

Appendix 2.2: EIA Scoping Opinion

Enquiries to: Felicity Collins
Contact No: 0151 233 1103
Email: felicity.collins@liverpool.gov.uk
Enquiry Ref: 20EIA/0356
(Please quote at all times)
Date: 6th February 2020



Andrew Malcomson
Turley
40 Queen Square
Bristol
BS1 4QP

Dear Andrew,

**Proposed construction of the new Anfield Road Stand, and use of the whole of Anfield Stadium for other events on a permanent basis.
Liverpool Football Club, Anfield Stadium.
Environmental Impact Assessment Scoping Report.**

I refer to your request that the Council adopt a formal Screening Opinion under Regulation 15 of the Town and Country Planning (Environmental Impact Assessment) Regulations 2017, in respect of proposals for Anfield Stadium. The stadium is located between Walton Breck Road and Anfield Road/ Stanley Park, and by the rear of properties on Skerries Road and Alroy Road.

The proposed development is to be the subject of a full detailed planning application, which you have detailed at Chapter 4 of the submitted EIA Scoping Report. The proposal comprises two main elements: a new Anfield Road Stand, with associated landscaping; and, permanent use of the whole stadium for events.

- **Anfield Road Stand** – The works described include the necessary site preparation and construction compound arrangements, and works to deliver the new stand at Anfield Road (including demolition). This would increase seating capacity from 8,962 to approximately 16,000 along with new associated facilities.
- **Other Events** - You have advised that the applicant, Liverpool Football Club, has temporary permission to 6 events on the pitch in the closed football season (mid-May to end-June); which permission expires in 2021. Permission is being sought for the permanent and unrestricted permission to hold any number of concerts and major events on the pitch for the same period. Permission is also sought for the stadium to host other sports (such as Gaelic games and American football) during international breaks in the football season.

LFC secured planning permissions in 2014, and subsequently 2016, to to expand capacity through expansion of the Main Stand (full permission) and the Anfield Road Stand (in outline - siting approved, all other matters reserved). The Main Stand development has been completed (September 2016). Reserved matters were not submitted for the Anfield Road Stand and that planning permission has since expired.

Liverpool City Council

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Pre App Response



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The majority of the proposed development site is washed over in the UDP as Primarily Residential, with the area between Anfield Road and Stanley Park being within the Stanley Park Conservation Area. The park itself is a designated Historic Park.

The proposed scheme falls under Schedule 2 of the EIA Regulations. Whilst EIA is not compulsory for Schedule 2 projects, you have advised that it is considered that the size and nature of the proposed scheme, a number of likely significant environmental effects have been identified.

A Scoping Report (Turley, January 2020) has been submitted with the request for a formal Scoping Opinion from LCC in accordance with Regulation 15 of the Town and Country Planning (Environmental Impact Assessment) Regulations 2017. The Scoping Report provides a description of the site, a high level description of the proposed scheme, and details of topics considered to be 'not significant', and an outline of the likely significant effects on the environment and the assessment methodologies to assess those effects. The methodology for assessment of cumulative effects is included.

The topics where likely significant effects have been identified are:

- Socio-economics and Human Health
- Townscape and Visual
- Built Heritage
- Biodiversity
- Transport
- Noise and Vibration
- Climatic Effects (Wind Microclimate)

The proposed EIA covers the main elements required by the regulations and provides a good level of detail on how the assessment will be carried out and the topics scoped out appear appropriate for the reasons provided.

The Scoping Report has been circulated to statutory consultees for their consideration. As you will see, consultees have responded positively and confirmed the approach set out in your scoping submission is generally acceptable, with exceptions as follows.

Amendments to Scope - Townscape and Visual

Concerns have been raised by LCC's Conservation Officer, in relation to the proposed scoping of the assessment of impacts on the setting of the listed historic landscapes of Stanley Park and Anfield Cemetery and the listed buildings within those sites. The new stand will be very noticeable from the centre of Anfield Cemetery, particularly around the listed Catacombs site.

1. We do not agree with the conclusion that *'There are no townscape environmental designations covering the Site or immediate context, therefore effects on environmental designations are unlikely to be considered significant and will not be considered within the EIA or reported in the ES.'* (Scoping Report, Para 7.6, Townscape effects on environmental designations during construction and operational phases)

Effects on the listed historic landscapes of Stanley Park and Anfield Cemetery need to be considered within the Townscape and Visual Assessment (Table 7.1) within the ES. Likely significant effects need to be included, with consideration of mitigation measures that may be possible, such as through materials and design (accepting that such measures would not mitigate for the impact of the scale and massing of the structure).

2. We have reviewed the viewpoints for the TVIA with the landscape architect (Gillian Webb, Planit IE) and agreed that the View from Walton Hall Park, North of Walton Hall Avenue is to be included in the assessment (Scoping Report, Para 7.9, Visual Effects from local viewpoints during construction and operational phases).

General Advice

You have been provided with copies of the responses received during the scoping period, and these are also attached for your information at Appendix 1. Within the responses, additional general and specific advice relating to the proposal has been given by a number of the consultees. Whilst this advice does not alter the proposed scope of the Environmental Impact Assessment, I trust you can circulate it to the team and to be taken into account as the project progresses.

Scoping Opinion Adopted

In summary, I can confirm that in accordance with Regulation 15 (Part 4) of the Town and Country Planning (Environmental Impact Assessment) Regulations 2017, Liverpool City Council as Local Planning Authority has adopted this Scoping Opinion in relation to the Environmental Impact of the proposed construction of the new Anfield Road Stand and proposed use of the whole of Anfield Stadium for other events on a permanent basis.

The Local Planning Authority is satisfied the information presented in the Scoping Report, subject to the updated Transport Scope (15th January 2020) and the inclusions detailed in this letter, provides an acceptable basis for preparing an ES to support an application for this development.

This view has been adopted by the Local Planning Authority as a formal Scoping Opinion in accordance with the requirements of the regulations and a copy of this letter has been placed on Part 1 of the Planning Register as part of the Local Planning Authority's application records.

Yours sincerely,



Felicity Collins
Special Projects Officer

c.c. (by e mail):

Julian Clarke - Natural England

Ross Brazier – Historic England

Stephen Robson – Lancashire Gardens Trust

Lucy Atkinson - Merseyside Environmental Advisory Service

Andy Davies - Environment Agency

Planning Admin Team – Sport England

Planning Liaison - United Utilities

Appendix 1: LFC Anfield Road Stand and Events EIA scoping

- Consultation responses

External Consultations:

Natural England	See attached correspondence
MEAS	See attached correspondence
Environment Agency	See attached correspondence
Historic England	See attached correspondence
Sport England	See attached correspondence
The Gardens Trust	See attached correspondence
United Utilities	No response received

Liverpool City Council Inter-departmental and Intra-departmental Consultations:

Discipline	Scoping Response:	Proposal advice/ comments
Highways Development Control	Highways is in agreement that the EIA scoping as proposed is considered satisfactory.	Comment in relation to the Transport Assessment (outside the EIA): The revised scoping note (dated 15th January 2020) prepared by Mott MacDonald, provides satisfactory methodology and contains suitable information regarding the steps to be taken to enable appropriate assessment of any traffic related impacts due to the development of the Anfield Road Stand Expansion proposals.
Highways Drainage	The relevant sections of the document have been checked through and it is considered sufficiently comprehensive at this stage.	Appendix 1 - Record of Consultation there is no reference in the Water Resources, Flood Risk and Drainage section to any meetings held with LLFA. This might have been useful in establishing surface water discharge requirements, which may well be different to United Utilities who were directly consulted. This is a complex application so it will not be possible to fully assess flow discharge rates until more detailed information is provided, which will probably be at the time of a full application. Information provided which may be of use for the drainage design and also for information required for a full planning application.
Environmental Health – Contamination	There are no comments from the Contaminated Land team on this Scoping report at this time.	Request to continue to be included in pre-application discussions.

Environmental Health – Air Quality	<p>The following documents submitted with this application have been reviewed: <i>Turley – Anfield Road Stand, Liverpool Environmental Impact Assessment (EIA) Scoping Report (ref: LIVM3025; date: 6 January 2020)</i></p> <p>The Scoping Report states that Air Quality is a topic area for which no likely significant environmental effects have been identified. This is because dust and air quality impacts during the construction phase will be temporary in nature and can be addressed by a Construction Environmental Management Plan (CEMP). With regards the operational phase, the increase in stadium capacity is not expected to cause an increase in road traffic in the vicinity of the Site.</p> <p>Agree that Air Quality can be scoped out the EIA.</p>	Planning application to be accompanied by a standalone air quality assessment and a CEMP.
Environmental Health - Noise	Noise & Vibration section of the submitted Scoping Report is acceptable.	Advice provided at meeting of 20th January 2020 by Ian Rushforth, Environmental Health Officer, confirmed that an unrestricted events permission will not be acceptable. The club will be required to define parameters for event frequency and type in the application, in order that noise and vibration impacts can be adequately assessed (as well as other amenity and highways matters).
Tree Specialist	No comment on EIA scope.	In the absence of any mitigation proposals objects to the loss of protected and Council owned trees.
Conservation Specialist	<p>Require inclusion of the assessment of the historic landscape of Stanely Park and Anfield Cemetery within the Townscape and Visual Assessment.</p> <p>Agreed that the scope of the Built Heritage assessment is adequate.</p>	<p>Advised that the potential for mitigation will be limited and an application will need to address the proposal in the light of the requirements of NPPF paragraph 196. <i>“Where a development proposal will lead to less than substantial harm to the significance of a designated heritage asset, this harm should be weighed against the public benefits of the proposal including, where appropriate, securing its optimum viable use”.</i></p>

Date: 14 January 2020
Our ref: 305323
Your ref: LIV3025



Liverpool City Council
Felicity.Collins@liverpool.gov.uk

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Electra Way
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Cheshire
CW1 6GJ

BY EMAIL ONLY

T 0300 060 3900

Dear Sir or Madam,

Environmental Impact Assessment Scoping consultation (Regulation 15 (4) of the Town & Country Planning EIA Regulations 2017):
Location: Liverpool Football Club, Anfield Road Stand

Thank you for your consultation dated 7th January 2020 and received by Natural England on 7th January 2020

Natural England is a non-departmental public body. Our statutory purpose is to ensure that the natural environment is conserved, enhanced, and managed for the benefit of present and future generations, thereby contributing to sustainable development.

The scoping request is for a proposal that does not appear, from the information provided, to affect any nationally designated geological or ecological sites (Ramsar, SPA, SAC, SSSI, NNR) or landscapes (National Parks, AONBs, Heritage Coasts, National Trails), or have significant impacts on the protection of soils (particularly of sites over 20ha of best or most versatile land), nor is the development for a mineral or waste site of over 5ha.

At present therefore it is not a priority for Natural England to advise on the detail of this EIA. We would, however, like to draw your attention to some key points of advice, presented in annex to this letter, and we would expect the final Environmental Statement (ES) to include all necessary information as outlined in Part 4 of the Town & Country Planning (Environmental Impact Assessment) Regulations 2017. If you believe that the development does affect one of the features listed in paragraph 3 above, please contact Natural England at consultations@naturalengland.org.uk, and we may be able to provide further information.

Yours faithfully

Julian Clarke
Consultations Team

Annex A – Advice related to EIA Scoping Requirements

1. General Principles

Schedule 4 of the Town & Country Planning (Environmental Impact Assessment) Regulations 2017 (as amended), sets out the necessary information to assess impacts on the natural environment to be included in an ES, specifically:

1. A description of the development, including in particular:
 - (a) a description of the location of the development;
 - (b) a description of the physical characteristics of the whole development, including, where relevant, requisite demolition works, and the land-use requirements during the construction and operational phases;
 - (c) a description of the main characteristics of the operational phase of the development (in particular any production process), for instance, energy demand and energy used, nature and quantity of the materials and natural resources (including water, land, soil and biodiversity) used;
 - (d) an estimate, by type and quantity, of expected residues and emissions (such as water, air, soil and subsoil pollution, noise, vibration, light, heat, radiation and quantities and types of waste produced during the construction and operation phases.
2. A description of the reasonable alternatives (for example in terms of development design, technology, location, size and scale) studied by the developer, which are relevant to the proposed project and its specific characteristics, and an indication of the main reasons for selecting the chosen option, including a comparison of the environmental effects.
3. A description of the relevant aspects of the current state of the environment (baseline scenario) and an outline of the likely evolution thereof without implementation of the development as far as natural changes from the baseline scenario can be assessed with reasonable effort on the basis of the availability of environmental information and scientific knowledge.
4. A description of the factors specified in regulation 4(2) likely to be significantly affected by the development: population, human health, biodiversity (for example fauna and flora), land (for example land take), soil (for example organic matter, erosion, compaction, sealing), water (for example hydromorphological changes, quantity and quality), air, climate (for example greenhouse gas emissions, impacts relevant to adaptation), material assets, cultural heritage, including architectural and archaeological aspects, and landscape.
5. A description of the likely significant effects of the development on the environment resulting from, inter alia:
 - (a) the construction and existence of the development, including, where relevant, demolition works;
 - (b) the use of natural resources, in particular land, soil, water and biodiversity, considering as far as possible the sustainable availability of these resources;
 - (c) the emission of pollutants, noise, vibration, light, heat and radiation, the creation of nuisances, and the disposal and recovery of waste;
 - (d) the risks to human health, cultural heritage or the environment (for example due to accidents or disasters);
 - (e) the cumulation of effects with other existing and/or approved projects, taking into account any existing environmental problems relating to areas of particular environmental importance likely to be affected or the use of natural resources;
 - (f) the impact of the project on climate (for example the nature and magnitude of greenhouse gas emissions) and the vulnerability of the project to climate change;
 - (g) the technologies and the substances used. The description of the likely significant effects on the factors specified in regulation 4(2) should cover the direct effects and any indirect, secondary, cumulative, transboundary, short-term, medium-term and long-term, permanent and temporary, positive and negative effects of the development. This description should take into account the environmental protection objectives established at Union or Member State level which are relevant to the project, including in particular those established under Council Directive 92/43/EEC (a) and Directive 2009/147/EC(b).

6. A description of the forecasting methods or evidence, used to identify and assess the significant effects on the environment, including details of difficulties (for example technical deficiencies or lack of knowledge) encountered compiling the required information and the main uncertainties involved.
7. A description of the measures envisaged to avoid, prevent, reduce or, if possible, offset any identified significant adverse effects on the environment and, where appropriate, of any proposed monitoring arrangements (for example the preparation of a post-project analysis). That description should explain the extent, to which significant adverse effects on the environment are avoided, prevented, reduced or offset, and should cover both the construction and operational phases.
8. A description of the expected significant adverse effects of the development on the environment deriving from the vulnerability of the development to risks of major accidents and/or disasters which are relevant to the project concerned. Where appropriate, this description should include measures envisaged to prevent or mitigate the significant adverse effects of such events on the environment and details of the preparedness for and proposed response to such emergencies.

2. Biodiversity and Geology

2.1. Ecological Aspects of an Environmental Statement

Natural England advises that the potential impact of the proposal upon features of nature conservation interest and opportunities for habitat creation/enhancement should be included within this assessment in accordance with appropriate guidance on such matters. [Guidelines for Ecological Impact Assessment \(EclA\)](#) have been developed by the Chartered Institute of Ecology and Environmental Management (CIEEM) and are available on their website.

EclA is the process of identifying, quantifying and evaluating the potential impacts of defined actions on ecosystems or their components. EclA may be carried out as part of the EIA process or to support other forms of environmental assessment or appraisal.

The National Planning Policy Framework ([NPPF](#)) sets out guidance in paragraphs 170-171 and 174-177 on how to take account of biodiversity interests in planning decisions and the framework that local authorities should provide to assist developers.

2.2. Internationally and Nationally Designated Sites

Natural England undertakes an initial assessment of all development consultations, by determining whether the location to which they relate falls within geographical 'buffer' areas within which development is likely to affect designated sites. The proposal is located outside these buffer areas and therefore appears unlikely to affect an Internationally or Nationally designated site. However, it should be recognised that the specific nature of a proposal may have the potential to lead to significant impacts arising at a greater distance than is encompassed by Natural England's buffers for designated sites. The ES should therefore thoroughly assess the potential for the proposal to affect designated sites, including Special Areas of Conservation (SAC), Special Protection Areas (SPA), Ramsar sites and Sites of Special Scientific Interest (SSSI). Should the proposal result in an emission to air or discharge to the ground or surface water catchment of a designated site then the potential effects and impact of this would need to be considered in the Environmental Statement

Local Planning Authorities, as competent authorities under the provisions of the Conservation of Habitats and Species Regulations 2017 (as amended), should have regard to the Habitats Regulations Assessment process set out in Regulation 63 of the Habitats Regulations in their determination of a planning application. Should a Likely Significant Effect on a European/Internationally designated site be identified or be uncertain, the competent authority (in this case the Local Planning Authority) may need to prepare an Appropriate Assessment, in addition to consideration of impacts through the EIA process.

Statutory site locations can be found at www.magic.gov.uk. Further information concerning particular statutory sites can be found on the [Natural England website](#).

2.3. Protected Species

The ES should assess the impact of all phases of the proposal on protected species. Records of protected species should be sought from appropriate local biological record centres, nature conservation organisations, groups and individuals; and consideration should be given to the wider context of the site for example in terms of habitat linkages and protected species populations in the wider area, to assist in the impact assessment.

The conservation of species protected by law is explained in Part IV and Annex A of Government Circular 06/2005 *Biodiversity and Geological Conservation: Statutory Obligations and their Impact within the Planning System*. The area likely to be affected by the proposal should be thoroughly surveyed by competent ecologists at appropriate times of year for relevant species and the survey results, impact assessments and appropriate accompanying mitigation strategies included as part of the ES.

Natural England has adopted [standing advice](#) for protected species. It provides a consistent level of basic advice which can be applied to any planning application that could affect protected species. It also includes links to guidance on survey and mitigation.

Natural England does not hold comprehensive information regarding the locations of species protected by law, but advises on the procedures and legislation relevant to such species.

2.4. Regionally and Locally Important Sites

The ES should thoroughly assess the impact of the proposals on non-statutory sites, for example Local Wildlife Sites (LoWS), Local Nature Reserves (LNR) and Regionally Important Geological and Geomorphological Sites (RIGS). Natural England does not hold comprehensive information on these sites. We therefore advise that the appropriate local biological record centres, nature conservation organisations, Local Planning Authority and local RIGS group should be contacted with respect to this matter.

2.5. Biodiversity Action Plan Habitats and Species

The ES should thoroughly assess the impact of the proposals on habitats and/or species listed in the UK Biodiversity Action Plan (BAP). These Priority Habitats and Species are listed as 'Habitats and Species of Principal Importance' within the England Biodiversity List, recently [published](#) under the requirements of S14 of the Natural Environment and Rural Communities (NERC) Act 2006. Section 40 of the NERC Act 2006 places a general duty on all public authorities, including local planning authorities, to conserve and enhance biodiversity. Further information on this duty is available in the Defra publication '[Guidance for Local Authorities on Implementing the Biodiversity Duty](#)'.

Government Circular 06/2005 states that BAP species and habitats, 'are capable of being a material consideration...in the making of planning decisions'. Natural England therefore advises that survey, impact assessment and mitigation proposals for Habitats and Species of Principal Importance should be included in the ES. Consideration should also be given to those species and habitats included in the relevant Local BAP.

The record centre for the relevant Local Authorities should be able to provide the relevant information on the location and type of BAP habitat for the area under consideration.

3. Landscape, Access and Recreation

3.1. Landscape and Visual Impacts

The consideration of landscape impacts should reflect the approach set out in the *Guidelines for Landscape and Visual Impact Assessment* (Landscape Institute and the Institute of Environmental Assessment and Management, 2013, 3rd edition), the *Landscape Character Assessment Guidance for England and Scotland* (Scottish Natural Heritage and The Countryside Agency, 2002) and good practice. The assessment should also include the cumulative effect of the development with other relevant existing or proposed developments in the area. In this context Natural England would expect

the cumulative impact assessment to include those proposals currently at Scoping stage. Due to the overlapping timescale of their progress through the planning system, cumulative impact of the proposed development with those proposals currently at Scoping stage would be likely to be a material consideration at the time of determination of the planning application.

The assessment should refer to the relevant [National Character Areas](#) which can be found on our website. Links for Landscape Character Assessment at a local level are also available on the same page.

3.2. Access and Recreation

The ES should include a thorough assessment of the development's effects upon public rights of way and access to the countryside and its enjoyment through recreation. With this in mind and in addition to consideration of public rights of way, the landscape and visual effects on Open Access land, whether direct or indirect, should be included in the ES.

Natural England would also expect to see consideration of opportunities for improved or new public access provision on the site, to include linking existing public rights of way and/or providing new circular routes and interpretation. We also recommend reference to relevant Right of Way Improvement Plans (ROWIP) to identify public rights of way within or adjacent to the proposed site that should be maintained or enhanced.

4. Land use and soils

Impacts from the development should be considered in light of the Government's policy for the protection of the best and most versatile (BMV) agricultural land as set out in paragraph 170 and 171 of the NPPF. We also recommend that soils should be considered under a more general heading of sustainable use of land and the valuing of the ecosystem services they provide as a natural resource, also in line with paragraph 170 of the NPPF.

Soil is a finite resource that fulfils many important functions and services (ecosystem services) for society; for instance as a growing medium for food, timber and other crops, as a store for carbon and water, as a reservoir of biodiversity and as a buffer against pollution. It is therefore important that the soil resources are protected and used sustainably. The Natural Environment White Paper (NEWP) '*The Natural Choice: securing the value of nature*' (Defra, June 2011), emphasises the importance of natural resource protection, including the conservation and sustainable management of soils and the protection of BMV agricultural land.

Development of buildings and infrastructure prevents alternative uses for those soils that are permanently covered, and also often results in degradation of soils around the development as result of construction activities. This affects their functionality as wildlife habitat, and reduces their ability to support landscape works and green infrastructure. Sealing and compaction can also contribute to increased surface run-off, ponding of water and localised erosion, flooding and pollution.

Defra published a Construction [Code of Practice for the sustainable use of soils on construction sites](#) (2009). The purpose of the Code of Practice is to provide a practical guide to assist anyone involved in the construction industry to protect the soil resources with which they work.

As identified in the NPPF new sites or extensions to new sites for Peat extraction should not be granted permission by Local Planning Authorities or proposed in development plans.

General advice on the agricultural aspects of site working and reclamation can be found in the Defra [Guidance for successful reclamation of mineral and waste sites](#).

5. Air Quality

Air quality in the UK has improved over recent decades but air pollution remains a significant issue; for example over 97% of sensitive habitat area in England is predicted to exceed the critical loads for ecosystem protection from atmospheric nitrogen deposition ([England Biodiversity Strategy](#), Defra 2011). A priority action in the England Biodiversity Strategy is to reduce air pollution impacts on biodiversity. The planning system plays a key role in determining the location of developments which

may give rise to pollution, either directly or from traffic generation, and hence planning decisions can have a significant impact on the quality of air, water and land. The assessment should take account of the risks of air pollution and how these can be managed or reduced. Further information on air pollution impacts and the sensitivity of different habitats/designated sites can be found on the Air Pollution Information System (www.apis.ac.uk). Further information on air pollution modelling and assessment can be found on the Environment Agency website.

6. Climate Change Adaptation

The [England Biodiversity Strategy](#) published by Defra establishes principles for the consideration of biodiversity and the effects of climate change. The ES should reflect these principles and identify how the development's effects on the natural environment will be influenced by climate change, and how ecological networks will be maintained. The NPPF requires that the planning system should contribute to the enhancement of the natural environment "by establishing coherent ecological networks that are more resilient to current and future pressures" ([NPPF](#) Paras 170 and 174), which should be demonstrated through the ES.

Liverpool City Council
Planning and Building Control
Cunard Building Water Street
Liverpool
L3 1DS

Our ref: SO/2020/119954/01-L01
Your ref: LIV3025
Date: 09 January 2020

FAO: Felicity Collins

Dear Ms Collins

LIV3025 – FORMAL REQUEST FOR EIA SCOPING OPINION - ANFIELD ROAD STAND [JANUARY 2020]

ANFIELD ROAD, LIVERPOOL, L4 0TH

Thank you for requesting an EIA scoping opinion from the Environment Agency regarding the above development proposal. This request was received in office on the 7th January 2019.

For the purpose of this EIA opinion request, we have reviewed the following document:

Environmental Impact Assessment (EIA) Scoping Report - Anfield Road Stand, Liverpool. Prepared by Turley - [January 2020]

Environment Agency Position

Having reviewed the above document, we are in agreement with the proposed scope of the Environmental Statement for the redevelopment of the site in so far as it relates to matters within the remit of the Environment Agency.

Advice to Applicant / Agent

We recommend the developer refers to our published 'Guiding Principles for Land Contamination' which outline the approach which should be adopted when managing this site's risks to the water environment.

We also advise that you consult with your Environmental Health/Environmental Protection Department for advice on generic aspects of land contamination management. Where planning controls are considered necessary, we recommend that the environmental protection of controlled waters is considered alongside any human health protection requirements. This approach is supported by paragraph 170 of the National Planning Policy Framework.

We note that proposed activities at the site may result in the import/export of waste material and recommend the following:

Waste on-site

The CL:AIRE Definition of Waste: Development Industry Code of Practice (version 2) provides operators with a framework for determining whether or not excavated material

arising from site during remediation and/or land development works is waste or has ceased to be waste. Under the Code of Practice:

- excavated materials that are recovered via a treatment operation can be reused on-site providing they are treated to a standard such that they are fit for purpose and unlikely to cause pollution
- treated materials can be transferred between sites as part of a hub and cluster project
- some naturally occurring clean material can be transferred directly between sites

Developers should ensure that all contaminated materials are adequately characterised both chemically and physically, and that the permitting status of any proposed on-site operations are clear. If in doubt, the Environment Agency should be contacted for advice at an early stage to avoid any delays.

We recommend that developers should refer to:

- the [position statement](#) on the Definition of Waste: Development Industry Code of Practice
- The [waste management](#) page on GOV.UK

Waste to be taken off site

Contaminated soil that is (or must be) disposed of is waste. Therefore, its handling, transport, treatment and disposal are subject to waste management legislation, which includes:

- Duty of Care Regulations 1991
- Hazardous Waste (England and Wales) Regulations 2005
- Environmental Permitting (England and Wales) Regulations 2016
- The Waste (England and Wales) Regulations 2011

Developers should ensure that all contaminated materials are adequately characterised both chemically and physically in line with British Standard BS EN 14899:2005 'Characterization of Waste - Sampling of Waste Materials - Framework for the Preparation and Application of a Sampling Plan' and that the permitting status of any proposed treatment or disposal activity is clear. If in doubt, the Environment Agency should be contacted for advice at an early stage to avoid any delays.

If the total quantity of hazardous waste material produced or taken off-site is 500kg or greater in any 12 month period, the developer will need to register with us as a hazardous waste producer. Refer to the [hazardous waste](#) pages on GOV.UK for more information.

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Should you have any queries regarding this response, then please do not hesitate to contact me.

Yours sincerely

Mr Andy Davies
Sustainable Places Advisor

Direct dial 02077140640

Direct e-mail andy.davies1@environment-agency.gov.uk



Historic England

Ms Felicity Collins
Liverpool City Council
Cunard Building
Water Street
Liverpool
L3 1AH

Direct Dial: 0161 2421417

Our ref: PL00660192

27 January 2020

Dear Ms Collins

Re: Liverpool Football Club ENVIRONMENTAL IMPACT ASSESSMENT (EIA)
SCOPING REPORT

Thank you for your email of 7th January 2020 consulting us about the above EIA Scoping Report.

This development could, potentially, have an impact upon a 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), we would expect the Environmental Statement to contain a thorough assessment of the likely effects which the proposed development might have upon those elements which contribute to the significance of these assets.

We would also expect the Environmental Statement to consider the potential impacts on non-designated features of historic, architectural, archaeological or artistic interest, since these can also be of national importance and make an important contribution to the character and local distinctiveness of an area and its sense of place. This information is available via the local authority Historic Environment Record (www.heritagegateway.org.uk) and relevant local authority staff.

We would strongly recommend that you involve the Conservation Officer and the archaeological staff at **Merseyside Archaeological and Environmental Services** 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 environment; the nature and design of any required mitigation measures; and opportunities for securing wider benefits for the future conservation and management of heritage assets.



SUITES 3.3 AND 3.4 CANADA HOUSE 3 CHEPSTOW STREET MANCHESTER M1 5FW

Telephone 0161 242 1416
HistoricEngland.org.uk



Historic England is subject to both the Freedom of Information Act (2000) and Environmental Information Regulations (2004). Any Information held by the organisation can be requested for release under this legislation.



Historic England

It is important that the assessment is designed to ensure that all impacts are fully understood. Section drawings and techniques such as photomontages are a useful part of this.

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 the 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 to subsidence of buildings and monuments.

We have the following comments to make regarding the content of the Scoping Report:

We are satisfied with the proposals put forward by the applicant's consultants and have discussed this on site with them.

If you have any queries about any of the above, or would like to discuss anything further, please contact me.

Yours sincerely,

Ross Brazier

Inspector of Historic Buildings and Areas

ross.brazier@HistoricEngland.org.uk

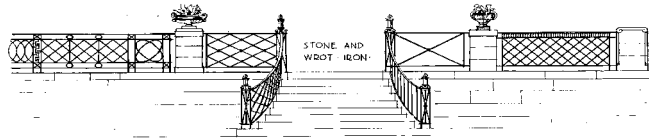


SUITES 3.3 AND 3.4 CANADA HOUSE 3 CHEPSTOW STREET MANCHESTER M1 5FW

Telephone 0161 242 1416
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Lancashire Gardens Trust
Conservation & Planning Group

28 January 2020

Your ref:

Planning Department
Liverpool City Council
Municipal Buildings
Dale Street
Liverpool L2 2DH

For the attention of Felicity Collins, Development Control Division
By email only to Felicity.Collins@liverpool.gov.uk

Dear Sir/Madam

EIA Scoping Report; Liverpool Football Club; Anfield Road Stand.
GT Reference: E19/1376

Thank you for consulting The Gardens Trust (GT) in its role as Statutory Consultee with regard to proposed development affecting a site listed by Historic England (HE) on their Register of Parks and Gardens in connection with the above. The Lancashire Gardens Trust (LGT) is a member organisation of the GT and works in partnership with it in respect of the protection and conservation of registered sites, and is authorised by the GT to respond on GT's behalf in respect of such consultations.

We have reviewed the Scoping Report, and also visited the site. Anfield Road Stand lies immediately adjacent to Stanley Park, a very important Grade II* Registered Park and Garden, together with a number of Grade II listed structures and buildings, recently benefitting from considerable investment and upgrading.

Whilst we support the underlying project in the continued development of Liverpool Football Club, we object to the inclusion of part of the Registered Park and Garden within the Red Line boundary in Figure 1.1. This area forms the south side of the Dahlia Walk, one of the major entrances to Stanley Park from Utting Avenue which is laid out as a formal designed avenue. The Red Line boundary intrudes into the Park in this location. We note Paragraph 4.36 states that tree losses will be minimised, indicating that construction activity will affect this area, although in paragraph 4.37 the railings are described to be retained. The boundary of the Registered Park and Garden should not be affected in any way. The avenue has symmetry and grandeur: it is an essential component in the overall design and should have a parallel row of trees framing it. Therefore the trees immediately adjacent to the boundary of the Park must be retained during any construction operations.

The development of land immediately adjacent to the Registered Park and Garden will have significant adverse visual effects on the setting and character of the Park. A comprehensive and effective mitigation scheme is required. Paragraph 4.61 makes mention of the intention of 'bringing the Park into the stadium environment through significant tree planting and greening'. The success of this will depend on the emerging scheme and will be judged on the extent to which the historic character of the Park is protected and enhanced.

A further area outlined within the Red Line lies within Stanley Park, north of the Dahlia Walk and is indicated for Site Welfare and Office Accommodation. Paragraph 4.3 describes this as a preferred location, pending agreement with LCC. We object to the siting of this facility within the Park as this will add to the interference with the Park users, and lead to requirement for servicing, access and other conflicts across the Dahlia Walk. There are a number of alternatives to this location, and the large area of fenced unused land with concrete bases at the rear of 45 Anfield Road appears more suitable, minimising conflict with Park users. We suggest that alternative locations are identified and pursued in preference to use of greenspace within the Park.

The character and setting of the Registered Park and Garden must be protected and maintained at all times, including safe access for the public.

The promise of the proposed Heritage Assessment and detailed Heritage Statement supporting the planning application is welcomed as described in Paragraph 8.9 and table 8.3 and we look forward to seeing evidence that this informs the EIA, and also formulation of the proposals.

If there are any matters arising from this letter please contact me by email conservation@lancsgt.org.uk.

Yours faithfully

Stephen Robson

S E Robson BSc BPhil MA(LM) DipEP CMLI MRTPI
Chair, Conservation & Planning Group

Merseyside Environmental Advisory Service
2nd Floor, Magdalen House
Trinity Road, Bootle, L20 3NJ
Director: Alan Jemmett, PhD, MBA

Enquiries: 0151 934 4951

Contact: Lucy Atkinson
Email: measdconsultations@sefton.gov.uk

DEVELOPMENT MANAGEMENT ADVICE

To: Felicity Collins
Organisation: Development Management
Liverpool Council

From: Lucy Atkinson

Your Ref: PREAPP
File Ref: LI20-001
W/P Ref: G:\MerseysideEAS\Development
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Date: 29th January 2020

Liverpool Football Club, Anfield Road Stand EIA Scoping Opinion

1. Thank you for consulting Merseyside Environmental Advisory Service in respect of this EIA Scoping Opinion. The proposals comprise remediation and landscaping at the former Festival Gardens site.
2. Having reviewed the application and supporting documentation, our advice is set out below in two parts.
 - Part One deals with issues of regulatory compliance, action required **prior to determination** and matters to be dealt with through planning conditions. Advice is only included here where action is required or where a positive statement of compliance is necessary for statutory purposes. Should the Council decide to adopt an alternative approach to MEAS Part 1 advice, I request that you let us know. MEAS may be able to provide further advice on options to manage risks in the determination of the application.
 - Part Two sets out guidance to facilitate the implementation of Part One advice and informative notes.

In this case Part One comprises paragraphs 3 to 17. There is no Part Two.

Part One

EIA Scoping

3. The applicant has submitted an EIA Scoping Opinion request (*EIA Scoping Report Anfield Road Stand, Liverpool Turley Ref: LVM3025 dated 6th January 2020*) which has been reviewed to form the basis of this memo.

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4. The Environmental Statement that supports the planning application should include the following sections as a minimum:
 - A non-technical summary;
 - Detailed scope of works;
 - Reference to key plans and legislation. It is essential that all relevant guidance and policies be complied with as appropriate;
 - Detailed baseline review (associated with all development issues); and
 - Detailed integrated assessment of all environmental impacts. This assessment needs to take into account the nature of impact (importance, magnitude and duration – quantified as appropriate), reversibility of impact, mitigation, monitoring measures (including reference to long-term management and maintenance measures/plans) and residual impacts.
5. It is important that the conclusions of the environmental impact assessment are transparent and that all information used to draw conclusions is clearly presented and objective (including survey/assessment results) to enable third party verification.
6. The applicant is proposing to consult best practice guidance to assist in preparing the EIA methodology and Environmental Statement (ES) - and this is welcomed.
7. The proposed structure of the ES is acceptable, although I will be guided by other technical specialists regarding the acceptability of individual proposed technical chapters.

Scoped out

8. The scoping report considers the following issues are not significant EIA issues:
 - Air quality;
 - Climate Change and Greenhouse Gases;
 - Water Resources, flood risk and drainage;
 - Ground contamination;
 - Archaeology;
 - Risk of Major Accidents and Disasters;
 - Waste;
 - Daylight, sunlight and overshadowing; and
 - Obtrusive light.
9. Subject to individual specialists being satisfied, I concur with this and consider these issues do not need to be addressed through individual chapters.

Cumulative Impacts

10. I welcome that it is proposed to include a summary of cumulative interactions in a separate chapter to include both an assessment of intra and inter-project effects. I will be guided by Liverpool Planning colleagues as to which other developments should be considered as part of a cumulative impact assessment.
11. Detailed comments on archaeology, ecology and waste are set out below.

Ecology

12. I have reviewed the Scoping Report and considered the project against the provisions of the EIA Regulations (including screening criteria presented in Schedule 3). Due to the nature of the proposals and the minimal nature of the habitats that will be lost I advise that EIA is not required in this case from an ecology perspective and can therefore be scoped out of the EIA.
13. An email query from Turley has enquired whether potential impacts to bats can be addressed as part of a formal application (Lauren Bagshaw (Turley), 2020, email to MEAS- '*EIA Scoping Report – Liverpool Football Club, Anfield Road Stand*', 7th January 2020). I advise ecological issues can be addressed during future planning applications.

Archaeology

14. Having reviewed the EIA Scoping Report produced by Turley (Jan 2020) and considered the project against the provisions of the EIA Regulations (including screening criteria presented in Schedule 3) and the relevant National Planning Practice Guidance, I accordingly consider that the proposals are unlikely to give rise to significant archaeological effects, and that EIA will therefore not be required on archaeological grounds.
15. Although archaeology can be scoped out of the EIA in this case, there are archaeological issues associated with the proposals that will need to be addressed through normal planning application procedures.
16. These issues are highlighted within the section 3.15 of the EIA Scoping Report and include potential below ground archaeological remains, which will be disturbed by the proposed development. These remains comprise the site of St Ann's Hill House (MME9852), a possible late 18th/early 19th century dwelling, recorded on the Merseyside Historic Environment Record.

Waste

17. Appendix 4 of the EIA Scoping Report is a Material Resource and Baseline Study (*Mott MacDonald 18 December 2019*). This includes an assessment of waste management capacity in the vicinity of the proposal and of likely waste generated. It concludes that there will be no significant effects from waste due to the small volume of construction material required for the scheme. However, it does indicate that a SWMP/CEMP will be prepared to consider sourcing, transport, use and disposal of materials. I concur with the conclusions, the SWMP/CEMP can be dealt with through normal planning procedures.

I would be pleased to discuss these issues further and to provide additional information in respect of any of the matters raised.

Lucy Atkinson

Environmental Appraisal and Support Services Team Leader

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Collins, Felicity

From: Planning North <Planning.North@sportengland.org>
Sent: 09 January 2020 13:35
To: Collins, Felicity
Subject: RE: EIA Scoping Report – Liverpool Football Club, Anfield Road Stand

Thank you for consulting Sport England.

Sport England considers that the impact of a development on sports facilities or activities would not normally fall within the scope of an Environmental Statement. Consequently we do not wish to comment on the Screening or Scoping Opinion consultation.

Any subsequent planning application should however consider the implications for sport in the context of NPPF Para's 96 and 97, local plan policy and any strategic evidence set out in local playing pitch and/or built facilities strategies within the normal supporting documentation for a planning application.

Sport England should be consulted on the planning application if it meets the statutory requirements contained within SI 2015/295 (development affecting playing fields) or the guidance for non-statutory consultation with Sport England contained within Planning Practice Guidance: Open Space, Sports and Recreation Facilities (Paragraph: 003).

General guidance on assessing the need to protect, enhance and provide sports facilities can be found by following the link below:

<https://www.sportengland.org/facilities-planning/planning-for-sport/planning-applications/>

If you need any further advice please do not hesitate to contact Sport England using the contact details below.

Yours sincerely,

Planning Admin Team

T: 020 7273 1777

E: Planning.north@sportengland.org

