions: Up to 9,998 sq.m GEA of D1 floorspace is proposed at the site in total. Further details are provided in Chapter 3, Section 3.9.5.
- Maximum building height:
 - The buildings range from two storeys to six storeys. The tallest building in the proposed development will form part of the residential block on the south-eastern area of the application site (Plot B). The eastern section of Plot B is up to six storeys in height (22.0 m Above Ground Level (AGL)).
 - Other taller elements of the proposed development include the southern parts of Plots A and B in the south of the site; the north and east sections of Plot D and Plot F in the eastern part of the site which are up to five storeys in height (18.5 m AGL)..
 - The maximum building heights proposed for each plot are provided in Table 3.7, Chapter 3 Application Site & Proposed Development.
- Car parking spaces: 402 carparking spaces will be provided, 202 of which will be on-street car parking spaces (combination of privately managed and publicly adopted streets) with the remaining 200 off-street.

Full details regarding the proposed development may be found at Chapter 3: Application Site & Proposed Development of this ES volume.

2.8.1.2 Parameter Plans

The parameter plans for the proposed development, which are included at the rear of Chapter 3: Application Site & Proposed Development of this ES volume, are as follows:

- Parameter Plan 01 – Development Plots (Figure 3.2);
- Parameter Plan 02 – Maximum Development Heights (Figure 3.3);
- Parameter Plan 03 – Ground Floor Uses (Figure 3.4);
- Parameter Plan 04 – Upper Floor Uses (Figure 3.5);
- Parameter Plan 05 – Access and Movement (Figure 3.6); and
- Parameter Plan 06 – Public Realm (Figure 3.7); and
- Parameter Plan 07 – Development Parcels (Figure 3.8).

2.8.2 Building Height and Development Plot Parameter Changes

The maximum building height and footprint parameters that informed the original March 2020 ES assessments were very closely aligned with the

proposed illustrative scheme built form. As a result, the parameters were restrictive, allowing minimal flexibility for subsequent design development.

For the December 2020 revised ES, new maximum building height and development plot parameter plans have been prepared that allow greater flexibility for future design development. Rather than closely aligning with the form of individual buildings, the parameters now define broader development zones or ‘development plots’ in which built form could come forward. This is a more typical approach to the setting of parameters for an outline planning application.

While the revised December 2020 building heights and floorspace quanta across the site have generally either reduced or remained consistent with the March 2020 scheme, due to this change in the approach to setting parameters, the scale of the development assessed in the revised December 2020 ES will be larger in some instances, potentially resulting in the reporting of impacts of a greater magnitude than were reported in the March 2020 ES for relevant topic areas, such as townscape and visual and daylight, sunlight and overshadowing. This is because the maximum plot extent and maximum plot heights are tested, thus resulting in the reporting of a worst-case scenario. It is unlikely that future development will take up the whole of the development plots to the maximum envelope of height and extent of the plot, as shown on the illustrative masterplan in the Design & Access Statement Addendum.

This approach has resulted in the reporting of impacts of a greater magnitude than were reported in the March 2020 ES chapter, in some instances.

2.9 ASSESSMENT SCENARIOS

2.9.1 Assessment Scenarios

The assessment scenarios considered within this ES are provided in Table 2.4 below.

Table 2.4

Assessment Scenarios

SCENARIO	CONSTRUCTION & OPERATIONAL PHASE ASSUMPTION
Baseline ('Do Nothing')	Expected evolution of baseline conditions surveyed 2017/2018/2019 assuming <u>no change to current site use</u>
The 'Proposed Development' Scenario	Effect of the proposed development on baseline conditions at this time <u>assuming proposed development comes forward at site</u>
The 'Proposed Development + Cumulative' Scenario	Effect of proposed development & cumulative schemes on expected baseline conditions at this time <u>assuming proposed development comes forward at site and cumulative schemes come forward</u>

The wider cumulative schemes include the proposals for a new stadium for Everton Football Club at Bramley Moore Dock.

2.9.2 Temporal Scope of Assessment

It is anticipated that the proposed development will be delivered in a phased approach. Construction would begin following the Club’s vacation of the site, which is currently anticipated to be in 2023, following completion of the new stadium construction. At this stage, it is envisaged that demolition/construction of at the site would commence in Q3 2024 the proposed scheme as a whole would therefore be completed by 2028 (“the opening year”). The first phase is indicatively anticipated to be completed by 2026.

Further details are provided within Chapter 4 Construction Strategy & CEMP of this ES.

2.10 NEW TECHNICAL TOPICS

As stated in Chapter 1 Introduction of this ES, this ES has been undertaken in accordance with the applicable EIA Regulations 2011 (as amended). However, recognising that the EIA Regulations 2017 have sought to further the rigour with which EIAs and ESs are undertaken and produced, this ES has also included consideration of technical considerations formally introduced with the 2017 Regulations. These include specific consideration of human health, climate change, biodiversity, and the assessment of the vulnerability of a project to risks of major accidents and/or disasters.

With regard to some of these elements (for example biodiversity and climate change) best practice has already included their consideration to an extent. However, as climate change, human health and risk of major accidents and/or disasters are of specific prominence and relevance to the proposed development these have been addressed separately below.

Climate change, human health and risk of major accidents and/or disasters has been covered in the Methodology section of each technical chapter. However, the following details have informed the assessment of each these topics within the technical chapters.

2.10.1 Climate Change

A summary of key climate change projections within the UK and modelled climate variables specific to the application site are set out below. Technical authors have been required to scope the potential for effects from climate change with respect to their technical area within their respective chapters.

Technical authors have considered the following within the context of the outlined climate change projections:

- The vulnerability of the baseline environment to projected changes;
- The vulnerability of the proposed development to climate change; and
- The effect of the proposed development within the context of climate change.

If climate change does not affect the assessment of the technical discipline, this has been stated.

EIA METHODOLOGY

2.10.1.1 Summary of Climate Change Projections

Key climate projections for the UK are as follows:

- Summers will become hotter and drier;
- Winters will become milder and wetter;
- Soils will become drier on average;
- Snowfall and the number of very cold days will decrease;
- Sea levels will rise; and
- Storms, heavy and extreme rainfall, and extreme winds will become more frequent.

Detailed climate projections for the study area have been accessed from the Met Office online as relevant by the technical authors.

www.metoffice.gov.uk/research/approach/collaboration/ukcp/index

In addition, the consideration of climate change is inherent in certain technical topics, such as flood risk, where the Environment Agency flood modelling includes climate change allowances.

2.10.2 Human Health

Many technical chapters already address the potential implications of their topics on human health by virtue of set target values or objectives (e.g. contaminated land, air quality or noise) based on human health tolerances or through the consideration of policy requirements and targets promoting healthier behaviours (e.g. active travel such as cycling and walking). Where this is the case, technical chapters explicitly state how such factors have been taken into consideration within the technical assessment and reference the relevant literature or studies that draw upon the human health outcomes anticipated as a result of the use of such targets.

For example, with regard to air quality the limit values are informed by guidelines set by the World Health Organisation (WHO) and therefore, the WHO Air quality guidelines have been referenced with regard to the potential impacts on human health in Chapter 8 Air Quality.

2.10.3 Risk of Major Accidents and/or Disasters

In the absence of recognised guidance on this subject in the context of EIA, CBRE has reviewed a range of sources providing guidance related to the topic, including:

- UK Government Emergency Response & Recovery Guidance (3); and
- International Federation of Red Cross & Red Crescent Societies Disaster and Crisis Management Guidance (4).

A disaster can be defined as “a sudden, calamitous event that seriously disrupts the functioning of a community or society and causes human, material, and economic or environmental losses that exceed the community’s or society’s ability to cope using its own resources. Though often caused by nature, disasters can have human origins” (4).

An accident can be defined as “an unfortunate incident that happens unexpectedly and unintentionally, typically resulting in damage or injury” (5).

The EIA Regulations 2017 state that the following should be provided within the ES in relation to this topic:

“a description of the expected significant adverse effects of the development on the environment deriving from the vulnerability of the development to risks of major accidents and/or disasters which are relevant to the project concerned.”

A comprehensive list of potential major disasters and accidents was reviewed as part of the Scoping exercise and may be found at Appendix 2.1, ES Volume III. The major disasters that have been ‘scoped in’ (given detailed consideration within the main volume of the ES) or ‘scoped down’ (included within the ES technical appendices but not meriting a stand-alone technical chapter within the main volume of the ES) are as follows:

- Floods; and
- Transport accidents.

2.11 THE ENVIRONMENTAL STATEMENT

In general, each of the technical chapters of this ES, provided in ES Volume II, is structured as follows:

- Introduction;
- Methodology;
- Baseline conditions;
- Potential significant impacts;
- Design interventions;
- Assessment pre-mitigation;
- Mitigation & enhancement measures;
- Assessment post-mitigation; and
- Inter-development cumulative effects.

The structure of the technical chapters – particularly the use of tables – has been devised to make the technical assessments better focussed and more accessible to readers, and to reduce the length of the main volume of the environmental statement.

Where information has been summarised in the tables, references are given as to where additional information is provided in the technical appendices (ES Volume III).

Where differences have arisen between the structure described below and that presented within a technical chapter, this is clearly explained in the chapter.

2.11.1 Introduction

This section provides details of:

- the company that has undertaken the technical assessment, as well as the author(s) and their professional qualifications;
- the purpose of the chapter;
- a list of figures supporting the assessment, which are provided together at the end of the chapter; and
- a list of all of the technical appendices that are relevant and referenced within the chapter.

2.11.2 Methodology

This section provides details of:

- the legislation, guidance, standards and policies that have informed the assessment;
- the consultees that have been contacted in preparing the chapter (e.g. technical officers at the local planning authority and officers at statutory consultees, such as the Environment Agency);
- the comments raised during scoping and a commentary on how the comments have been addressed within the assessment;
- where relevant, a description of how climate change, human health and risks of major accidents and disasters have been taken into account within the assessment;
- where relevant, any alternatives to the proposed development as set out in Chapter 5 Alternatives & Design Evolution that have been considered and assessed and the main reason for the choice made;
- Which assessment scenarios have been considered and through what means;
- any associated development (i.e. development which is required to facilitate the development but does not form part of the planning application, such as off-site utilities works) that is relevant to the assessment;
- how baseline conditions have been assessed (e.g. site visits/surveys/review of publicly available data) and the scale of sensitivity adopted within the assessment;
- how magnitude has been assessed – specifically whether there are any aspects of the project that are relevant to the assessment but not described in Chapter 3 Application Site & Proposed Development – and the scale of magnitude adopted within the assessment;
- how effect significance has been assessed, a standard matrix has been used in many technical chapters which is provided at Table 2., however, where appropriate specific technical chapters have used bespoke significance assessment approaches as informed by their respective professional bodies or technical guidance; and

EIA METHODOLOGY

- any assumptions or limitations.

2.11.3 Baseline Conditions

This section takes the form of a table that provides a list of:

- the key receptors that have been identified;
- a brief description of the baseline conditions relevant to the topic in question and the key receptors;
- the sensitivity attributed to each receptor; and
- where further details can be found within the relevant technical appendices.

2.11.4 Potential Significant Impacts

This section takes the form of a table that provides details of the potentially significant impacts of the proposed development, split by phase (i.e. construction or operation), and whether those impacts are likely to be adverse or beneficial in nature. It should be noted that the term ‘construction phase’ has been used within this ES to refer to both the demolition and construction activities proposed.

2.11.5 Design Interventions

Design interventions constitute alterations to the proposals, made to lessen adverse effects and improve beneficial effects (e.g. the siting of a building so as to avoid particularly sensitive habitats within the application site boundary). They differ from mitigation measures as they are incorporated into the design of the proposed development and, as such, will be shown on the application plans; while mitigation measures are not shown on the application plans and will need to be secured by other means (e.g. via planning condition or Section 106 agreement).

This section takes the form of a table and lists the design interventions that have been made to address the potential significant impacts of the proposals, the reason(s) that the intervention was included and where further details can be found within the relevant technical appendices.

2.11.6 Assessment Pre-Mitigation

This section takes the form of a table, which includes details of:

- whether the impact is relevant to the construction or operational phase of the development;
- the receptor(s) that are likely to be affected;
- the impact (including consideration of any design intervention);
- the magnitude of the pre-mitigation impact;
- the significance of the pre-mitigation effect;
- whether mitigation is proposed; and
- where further details can be found within the relevant technical appendices.

2.11.7 Mitigation and Enhancement Measures

This section takes the form of a table and includes details of:

- the phase during which the mitigation or enhancement measures will be implemented;
- the possible effect that is being mitigated;
- the mitigation and/or enhancement measure(s) being proposed;
- how each measure will be secured and when it will be triggered;
- the magnitude of the impact post-mitigation;
- whether the post-mitigation effect is adverse or beneficial; and
- where further details can be found within the technical appendices.

2.11.8 Assessment Post-Mitigation

This section takes the form of a table that includes details of:

- the phase during which the impact is applicable;
- the receptor(s) affected;
- the residual effect following the implementation of mitigation/enhancement measures; and
- the significance of the effect and whether it is adverse or beneficial, short-, medium- or long-term, direct or indirect, permanent or temporary, and reversible or irreversible.

2.11.9 Inter-Development Cumulative Impacts

This section assesses the final scenario: The ‘Proposed Development + Cumulatives’ Scenario. It takes the form of two tables. The first table includes details of:

- the list of schemes identified through scoping as having the potential to result in inter-development cumulative effects alongside the proposed development;
- a brief description of the other scheme(s), including a statement on where it is in the planning/construction process; and
- a description of whether the scheme is likely to result in inter-development cumulative effects for the specific topic area under consideration.

For those cumulative schemes considered relevant to the specific topic, the second table includes details of:

- the phase during which inter-project cumulative effects may arise;
- the receptor(s) likely to be affected;
- any additional measures that are required to mitigate the identified inter-project cumulative effects; and

- the significance of the effect and whether it is adverse or beneficial, short-, medium- or long-term, direct or indirect, permanent or temporary, and reversible or irreversible.

In some instances, for example where the cumulative schemes are not of relevance to the specific topic, a second table is not presented but reference made to the preceding Section ‘Assessment Post-Mitigation’ table, as the residual effect assessment remains the relevant one.

2.11.10 Deviations from the Above Approach

For some technical topics, the findings of the technical assessment across the various assessment scenarios are presented in a different manner. This is typically as a result of the manner in which the assessment is undertaken. Wherever this is the case in a technical chapter it is clearly stated in that Chapter’s methodology section that the approach has differed and why this is the case.

2.12 ASSESSMENT OF SENSITIVITY, MAGNITUDE AND SIGNIFICANCE

Ministry of Housing, Communities and Local Government (MHCLG) Guidance suggests that it is advantageous to devise generic assessment criteria for determining the significance of effects that can be applied to all environmental topics considered within an ES. This ensures that, where possible, effects are assessed in a comparable manner.

Prevailing good practice suggests that environmental impacts should be considered in terms of the importance, value or sensitivity of receptors and the predicted scale, or magnitude, of the potential impacts. The significance of potential effects should then be determined through consideration of respective sensitivity and magnitude.

In line with MHCLG Guidance and prevailing good practice, each of the environmental issues within the ES will be assessed following the same general approach, whereby the receptor sensitivity and magnitude of impacts are taken into consideration in establishing the significance of effects. All identified effects will be assessed using the same significance descriptors, which will help to provide a direct comparison between the effects assessed under each chapter.

Where methodologies have been adapted from specific industry recognised guidelines, e.g. Landscape Institute Guidelines, an explanation as to the chosen methodology will be provided within the relevant chapter.

The standardised approach to the assessment of effect significance across the technical chapters is described below. Where assessments have diverted from this methodology, the alternate approach is described in the relevant chapter.

2.12.1 Receptors & Sensitivity

Receptors are defined as the physical resources or user groups that are subject to impacts. They have been identified through a combination of desktop studies and site visits undertaken by the various members of the

EIA METHODOLOGY

EIA team. Further details are provided in each of the technical chapters, but sensitivity may depend on factors such as: rarity; quality; importance in an international, national, regional or local context and/or replaceability etc.

The sensitivity of receptors is considered as being ‘very high’, ‘high’, ‘medium’, ‘low’ or ‘negligible’. A table is included within the methodology section of each technical chapter explaining the rationale for each of these criteria. A summary is then provided at the end of the baseline conditions section to draw conclusions relating to the perceived sensitivity of identified receptors.

2.12.2 Impacts & Magnitude

Impacts are generally understood to be the changes resulting from an action.

The magnitude of an impact is considered as being ‘very large’, ‘large’, ‘medium’, ‘small’ or ‘negligible’. As with sensitivity, a table is included in each chapter explaining the rationale for each of these criteria. Where it is possible to do so, criteria are based on recognised standards and guidelines. Where this is not possible, the criteria are based on expertise and professional experience.

2.12.3 Effects & Significance

Effects are generally understood to be the consequences of impacts. The significance of the effect is informed by the magnitude of the impact and the sensitivity of the receptor.

The assessment of significance within the ES is also considered using a common scale, with effects described as being ‘major’, ‘moderate’, ‘minor’ or ‘negligible’ (which also includes ‘neutral’ or ‘no impact’ assessments). Whilst a standard significance matrix methodology is used by a number of technical chapters, as previously described, the method for ascribing significance is also left to the judgement of each technical consultant, so that it reflects best practice within their specialist area.

The significance matrix that is used in the absence of any other professional guidance is provided in Table 2.5.

Table 2.5
Significance Matrix

MAGNITUDE OF EFFECT	SENSITIVITY OF RECEPTOR				
	Very High	High	Medium	Low	Negligible
Very Large	Major Significance	Major Significance	[3]	Moderate Significance	[1]
Large	Major Significance	[3]	Moderate Significance	Minor Significance	[2]
Medium	[3]	Moderate Significant	Minor Significance	[2]	Negligible Significance

MAGNITUDE OF EFFECT	SENSITIVITY OF RECEPTOR				
	Very High	High	Medium	Low	Negligible
Small	Moderate Significance	Minor Significance	[2]	Negligible Significance	Negligible Significance
Negligible	[1]	[2]	Negligible Significance	Negligible Significance	Negligible Significance
[1] The choice between ‘Moderate Significance’, ‘Minor Significance’ and ‘Negligible Significance’ will depend on the specifics of the impact and will be down to professional judgement and reasoning.					
[2] The choice between ‘Minor Significance’ and ‘Negligible Significance’ will depend on the specifics of the impact and will be down to professional judgement and reasoning.					
[3] The choice between ‘Major Significance’ and ‘Moderate Significance’ will depend on the specifics of the impact and will be down to professional judgement and reasoning.					
n.b. ‘Negligible Significance’ includes ‘Neutral’ and ‘No Impact’ assessments.					

Broad definitions for each of these descriptors are provided below:

- **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.
- **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
- **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.
- **Major** - These effects may represent key factors in the decision-making process. Potentially associated with sites and features of national importance or likely to be important considerations at a regional or district scale. Major effects may relate to resources or features which are unique and which, if lost, cannot be replaced or relocated.

Effects are generally considered to be ‘Significant’ where they are of ‘Moderate’ or ‘Major’ significance (either adverse or beneficial).

In addition to the significance of the effect, statements are also made as to whether effects are adverse or beneficial, direct or indirect, temporary or permanent, reversible or irreversible, short-, medium- or long-term and/or cumulative. Definitions and examples for each are provided below:

- **Adverse** – a harmful or unfavourable effect (e.g. the loss of trees to allow the construction of new buildings)
- **Beneficial** – a favourable or advantageous effect (e.g. the creation of jobs as a result of proposed construction works)

- **Direct** – an effect without intervening factors (e.g. the removal of trees to allow for the construction of new buildings)
- **Indirect** – an effect not directly caused by the development (e.g. changes to the pattern of traffic movements across the road network as a result of a new road being constructed)
- **Temporary** – an effect lasting only for a limited period of time (e.g. piling during construction)
- **Permanent** – an effect lasting or intended to last or remain unchanged indefinitely (e.g. land reclamation from the sea)
- **Reversible** – an effect that is capable of being reversed so that the previous state is restored (e.g. the removal of solar panels to revert to grazing pasture)
- **Irreversible** – an effect that is not capable of being undone or altered (e.g. gravel extraction)
- **Short term** – an effect lasting between 0 and 5 years
- **Medium term** – an effect lasting between 5 and 10 years
- **Long term** – an effect lasting more than 10 years
- **Cumulative** – increasing by one addition after another (e.g. traffic generated by different developments occurring in close proximity to one another)

2.13 ASSESSMENT OF CUMULATIVE EFFECTS

Cumulative effects can be either:

- The combined or ‘inter-development’ cumulative effect of the proposed development together with other existing or reasonably foreseeable developments (taking into consideration effects at both the construction and post-construction/operational phases); and
- The combined, synergistic or ‘intra-development’ cumulative effects caused by the combination of a number of effects on a particular receptor (taking into consideration effects at both the construction and operational phases), which may collectively cause a more significant effect than individually.

Where relevant, inter-development cumulative effects are described within each technical chapter. Intra-development cumulative effects, meanwhile, are considered within Chapter 12: Intra-Development Cumulative Effects.

Through consultation with LCC, 9 forthcoming schemes, as shown in **Error! Reference source not found.6**, have been identified with potential for inter-development cumulative effects alongside the proposed development.

Table 2.6
Cumulative Schemes Considered within ES

EIA METHODOLOGY

NAME / ADDRESS / PLANNING REF	DESCRIPTION	STATUS
The People's Project - Bramley Moore Dock Stadium 20F/0001	Proposals for infill of the dock, and construction of a new stadium (Use Class D2) predominantly for football use with the ability to host other events with ancillary offices (Use Class B1a); Club Shop and retail concessions (internal and external to the stadium) (Use Class A1); exhibition / cultural centre and conference facilities (Use Class D1); food and drink concessions (internal and external to the stadium) (Use Classes A3 / A4 / A5); betting shop concessions (Sui Generis); for Everton Football Club at Bramley Moore Dock.	Pending determination
Liverpool Waters 100/2424	The comprehensive redevelopment of up to 60 hectares of former dock land comprising a maximum of 305,479sqm office space, 752,675 sqm of residential space accommodating 9,152 homes, 69,735 sqm of hotel and conference facilities, 24,696 sqm comparison retailing, 7,768 sqm convenience retailing, 8,588 sqm financial and professional services, 33,638 sqm cafes and restaurants, 20,210 sqm drinking establishments, 9,764 sqm of non-residential institutions, 33,299 sqm assembly and leisure, and public open spaces.	Outline permission granted June 2013
Hive City (A06) 20F/1203	To erect residential tower (C3) consisting of 278 apartments, ground floor commercial (A1/A3/A4), residential amenity areas, cycle and vehicle parking with associated hard and soft landscaping.	Pending determination
Plaza 1821 (A05) 17F/0913	To erect 15 storey residential tower comprising 105 apartments (C3 Use) and two ground floor commercial units (A1/A3/A4 Use) with 26 external car parking spaces and landscaping works	Completed June 2020
The Lexington (A04) 16F/1370 & 17F/2056	To erect 35 storey residential block with 325 private rented sector apartments.	On site for completion 2021.
Cruise Liner Terminal 170/3230 & 19RM/1037	Hybrid application comprising Full application for the controlled dismantling and removal of the building shown on the Demolition Parameter Plan (Plan No.2), redundant mooring dolphins and dilapidated structures including the (timber framed and concrete decked) Princes Jetty in the River Mersey and;	Permission granted April 2019. Initial construction underway with completion anticipated 2023.

NAME / ADDRESS / PLANNING REF	DESCRIPTION	STATUS
	Outline planning application for the construction of a new Cruise Liner Terminal (to cater for an increase in the number of cruise passengers) on a suspended deck structure in the River Mersey at the Princes Jetty site, together with the erection of a vehicular link span bridge and pedestrian bridge/walkways	
Isle of Man Ferry Terminal 18F/3231 & 18L/3232	To construct new Ferry Terminal for the Isle Of Man Government to replace existing ferry landing stage located at Pier Head with associated ancillary structures and associated marine equipment and works on land at Princes Half-Tide Dock with associated servicing and delivery via planned link road from Waterloo Road.	Permission granted April 2019. Completion 2022 anticipated.
"The Parks"- Phase 508F/0247	113 new homes	Currently on site for build out.
Land Bounded by Walton Lane, Bullens Road and Diana Street 18F/1316	To erect part four/part five storey block comprising 106no. flats with associated car parking, landscaping and ancillary works	Awaiting signing of legal agreement since August 2018

In addition to the above developments, the following four schemes were included in the initial list of cumulative developments.

- "Clock Tower Drive", off Rice Lane, Walton (former Walton Hospital Site) (Planning ref: 15F/1129);
- "Claremont Gardens", Westminster Road, Sellar Street, Eastby Road (Planning ref: 11F/1146);
- Project Jennifer, Great Homer Street (Planning ref: 13RM/1269); and
- Cemex Uk Ltd, Regent Road (Planning ref: 16F/2999).

However, it was subsequently determined that these schemes have now been completed, thus forming part of the baseline environment, and are not included as cumulative developments.

The potential for each individual scheme listed above to produce inter-project cumulative environmental effects alongside the proposed development will depend on the nature of the effect in question. As such, although the complete list of cumulative schemes in the table above has been considered in the EIA, not every scheme has been included in the inter-development cumulative assessment in every technical chapter. Where individual cumulative schemes have been scoped out of

consideration for a particular topic, justification has been provided in the relevant chapter.

2.14 APPROACH TO THE DECEMBER 2020 ES REVISIONS

As discussed in Section 2.6, in response to planning application consultation comments and the resulting design changes, the ES and its technical assessments have been revised.

Four criteria were taken into account when establishing what scale of revision was required for each technical assessment:

1. The relevance and scale of the proposed development amendments (including construction methodology) – in particular, whether these differ from the parameters that were previously assessed and, if there is a change, whether it would affect the key elements of the scheme's design that were assessed by a particular technical topic;
2. Interim updates in legislation, policy, or guidance – whether any of these have taken place since the application's submission;
3. The validity of the baseline data – including new cumulative schemes that have been submitted for planning before the Club's application was validated, and any cumulative applications that have come forward post-validation given the design amendments; and
4. Statutory consultee comments and the appropriateness of the previously identified mitigation measures – as statutory consultee comments have been received, updates and amendments to some assessment work are required, if these also have any implications on mitigation measures this will also need to be reviewed.

Based on the outcome of this review exercise, it was established that some assessments required more comprehensive revisions, while others only required more minimal changes. To account for this variation, three levels of revision were proposed, with chapters subject to Level 1 revision requiring minimal changes, and chapters subject to Level 2 and 3 changes requiring more substantial changes. The levels and their respective criteria are set out in the Table 2.7.

Table 2.7
December 2020 Assessment Update Level Criteria

LEVEL OF UPDATE	CRITERIA
Level 1: Only a professional statement is required in the ES chapter	<ul style="list-style-type: none">■ Proposed development scheme design changes are of no relevance to assessment;■ There have been no relevant updates to legislation/policy etc. since previous submission;■ There have been no changes to baseline data and new cumulative schemes will not have cumulative interactions with proposed development;

EIA METHODOLOGY

LEVEL OF UPDATE	CRITERIA
	<div><div></div><div>No or limited statutory consultee comments to respond to (response limited to previously advised clarification points that have already been agreed, responses provided in appended correspondence), mitigation measures remain valid.</div></div>
Level 2: Limited Technical Assessment required and a Professional Statement included in ES chapter	Limited technical assessment is required that does not change submitted ES’s significance of effect findings, assessment requirement driven by any of the four criteria detailed in the text above this table.
Level 3: Full Re-assessment and New ES chapter provided	Substantial changes required against any of the above four criteria predicating a fully updated chapter for ease of review and understanding of the reader.

The level of update undertaken for each technical assessment is detailed in the respective technical ES chapter.

The structure of this revised ES follows that of the previous ES, with revisions made, as necessary, throughout the documents. Table 2.8 sets out the structure of the revised ES and the key amends made to each volume/chapter.

Table 2.8
Amendments Made to the ES Chapters

ES CHAPTER	DETAILS OF AMENDMENTS
Volume I	
NTS	The Non-Technical Summary has been revised to take account of the technical assessment updates.
Volume II; ES Main Volume	
Chapter 1 Introduction	Additional text has been added providing context to the updates to the application and clearly stating where chapters have been wholly updated or have had a lesser revision.
Chapter 2 EIA Methodology	Amendments have been made to address the assessment approach to the changes outlined in this table, however including the relevant information from the submitted ES for all other methodology aspects where no changes were required.
Chapter 3 Application Site & Proposed Development	Amended to set out the revised description of the proposed development
Chapter 4 Construction Methodology	Updates made to reflect the changes in construction methodology as the understanding of the proposed construction process has developed.
Chapter 5 Alternatives and Design Evolution	Updated to address the rationale behind the December 2020 design changes and to include the March 2020 scheme iteration as an

ES CHAPTER	DETAILS OF AMENDMENTS
	alternative.
Chapter 6 Planning Policy Context	Reviewed to account for any updates to planning policy since the initial planning submission.
Chapter 7 to 15 Technical topics	Full chapters form the previously submitted ES, with Level 1, Level 2 or Level 3 updated assessments where required for all technical topics.
Chapter 16 Intra-Development Cumulative Effects	Revised to account for any changes in effects reported in the technical assessments.
Chapter 17 Residual Effects & Summary	Revised to reflect any new findings in terms of significant effects.
Volume 3	
Technical Appendices	Updated as required and where referenced in the Volume 2 Chapters.

2.15 OVER-RIDING DIFFICULTIES

No over-riding difficulties, such as technical problems or lack of know-how, were encountered during the preparation of this ES that significantly reduces its ability to fulfil its purpose.

Any minor difficulties experienced and/or assumptions made during the completion of individual surveys/assessments are discussed in the methodology section of the relevant technical chapter(s) and the relevant technical appendices.

2.16 WORKS CITED

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