

## 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 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 [1] [2], which implement Council Directive 2011/92/EU on the assessment of the effects of certain public and private projects on the environment and in accordance with the Marine Works (Environmental Impact Assessment) Regulations 2007 (1) (as amended in 2015 (2)) (hereafter, the "Marine EIA Regulations 2007").

### 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 15 May 2017 (Appendix 2.1).

The Scoping Report proposed that the following topics would be 'scoped in' for further consideration in the ES, as significant environmental effects are considered likely:

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

The Scoping Report proposed that the following topics would be 'scoped down' (i.e. included within the ES technical appendices but not meriting the preparation of a stand-alone technical chapter within the main volume). It was considered unlikely that these technical topics would exhibit significant environmental effects, but further assessment was required to satisfy planning requirements:

- Solid Waste Management.

A scoping response was received from MEAS on 23<sup>rd</sup> June 2017 stating they disagreed with the proposal to scope down the topic of Waste Management, however through subsequent correspondence between CBRE and MEAS in September 2017 (and subsequent further consultation with MEAS 21<sup>st</sup> August 2019 as detailed in Chapter 12 of this ES Volume), it was agreed that this topic was adequately covered elsewhere in the ES and should be scoped down. Further detail is provided in Table 2.1.

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

#### 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, including the Marine Management Organisation (MMO) for consideration under the Marine Works (Environmental Impact Assessment) Regulations 2007 (as amended). On 8 November 2017, LCC and the MMO issued a joint Scoping Opinion, and in accordance with the Coastal Concordat principles, LCC agreed to act as the lead authority for co-ordinating the requirements for the EIA and Habitats Regulations Assessment (HRA) for the proposed development. The Scoping Opinion and supporting documents are provided in Appendix 2.2, ES Volume III.

The scoping consultation responses are summarised in Table 2.1 below, which also indicates where these issues have been considered within the ES.

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Table 2.1  
Summary of Consultation Responses

CONSULTEE	COMMENTS	WHERE ADDRESSED
Liverpool City Council (8th November 2017)	Advised that the Scoping Report submitted on the 15 <sup>th</sup> May 2017 provided a suitable basis to undertake the necessary environmental impact assessment for the full planning application, subject to the additional matters set out by the MMO and consultees in the attached correspondence being suitably addressed.	N/A
Marine Management Organisation (MMO) (8th November 2017)	MMO agreed with the topics outlined in the Scoping Report and in addition recommended that the aspects in the following rows are considered further during the EIA and should be included in any resulting ES.	N/A
Marine Management Organisation (MMO) (8th November 2017)	<b>Nature Conservation</b> The report states in the ‘EIA Methodology’ that the proposed development site lies in close proximity to the Mersey Narrows & North Wirral Foreshore Special Protected Area (SPA) and Ramsar Site; the Dee Estuary Special Area of Conservation (SAC); the Ribble and Alt Estuaries SPA and Ramsar Site; the Sefton Coast SAC; and the Mersey Estuary SPA and Ramsar Site. In assessing the effects of the proposed development on these receptors, the MMO expects the ES to include potential impacts on any benthic species and/or habitats that these sites are designated to protect (and any other designated features within these sites). The potential impacts of underwater noise arising from construction activities should also be assessed for any sensitive receptors.	ES Volume II, Chapter 13; and ES Volume III, Appendix 13.1
Marine Management Organisation (MMO) (8th November 2017)	<b>Coastal Processes</b> The figures in Appendix A (document 1) display the footprint of the stadium, which is greater in extent than the BMD. The impact of building out into the River Mersey will need to be assessed within the ES, including consideration of how the new footprint (including construction work) might impact the local marine environment (e.g. accretion and scouring of sediments, sediment transport and suspended sediment plumes). The ES should consider the project in respect of storm surges and sea level rise.	ES Volume II, Chapter 11
Marine Management Organisation (MMO) (8th November 2017)	<b>Benthic Ecology</b> The MMO advise the possibility of releasing benthic non-native species present within Liverpool Docks (e.g. <i>Styela clava</i> , <i>Haliplanella lineata</i> and <i>Ficopotamus enigmaticus</i> ) into the wider marine environment is a key issue that requires assessment within the ES. While it is stated under the ‘Aquatic Ecology’ Baseline Conditions that dense populations of the blue mussel ( <i>Mytilus edulis</i> ) occur within a neighbouring dock, this species is not included in the section on ‘Key Issues and Requirements for Assessment’. <i>M. edulis</i> populations are known to mediate water quality in Liverpool Docks (i.e. reduce algal blooms and prevent subsequent anoxia and release of foul odours) by filter-feeding on phytoplankton (Wilkinson et al. 1996). The potential impacts of the proposed development on <i>M. edulis</i> populations within the Liverpool Dock complex should therefore be included as a key issue within the EIA. The MMO does not agree with the stated assumption that the sediment on the dock floor will be largely barren. Docks act as artificial lagoons and can therefore be useful for the conservation of lagoon specialist species. Indeed, several lagoon specialist benthic species have been recorded in Liverpool Docks (Allen et al. 1995). The impact of the proposed development on sediment-dwelling species in BMD and neighbouring docks should therefore be assessed in the ES. The report states that BMD will be dredged prior to infilling and that this material will possibly be disposed of at sea. If this procedure is undertaken, then the potential impacts of disposal on benthic communities at the disposal site should be considered in the ES. The report proposes both a Phase I and Phase II habitat survey will be conducted for the terrestrial component, but very little information is presented regarding how the aquatic ecology features are to be characterised. It is stated that “the assessment methodology will be based on the Guidelines for Ecological Impact Assessment in Britain and Ireland — Marine and Coastal (IEEM, 2010)”. These surveys must also include the acquisition of suitable data upon which the benthic ecology of the region can be characterised.	The potential impacts to benthic species are assessed in ES Volume II, Chapter 13; and ES Volume III, Appendix 13.1
Marine Management Organisation (MMO) (8th November 2017)	<b>Fish Ecology and Fisheries</b> The MMO advised that Atlantic salmon ( <i>Salmo salar</i> ) are known to be recolonising the River Mersey (Ikediashi et al., 2012) and migratory fish should be considered within the ES if they transit past the BMD site. They state ‘fish spawning and nursery grounds may be located proximal to the site. Sole ( <i>Solea solea</i> ), European sprat ( <i>Sprattus sprattus</i> ) and European plaice ( <i>Pleuronectes platessa</i> ) spawning grounds, as well as high intensity European herring nursery grounds ( <i>Clupea harengus</i> ) are all potentially found within the vicinity of the site (Ellis et al., 2012; Coull et al., 1998). Given the scale of the works the impacts on fish receptors may be limited, however consideration should be shown. The ES should describe fish habitat (including spawning and nursery grounds) and receptors in the proximity of the proposed works, followed by a concise assessment of the potential impacts on them. Where appropriate, justification and evidence that the works are unlikely to unfavourably affect these habitats, should be included in the ES.’	ES Volume II, Chapter 13; and ES Volume III, Appendix 13.1  ES Volume II, Chapter 4; and ES Volume III, Appendix 4.1

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	The MMO also requested that the ES should include clarification on how any fish present within the BMD site prior to and during works: dock clearance; dredging and boundary clearance, will be dealt with. With details on the potential removal of fish, if present, prior to infilling works.	
Marine Management Organisation (MMO) (8th November 2017)	<b>Dredging and Disposal</b> The MMO advise mitigation measures and methodologies for reducing sediment disturbance and contamination issues should be provided in detail in the ES. Details of dredge and disposal methodologies should be included within the ES and potential contaminant issues should be addressed. The report states that environmentally harmful contaminants, such as Tributyltin (TBT), are likely to be present in the dock sediments, and that there is potential for these contaminants to be released into the Mersey estuary, and wider marine environment, during silt removal and disposal. The potential effects of these contaminants on fish species and benthic organisms should be assessed in the ES.	ES Volume II, Chapter 10; and ES Volume III, Appendix 11.8
Marine Management Organisation (MMO) (8th November 2017)	<b>Underwater Noise</b> The MMO advise the underwater noise arising from the construction activities, and the potential impacts of the noise on sensitive marine receptors should be considered within the ES. Considering the location and nature of the works, potential impacts would be fairly localised.	ES Volume II, Chapter 13; and ES Volume III, Appendix 13.1
Marine Management Organisation (MMO) (8th November 2017)	<b>Baseline Assessments</b> The MMO advise appropriate references to support the aquatic ecology baseline assessments, and assessment of potential impacts on sensitive receptors, should be included within the ES.	ES Volume II, Chapter 13; and ES Volume III, Appendix 13.1
Merseyside Environmental Advisory Service (MEAS) (23rd June 2017)	Merseyside Environmental Advisory Service (MEAS) consider the submitted EIA Scoping Report satisfactorily addresses the issues that should be covered by the Environmental Statement and an appropriate basis for undertaking the EIA, subject to the following issues on specific topics/ES chapters being taken into account.	N/A
Merseyside Environmental Advisory Service (MEAS) (23rd June 2017)	<b>Archaeology</b> MEAS confirms that the approach to assessing archaeology issues posed by the proposed development are considered to be an appropriate means of quantifying the archaeological resource, assessing its significance and informing any mitigation required for the proposed development.	ES Volume II, Chapter 19; and ES Volume III, Appendix 19.1
Merseyside Environmental Advisory Service (MEAS) (23rd June 2017)	<b>Ecology and Habitats Regulations</b> MEAS advised the following should be considered in the ES: <ul style="list-style-type: none"><li>■ <b>Desktop study</b> <i>‘The proposed desktop study is to include consultation with the local biological record centre (Merseyside BioBank) which is welcome. The EIA Scoping Report refers to the use of aquatic ecology data from the NBN Gateway (now known as NBN Atlas). However, in accordance with the NBN Terms and Conditions, permission from the data provider will be required to use this information otherwise the data could not be relied upon during the determination of the planning application. ’</i></li><li>■ <b>Breeding birds</b> <i>‘The breeding bird survey is proposed to comprise a single visit in April 2017, two visits in May 2017 and a single visit in June 2017. Considering the scale of the proposals and potential impacts, weekly visits during the April to June period would have been preferable.</i> <i>There was a common tern nesting site is present at the adjacent Sandon half-tide dock in 2015 which will need to be considered as part of a breeding bird survey. The Liverpool Bay proposed SPA extension, which lies directly adjacent to the application site, includes foraging areas important for common tern, from the Mersey Narrows and North Wirral Foreshore SPA, during their breeding season.</i> <i>In addition to this, kittiwakes are known to breed on the outside of the Bramley Moore Dock wall and impacts upon this species as a result of the proposed development will need to be assessed. However, it will not be possible to view them for survey from the landward side. One option to enable a survey is to board the Mersey ferry, which runs adjacent to the breeding site, and take video footage of them, alternatively a small boat or drone could be used. ’</i></li><li>■ <b>Bats</b> <i>‘I understand that bat roost potential surveys of the structures on the site, including the boundary wall, have already been undertaken. Due to timescales, I advise that the applicant submits the bat roost potential survey report to the Council as soon as possible, to ensure that the recommendations made by the applicant’s ecological consultant with regard to further survey requirements are acceptable. The survey report should include photographs and detailed descriptions of the buildings and structures which have been assessed.</i> <i>The results of the aquatic surveys (see below) should be used to determine the requirement for bat activity surveys to be undertaken. If large aquatic invertebrate population, for example, flies or emerging larvae, are found to be present, bat activity surveys will be warranted. ’</i></li></ul>	ES Volume II, Chapter 12; and ES Volume III, Appendix 12.1. ES Volume II, Chapter 13; and ES Volume III, Appendix 13.1.

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	<div><div>■ Passage and wintering birds</div><p><i>‘Wintering bird surveys have been undertaken on the site from November 2016 to February 2017 inclusive, using two vantage points (VP1 and VP2). According to the applicant’s ecological consultant, VP1 allowed for monthly bird counts of the site, whereas VP2 covered a wider area encompassing half way across the Mersey and adjacent docks.</i></p><p><i>The winter surveys have not included autumn passage and, from the vantage point locations which have been provided, it does not appear that the entire zone of influence of the proposed development has been included in the wintering bird surveys undertaken to date.</i></p><p><i>The applicant must ensure that further wintering bird surveys are undertaken to include autumn passage (commencing in September) and the entire zone of influence of the proposed development. A minimum of 36 hours vantage point survey will be required (in accordance with the current best practice for vantage point surveys (currently Recommended Bird Survey Methods to Inform Impact Assessment of Onshore Wind Farms, Scottish Natural Heritage, 2014).’</i></p><div><div>■ Aquatic Surveys</div><p><i>‘An integrated aquatic survey sampling methodology is needed to (i) characterize the aquatic communities / habitats present (ii) enable impact assessment to be completed and (iii) advise on any avoidance measures, mitigation and compensation needed. A key point will be to identify potential prey items, such as fish species, for any of the designation features of the Mersey Estuary and Liverpool Bay Natura 2000 sites e.g. cormorant / grebe, which form part of the overwintering water bird assemblage. The ROV survey will be undertaken of dock walls to provide information on the benthic communities present within the dock. The video must be of a good quality to ensure that benthic communities and any invasive species can be adequately identified and be recorded at different water depths. The applicant should also give consideration to undertaking scrapes of the dock wall to provide further information on the species present if the video quality is not sufficient as can occur within docks.</i></p><p><i>MEAS advise that a biosecurity plan will be required in support of the application which describes how the spread of invasive non-native marine species will be prevented during the works. Grab samples of fauna within the dock sediment are also proposed. The grabs should be of a sufficient size and number to ensure that sampling effort is robust.</i></p><p><i>Sediment samples taken at the same time as the grab samples are also to be analysed for chemical contamination. This analysis must be undertaken at an accredited laboratory. The physical and chemical composition of the dock sediments to be removed and/or disturbed by the proposed development will need to be known to inform impact assessment and mitigation, re-use potential and disposal options e.g. environmental permit requirements.</i></p><p><i>The applicant’s ecological consultant considers that sufficient data on water quality and fish will be available from existing sources. However, the sources and age of these data have not been specified and will be required within the Environmental Statement. They should be no older than 3 years.’</i></p><div><div>■ Ecological Impact Assessment (EclA)</div><p><i>‘The proposed EclA should follow the CIEEM (2010 and 2016) guidelines. As part of the EclA, the applicant’s ecological consultant proposes undertaking a cumulative impact assessment which is based upon details of schemes obtained from the Local Authority. However, in addition to the Local Planning Authority, details of schemes should also be obtained from other authorities, including Wirral and Sefton Councils and the Marine Maritime Organisation.’</i></p><div><div>■ Habitats Regulations Assessment (HRA)</div><p><i>‘The applicant’s ecological consultant proposes to undertake a shadow HRA Stage 1 Screening Report in order to determine whether the scheme is likely to impact upon features of the Mersey Estuary SPA.</i></p><p><i>Rather than screening, this should be referred to as an Assessment of Likely Significant Effects (ALSE) and it will be used by the Council to determine whether the scheme is likely to impact upon European sites. In addition to the Mersey Estuary SPA (and Ramsar sites), the ALSE will also need to include, but not be limited to, the following European sites:</i></p><div><div>— The Liverpool Bay proposed SPA extension (which lies immediately adjacent to the application site boundary);</div><div>— Mersey Narrows and North Wirral Foreshore SPA and Ramsar sites;</div><div>— Ribble and Alt Estuaries SPA and Ramsar sites; and</div><div>— The Dee Estuary SPA and Ramsar sites.’</div><div><div>■ Other issues</div><p><i>‘I advise that an integrated approach and liaison between the applicant’s environmental specialists will be required to ensure that any archaeological or intrusive site investigation works do not have harmful ecological impacts.</i></p><p><i>Air quality, noise and lighting assessments are proposed to inform the EIA. These assessments should consider impacts upon statutory designated nature conservation sites.</i></p></div></div></div></div></div></div>	

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	<i>The application site lies adjacent to the Mersey Estuary Nature Improvement Area (NIA), although the site only provides very limited opportunities for the creation of additional habitat. Any planting of trees on the site should form part of an integrated green infrastructure approach which includes other options for enhancing the site’s ecological value, such as the creation of green walls / roof areas. There may be potential to use connections along the canal to improve accessibility (links into Ecological Network, emerging LCR SUD and The Mersey Forest GI Strategy and Nature Connected GI prospectus). Widespread planting of trees is however not appropriate for the site. This could be realized through a Green Infrastructure Plan for the proposal.’</i>	
<b>Merseyside Environmental Advisory Service (MEAS) (23rd June 2017)</b>	<p><b>Waste</b></p> <p>It is proposed that Solid Waste Management should be scoped down in the ES, Merseyside Environmental Advisory Service do not agree with this position as significant volumes of waste is likely to be generated during both the construction and operational phases of the development. MEAS state:</p> <p><i>‘...As raised in paragraph 8 above, I do not agree with the proposed position to scope down waste as significant volumes of waste are likely to be generated during both the construction and operational phases of the development. Generation of waste during both construction and operation may have impacts on air quality, noise, management of ground conditions, water environment and visual amenity. An assessment of waste impacts is proposed is intended to focus on the ability of the existing waste infrastructure capacity to cope with this development. Whilst it is appreciated that many of the waste impacts can be dealt with through other ES chapters, there are some issues which have not been considered and which do merit further consideration as part of the proposed development and its impact assessment. I advise that a Sustainable Resource Management Plan or similar approach, which considers sustainable resource matters, beyond WLP policy, such as minerals and energy, may be appropriate.’</i></p>	<p>A response was issued to MEAS on 01/09/17 stating the following, which MEAS responded and agreed to on 22/09/17:</p> <p>It is agreed that large amounts of waste will arise from the construction and operational phases of the proposed development. However, as described in the scoping report, we would argue that both the construction and operational waste can be appropriately managed to ensure that significant environmental effect do not arise, and it is on this basis that we propose to scope down this topic.</p> <p>Noted MEAS’ comments regarding the potential impacts of waste on air quality, noise, management of ground conditions, water environment and visual amenity. As described in the scoping report, provided that all legislative requirements in relation to handling of waste arisings are met during the construction and operational phases, including the Duty of Care and relevant health and safety legislation, waste would be handled in such a manner that significant impacts on the environment or human health and safety would not be anticipated. Nevertheless, as alluded to in MEAS’ response, the potential effects of the scheme on air quality, noise management of ground conditions, water environment and visual amenity during the construction phase will be assessed and reported within each of the relevant technical ES chapters. This will include a consideration of effects related to the removal, storage and transfer of waste generated at the site. On this basis, we consider that further consideration of the effects of waste on these receptors in the EIA is unnecessary.</p> <p>Noted the comments regarding the preparation of a Sustainable Resource Management Plan. Buro Happold, waste consultants, have been working with the project team since the start of RIBA Work Stage 1 + to inform the proposed development regarding the need to deliver a comprehensive sustainable solid waste management strategy.</p> <p>The following documents are provided within the ES appendices:</p> <ul style="list-style-type: none"><li>■ Operational Waste Management Strategy – ES Volume III, Appendix 3.2</li><li>■ Construction Waste Management Strategy – ES Volume III, Appendix 4.3</li></ul>
<b>Merseyside Environmental Advisory Service (MEAS) (23rd June 2017)</b>	<p><b>Waste</b></p> <p>MEAS advise that given the location of the proposed stadium, and the windiness of the site, match day litter and litter from events is an issue which does need to be assessed. This has not been considered as part of the scoped down assessment. For example, generation of litter on-site and along the main access routes to the proposed stadium could have pollution and amenity impacts on the water environment including the River Mersey, docks and canal systems. Effects on the designated sites and biodiversity of the river, as well as a visual impact for local residents, businesses and visitors will need to be assessed within the ES and appropriate avoidance and mitigation measures proposed. Consideration should also be given to the provision of information to users of the stadium / venue (litter management policy / code) to help avoid litter generation.</p>	<ul style="list-style-type: none"><li>■ ES Volume III, Appendix 3.1</li><li>■ ES Volume II, Chapter 17; and ES Volume III, Appendix 17.1</li></ul>



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<b>Merseyside Environmental Advisory Service (MEAS) (23rd June 2017)</b>	<b>Waste</b> MEAS also advise consideration should be given to food waste generated during the operation of the new stadium (e.g. match days, and through day to day operation of the Club) with a view to managing this as far up the waste hierarchy as possible, perhaps through an on-site, small-scale AD or CHP facility that could also make a positive contribution to meeting the energy needs of the proposed stadium and reduce carbon emissions.	Organic waste would be produced intermittently, in potentially large quantities, from the stadium. The waste would principally comprise grass cuttings and food waste. The design team will, as part of ongoing discussions and consideration of available options, investigate the feasibility of on-site AD/CHP to manage the site’s organic waste. However, we consider that there are two key constraints to the provision of on-site AD/CHP facilities, the first being a limited amount of space and the second being the inconsistency in flow of feedstock. It is understood that the Applicant has already explored the potential to send food waste arising at Goodison Park to a third party (off-site) AD plant. It is anticipated that this would also apply to organic waste arisings from the Bramley Moore Dock site. The sustainability benefits of recovering energy from EFC’s organic waste could therefore be achieved, with the likely constraints to on-site recovery being overcome. The results of any future feasibility assessment regarding the potential for an on-site AD/CHP will be communicated with the team. The Operational Waste Management Strategy is provided in ES Volume III, Appendix 3.2.
<b>Merseyside Environmental Advisory Service (MEAS) (23rd June 2017)</b>	<b>Waste</b> MEAS state ‘it is proposed that BMD will be infilled with marine-won sand, NPPF paragraph 143 bullet point 2 encourages the substitution of secondary and recycled aggregates over primary minerals. Construction, demolition and excavation waste (CDEW) is how many of the Liverpool docks have been infilled in the past but would obviously be subject to an Environmental Permit and the necessary controls to avoid pollution. Therefore, I will advise that infilling with CDEW and not just relying on virgin marine won sand would be appropriate subject to supply and engineering considerations.’	The infilling of the dock with inert waste would be subject to a waste recovery Environmental Permit or the provisions of CL:AIRE. For the secondary aggregates to no longer be classified as ‘waste’, it is necessary for the material to meet the criteria set out within the Waste and Resources Action Programme (WRAP) and EA document ‘Quality Protocol-Aggregates from inert waste: End of waste criteria to produce aggregates from inert waste’. Otherwise the recycled material remains a waste and the Environmental Permitting regime applies (i.e. the need for a recovery Permit). The detailed methodology around the dock infill is provided in ES Volume III, Appendix 4.1 and Appendix 4.2.
<b>Merseyside Environmental Advisory Service (MEAS) (23rd June 2017)</b>	<b>Waste</b> MEAS advise the ‘Relevant Planning Policy section’ should also refer to the Merseyside and Halton Joint Waste Local Plan. Policies WM8 and WM9 apply	ES Volume II, Chapter 6
<b>Merseyside Environmental Advisory Service (MEAS) (23rd June 2017)</b>	<b>Minerals</b> MEAS state in their response ‘As referred to in paragraph 7 above, consideration needs to be given to the displacement of existing businesses, and the impacts the proposal will have on land, and in this case the Port of Liverpool operations in terms of loss of the dock. Specifically, the loss of a minerals wharf for marine-won sand which should be safeguarded under NPPF paragraph 143. Merseyside has very limited minerals resources with only two active quarries and two active wharves for marine-won sand and gravel. Protecting these primary resources for the highest end uses would be preferable, and as referred to in paragraph 29 above, consideration should be given to using secondary or recycled aggregates for the infilling of the dock.’	Impacts to businesses and loss of existing employment is considered within the socio-economic assessment presented in ES Volume II, Chapter 20. The detailed methodology around the dock infill is provided in ES Volume III, Appendix 4.1 and Appendix 4.2.
<b>Merseyside Environmental Advisory Service (MEAS) (23rd June 2017)</b>	<b>Low Carbon/Renewable Energy</b> MEAS advise the EIA Scoping report does not discuss inclusion of low carbon or renewable energy for the proposed stadium. They identify this as a significant omission, given the scale of the proposed development. They state ‘consideration should be given to this in ES and stadium design as a means of reducing the GHG emissions and climate change impacts arising from the proposed development. This could be linked to the sustainable resource management plan referred to in paragraph 33 above. There are many examples around the world of sports stadiums that are reducing their grid energy requirements and energy consumption through a range of measures including energy conservation and efficiency measures and; installation of renewable technologies e.g. sensitively located and designed on-building solar photovoltaics. Whilst all proposed renewable energy technologies would need to be assessed, installation of wind turbines in this location is likely to raise impact pathways with bird receptors and some designs may not be appropriate.’	An Energy Statement (document ref: BMD01-BHE-ZZ-XX-RP-YN-0300) and Sustainability Statement (document ref: BMD01-BHE-ZZ-XX-RP-YS-0300) have been produced and submitted as stand alone documents as part of the planning application for the proposed development (Buro Happold,2020).  The placement of 2050 m² of PV panels has been sensitively located on the stadium roof on the south stand, as detailed on the application drawings submitted alongside the planning application.

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Merseyside Environmental Advisory Service (MEAS) (23rd June 2017)	<p><b>Construction Environment Management Plan</b></p> <p>MEAS advise the applicant should also prepare a Construction Environmental Management Plan (CEMP) document to manage and mitigate the main environmental effects during the construction phases of the proposed development. The CEMP should address and propose measures to minimise the main construction effects of the development and, amongst other things, should include details of ecological mitigation, construction and demolition waste management, pollution prevention and soil resource management. The CEMP would normally be expected to include the agreed method statements to mitigate or avoid adverse environmental impacts.</p> <p>They suggest the CEMP should be compiled in a coherent and integrated document and should be accessible to site managers, all contractors and sub-contractors working on site as a simple point of reference for site environmental management systems and procedures.</p>	<p>The environmental effects relating to the construction phase are covered on a topic by topic basis in the technical ES chapters (ES Volume II, Chapters 7-20) along with appropriate mitigation proposed. Environmental considerations are also included in the Construction Management Plan (ES Volume III. Appendix 4.1).</p> <p>It is anticipated a full CEMP will be secured through a planning condition.</p>
Environment Agency (22nd June 2017)	<p>The EA agree with the proposed scope with regards to matters in their remit. The following comments have been made:</p> <p><b>Biodiversity</b></p> <p><i>‘During the construction phase noise and vibration may be potentially significant impact to fish populations by directly killing or having an influence on migratory fish species located within the Mersey for example Atlantic salmon. Therefore, the EA recommend that this should be considered as a key issue and requirement for assessment. ’</i></p>	ES Volume II, Chapter 13; and ES Volume III, Appendix 13.1.
Environment Agency (22nd June 2017)	<p><b>Water Environment</b></p> <p><i>‘The Scoping Report identifies that a Flood Risk Assessment will be a carried out, which will include climate change, sea level rise and wave overtopping. For issues relating to surface water and groundwater flooding the Lead Local Flood Authority should be contacted. The EA understand the applicant has already obtained a flood risk product from the EA with regards to flood risk. To support the proposal a comprehensive Water Framework Directive assessment must be undertaken. The applicant must refer to the EA guidance “Clearing the Waters for All”, which can be found at: <a href="https://www.gov.uk/guidance/water-framework-directive-assessment-estuarine-and-coastal-waters">https://www.gov.uk/guidance/water-framework-directive-assessment-estuarine-and-coastal-waters</a>’</i></p>	ES Volume II, Chapter 11; and ES Volume III, Appendix 11.7.
Environment Agency (22nd June 2017)	<p><b>Ground Conditions</b></p> <p>The EA consider the historic industrial land uses at and around the site are likely to have led to elevated concentrations of contamination which could pose an unacceptable risk to the adjacent River Mersey and the underlying Principal Aquifer.</p> <p>The EA agree with the recommendations to include a section/chapter on Ground Conditions in the ES.</p> <p>They state <i>‘ Any proposal to develop this site will need to be accompanied by an assessment of the impacts of development upon the hydrogeology of the area. The EA have stated that this will need to address both existing contamination which may be present and the impacts that the future ongoing operation of the site will have on the groundwater environment.</i></p> <p><i>The applicant/developer should refer to the EA’s groundwater protection guidance and groundwater protection position statements. The guidance sets out the EA’s position for a wide range of activities and developments including waste management, land contamination, discharge of liquid effluents and drainage.</i></p> <p><i>The EA also offer the following advice to the applicant:</i></p> <p><i>Model Procedures and good practice</i></p> <p><i>Due to the former land use(s), soil and/or groundwater contamination may exist at the site and the associated risk to controlled waters should be addressed by:</i></p> <ul style="list-style-type: none"><li>■ <i>Following the risk management framework provide in CLR11, Model procedures for the management of land contamination</i></li><li>■ <i>Referring to the EA guiding principles for land contamination and the land contamination sections in the EA ‘s Groundwater Protection: Principles and Practice</i></li><li>■ <i><a href="https://www.gov.uk/government/publications/managing-and-reducing-land-contamination">https://www.gov.uk/government/publications/managing-and-reducing-land-contamination</a></i></li><li>■ <i><a href="https://www.gov.uk/government/publications/groundwater-protection-principles-and-practice-gp3">https://www.gov.uk/government/publications/groundwater-protection-principles-and-practice-gp3</a></i></li></ul> <p><i>All investigations of land potentially affected by contamination should be carried out by or under the direction of a 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. ’</i></p>	ES Volume II, Chapter 10; and ES Volume III, Appendix 10.1 and Appendix 10.2

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CONSULTEE	COMMENTS	WHERE ADDRESSED
Environment Agency (22nd June 2017)	<p><b>Solid Waste Management</b></p> <p>The EA note and accept that Solid Waste Management is to be scoped down. The EA offer the following advice:</p> <p><i>‘The development may require an Environmental Permit under the Environmental Permitting (England and Wales) Regulations 2010 from the EA, unless a waste exemption applies. If any controlled waste is to be removed off site, then the site operator must ensure a registered waste carrier is used to convey the waste material off site to a suitably permitted facility. The Environmental Protection (Duty of Care) Regulations 1991 for dealing with waste materials are applicable for any off-site movements of wastes. The developer as waste producer therefore has a duty of care to ensure all materials removed go to an appropriate permitted facility and all relevant documentation is completed and kept in line with regulations. If any waste is to be used on site, the applicant will be required to obtain the appropriate waste exemption or permit from us, or if relevant, consider using the CL:AIRE Code of Practice. The EA are unable to specify what exactly would be required if anything, due to the limited amount of information provided. The developer must apply the waste hierarchy in a priority order of prevention, re-use, recycling before considering other recovery or disposal options. In England, it is a legal requirement to have a site waste management plan (SWMP) for all new construction projects worth more than £300,000. The level of detail that the SWMP should contain depends on the estimated build cost, excluding VAT. The applicant must still comply with the duty of care for waste, as a record of all the waste movements will need to be in one document, having a SWMP will help to ensure compliance with the duty of care.’</i></p>	<p>Both an Operational Waste Management Strategy (OWMS) and a Construction Waste Management Strategy (CWMS) have been provided within the ES appendices, which will address the issues raised including: Duty of Care requirements; the developer’s statutory requirement to apply the waste hierarchy; classification of waste; and; waste handling/transport/treatment/disposal during both the construction and operational phases of the scheme.</p> <p>It has been noted that following a repeal of the Site Waste Management Plans Regulations 2008 in 2013, the legal requirement for Site Waste Management Plans (SWMP) for projects exceeding £300k build cost was removed. Notwithstanding this, the CWMS will address many of the former SWMP requirements, including the proposed methods for managing construction waste and any associated statutory requirements. ES Volume III. Appendix 3.1 and Appendix 4.1.</p>
Historic England (15th June 2017)	<p>Historic England’s (HE) initial assessment shows a number of designated heritage assets within the proximity of the proposed development. They draw particular attention to the following:</p> <ul style="list-style-type: none"><li>— Liverpool Maritime Mercantile City World Heritage Site;</li><li>— Stanley Dock Conservation Area;</li><li>— Stanley Warehouse (GII*);</li><li>— Bramley Moore Dock Retaining Walls (GII); and</li><li>— Dock wall from opposite Sandhills Lane to Collingwood dock with entrances (GII).</li></ul> <p>HE advise the following:</p> <ul style="list-style-type: none"><li>■ <i>‘The ES should also 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.</i></li><li>■ <i>HE recommends that the Conservation Officer of Liverpool City Council and the archaeological staff at Merseyside Environmental Advisory Service are involved in the development of the 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.</i></li><li>■ <i>Given the heights 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, including across the river. The assessment should 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></li></ul>	<ul style="list-style-type: none"><li>■ ES Volume II, Chapter 17; and ES Volume III, Appendix 17.1.</li><li>■ ES Volume II, Chapter 18; and ES Volume III, Appendix 18.1 and Appendix 18.2.</li></ul>
Historic England (15th June 2017)	<p>HE advise 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.</p>	<ul style="list-style-type: none"><li>■ ES Volume II, Chapter 18; and ES Volume III, Appendix 18.1 and Appendix 18.2.</li><li>■ ES Volume II, Chapter 19; and ES Volume III, Appendix 19.1</li></ul>
Historic England (15th June 2017)	<p>Historic England made the following comments regarding the specific content of the Scoping Report:</p> <ul style="list-style-type: none"><li>■ <i>‘The site is situated within the Liverpool Maritime Mercantile World Heritage Site and whilst the scoping report makes reference to the need to consider the potential impacts of the proposed development on the Outstanding Universal Value of the designation, Historic England advise that this analysis should be carried out in a Heritage Impact Assessment (HIA), with the main findings incorporated into the body of the ES.</i></li><li>■ <i>The HIA will need to 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 a technical appendix of the ES.</i></li></ul>	<ul style="list-style-type: none"><li>■ ES Volume II, Chapter 17; and ES Volume III, Appendix 17.1.</li><li>■ ES Volume II, Chapter 18; and ES Volume III, Appendix 18.1 and Appendix 18.2.</li></ul> <p>The long range and short range viewpoints selected as part of the assessment were agreed in advance with Liverpool City Council (as statutory local planning authority) and Historic England.</p>



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CONSULTEE	COMMENTS	WHERE ADDRESSED
	<ul style="list-style-type: none"> <li>In the consideration of the potential impacts on the identified heritage assets it is vital that the contribution the assets setting makes to their significance is established and appropriately weighed into the considerations, in line with paragraph 127 of the NPPF. Section 6.11 of the scoping report does not explicitly state that this will be undertaken as part of the ES chapter on Heritage; this requires addressing and reference should be made to our document Good Practice Advice Note: The Setting of Heritage Assets (GPA3) - <a href="https://content.historicengland.org.uk/imagesbooks/publications/gpa3-setting-of-heritage-assets/gpa3.pdf/">https://content.historicengland.org.uk/imagesbooks/publications/gpa3-setting-of-heritage-assets/gpa3.pdf/</a>.</li> <li>The production of verified views would be a fundamental part of the evidence base for ES. A number of representative views are included within appendix D of the scoping report, however, it is unclear how these views have been identified, or their exact location. Historic England would welcome further discussions regarding the location of the views points to be used to provide the necessary visualisations, and reference should again be made to our document GPA3, as well as the Liverpool Maritime Mercantile World Heritage Site SPD.</li> <li>Section 3.9 of the scoping report discusses the consideration of alternatives for the provision of a new football stadium. It sets out the process which has been undertaken to assess potential development sites and concludes that Bramley Moore was identified as the most appropriate location for the development. The chapter further states that the background information will be provided as an overview within the technical appendices but will not feature within the individual technical assessments. In order for the document to be credible, the consideration of alternative sites should form an integral part of the ES.</li> <li>Reference is made within the scoping report of partial demolition of listed buildings, and as a result paragraph 133 of the NPPF could be a relevant consideration. 133 states that a local planning authority should refuse consent, unless it can be demonstrated that the substantial harm or loss to a designated asset is <b>necessary</b> to achieve the identified substantial public benefits. Paragraph 132 of the NPPF also states that as heritage assets are irreplaceable, any harm or loss should require clear and convincing justification. Historic England advise that the consideration of alternatives is a fundamental part of the justification required to begin to address paragraph 133 and 132 of the NPPF and should be scoped into the ES.</li> </ul>	
Graeme Ives Heritage Planning (27th June 2017) On behalf of Liverpool City Council	<p><b>Consideration of Alternatives (paragraph 3.9)</b></p> <p>Graeme Ives had the following comments:</p> <p><i>'Section 2.1 refers to BMD itself being approximately 4 ha in area. The consideration of alternatives refers to a 8ha site requirement and it may therefore be helpful to confirm that the site meetings this requirement. If, during the course of the application, the proposals are assessed to cause 'substantial harm' the applicant will need to decide whether to provide a clear and convincing justification on the basis of the first part of NPPF 133, which requires the harm to be necessary to achieve substantial public benefits, or the second part of NPPF 133 that sets out four tests that must all be complied with.'</i></p>	<ul style="list-style-type: none"> <li>ES Volume II, Chapter 5. Information also provided in the Planning Statement (CBRE, 2019) and Planning Statement Addendum (CBRE, 2020).</li> <li>ES Volume III, Appendix 5.1 — Alternative Site Assessment</li> </ul>
Graeme Ives Heritage Planning (27th June 2017) On behalf of Liverpool City Council	<p><b>Scoped-in Topics – Archaeology</b></p> <p><i>'MEAS are to advise on the appropriateness of a desk-based assessment in relation to the significance and sensitivities of the relevant archaeological assets. It may be helpful for the archaeological assessment to be informed by the proposed ground conditions survey, which may have potential to provide further information on the historic structure of the BMD dock retaining wall.</i></p> <p><i>It will be important that the methodology for either the Archaeological or Built Heritage topics to cover the myriad of non-designated features, including historic surfaces, sluice systems, energy systems, lock gates, capstans and features such as the WWII defensive structures. The grade II listed dock boundary wall also retains a number of 'archaeological' features, such as the retained stanchions of the dockers railway and the evidence of related structures such as the steps to the higher-level stations.'</i></p>	ES Volume II, Chapter 19; and ES Volume III, Appendix 19.1
Graeme Ives Heritage Planning (27th June 2017) On behalf of Liverpool City Council	<p><b>Scoped-in Topics – Heritage</b></p> <ul style="list-style-type: none"> <li><i>'The Context section refers only to adverse effects and it may be helpful to refer to the broad range of potential positive, neutral and adverse impacts.</i></li> <li><i>The Baseline Conditions refer to both designated and non-designated heritage assets. Several specific listed buildings are referred to, due to their proximity to the site, and the locations of designated heritage assets are identified in Appendix A Figure 3 'Key Environmental Constraint'.</i></li> <li><i>However, it would be helpful if the ES Scoping Report provided a table that identified the designated and non-designated heritage assets (receptors) that will be scoped into the EIA. The methodology for identifying the relevant heritage assets could be informed, for example, by the NPPF definition of setting and the related Historic England guidance.</i></li> <li><i>The extent of the WHS assessment, referred to in the Key Issues section, should also be set out and should consider the component parts of OUV. For example, including the 'attributes' of OUV, authenticity and integrity, the six character areas, the inscription criteria and consider the issue of intangible as well as tangible heritage assets. These factors are summarised together in the Statement of OUV. The methodology for undertaking the WHS assessment should comply with the ICOMOS Guidance on Heritage Impact Assessments.</i></li> <li><i>It would be helpful if the ES Scoping Report also set out the methodology for identifying non-designated heritage assets relevant to the proposed development. Historic England guidance in Best Practice Advice:2 Decision-taking in the Historic Environment explains that non-designated assets may be those included on a local list, identified in a HER search or could be those identified by the LPA while determining the application. The NPPF (Paragraph 128) effectively establishes a HER search as a minimum standard, it would therefore be helpful if a proposed schedule of non-designated assets could be agreed following a HER search. The assets identified through the HER search should comprise existing standing structures rather than the former sites of structures that have subsequently been removed.</i></li> </ul>	<ul style="list-style-type: none"> <li>ES Volume II, Chapter 17; and ES Volume III, Appendix 17.1.</li> <li>ES Volume II, Chapter 18; and ES Volume III, Appendix 18.1, 18.2, 18.6 and 18.7.</li> </ul>

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CONSULTEE	COMMENTS	WHERE ADDRESSED
	<ul style="list-style-type: none"><li>■ <i>With reference to the above baseline conditions the ES Scoping Report should recommend a study area with respect to built heritage considerations and it would be helpful if a plan could be provided to agree the extent of that study area. A methodology for identifying the study area, including consideration of issues such as topography, grain and structure of the street pattern, location of key landmarks and the scale and extent of intervening structures, would also be helpful to justify the extent of the study area and ensure that it is bespoke to the characteristics of the site and adjoining area.</i></li><li>■ <i>It would be helpful if the assessment methodology included a summary of the view analysis assessment, providing a schedule of recommended viewpoints and summarising the approach to photography. The TVIA chapter provides a detailed list of viewpoint locations and explains the approach to shortlisting from an initial long list. The Built Heritage chapter could move forward on a similar basis and identify the baseline heritage conditions in each selected view. The City Council would be pleased to advise on a draft schedule of viewpoint locations.</i></li><li>■ <i>The assessment methodology should also describe the approach to assessing the contribution of setting to significance (for example, using the 5 stage process recommended by Historic England in Best Practice Advice: 3 The Setting of Heritage assets, 2015, or similar approach); the methodology for assessing the character and appearance of the relevant conservation areas and the approach to assessing the special architectural or historic interest of the listed buildings, for example the DCMS Principles for Selection and the Historic England Thematic Listing Guides, may also be helpful.’</i></li></ul>	

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2.6 PUBLIC CONSULTATION

2.6.1 Consultation Process

Initial engagement activities relating to the proposed development commenced in March 2017 and continued to the end of the second-stage formal pre-application consultation period in August 2019. This has comprised of a two-stage formal stakeholder and public consultation campaign and included other measures designed to engage with specific audiences during the period between the two consultation periods.

The first stage consultation ran during November and December 2018 and was focused on the principles of the development. The second stage consultation ran during July and August 2019. This consultation provided further detail, including the emerging design of the proposed stadium and proposed transport strategy, as well as information regarding potential impacts associated with the development. Further information is provided in the Statement of Community Engagement (prepared by Influential) submitted alongside the Planning Application, and briefly summarised below. The development design was finalised in mid-December 2019 in advance of the planning submission.

Since submission of the application, details of the revised scheme have been released in a blog post from the Club, dated 26th August 2020, which has since been reported in local and regional media. This blog provides an update on the planning application and the design changes which have been made since submission of the planning application in December 2019.

The blog includes images of the revised design to inform fans and interested parties of the amendments which have been made to the scheme.

2.6.2 Consultation Area

A wide-reaching consultation area was established to reflect the Applicant's ambition for reaching not just football supporters but non-football supporting audiences and those that live within the wider City Region.

In order to reach as many people as possible, a touring roadshow exhibition was undertaken which ran for eighteen days in total. The roadshow was held in locations in Liverpool but also in locations in the Sefton and Wirral local authority areas because of their proximity to Bramley-Moore Dock and because of the clubs understanding that the proposals would have impacts which would transcend the Liverpool local authority boundary.

In addition, consultation leaflets were distributed to commercial and residential addresses within a one-mile radius of both Goodison Park and Bramley-Moore Dock.

Over 20,000 people responded during this first stage consultation, with 43,000 people participating in the second stage.

2.6.3 Project Contact and Communication Channels

A dedicated project website (<https://www.peoples-project.co.uk/>) was established as a portal for engagement, information and consultation. The website was kept up to date at all times with news and a wide range of detailed information about the proposals.

The project website was a key repository of information and included copies of all of the exhibition materials along with a link to access the questionnaire.

Targeted social media adverts were also utilised for some parts of the roadshow to encourage further engagement, which would display specific details of the roadshow to people within defined areas. This was achieved by using the GPS location functions used in all popular social media platforms.

The Club also sent an email to its database of contacts encouraging them to take part in the consultation, in addition to producing and distributing 51,416 consultation leaflets to commercial and residential addresses within the one-mile radius of both Goodison Park and Bramley-Moore Dock. These leaflets included a tear-off copy of the questionnaire and a freepost reply.

A telephone helpline was also set up which people could call to dictate their responses to the questionnaire or to request a hard copy be posted to them.

2.6.4 Public Exhibitions

The formal community and stakeholder engagement campaign was launched on Wednesday October 24, 2018 with a series of briefings to media announcing the stage one public consultation roadshow which would start three weeks later on November 15, 2018. A detailed explanation of the publicity for this stage of the campaign is provided in the Statement of Community Engagement.

Dates, locations and attendance figures for each of the 2018 roadshow events are provide in Table 2.2.

Table 2.2

Stage One Public Exhibitions

DATE	LOCATION	ATTENDANCE
15 <sup>th</sup> – 16 <sup>th</sup> November	Blue Base – Salop Street, L4 4BZ (in Blue Base car park)	106 (15 <sup>th</sup> ) / 58 (16 <sup>th</sup> )
17 <sup>th</sup> November	Edge Lane – Liverpool Shopping Park, Edge Lane, L13 1EW	260
18 November	Speke – New Mersey Retail Park Speke Road, L24 8QB	218
19 <sup>th</sup> – 20 <sup>th</sup> November	Liverpool ONE – Paradise Street (outside JD Sports)	384 (19 <sup>th</sup> ) / 374 (20 <sup>th</sup> )
21 <sup>st</sup> – 23 <sup>rd</sup> November	Liverpool ONE – Thomas Steers Way (outside Hilton Hotel)	122 (21 <sup>st</sup> ) / 214 (22 <sup>nd</sup> ) / 274 (23 <sup>rd</sup> )

DATE	LOCATION	ATTENDANCE
24 <sup>th</sup> November	Goodison Park – Goodison Road, L4 4EL	118
25 November	Birkenhead – 222 Grange Road West, CH41 6EB (outside ASDA)	350
26 <sup>th</sup> – 27 <sup>th</sup> November	Liverpool ONE – Paradise Street (outside JD Sports)	247 (26 <sup>th</sup> ) / 179 (27 <sup>th</sup> )
28 <sup>th</sup> – 30 <sup>th</sup> November	Liverpool ONE – Thomas Steers Way (outside Hilton Hotel)	236 (28 <sup>th</sup> ) / 146 (29 <sup>th</sup> ) / 218 (30 <sup>th</sup> )
1 <sup>st</sup> December	New Brighton – Fort Perch Rock, CH45 2JU (in the car park)	234
3 <sup>rd</sup> December	Sefton – Liverpool Road, Crosby (Sainsbury's car park)	211
Total		3,949

The stage two community and stakeholder engagement campaign were launched on 24<sup>th</sup> July 2019 with a series of briefings to media announcing the stage two public consultation roadshow which would start on 26<sup>th</sup> July 2019 along with a launch event, held on 25<sup>th</sup> July 2019, which would reveal the proposed designs of the stadium development, as well as outline designs for the redevelopment of Goodison Park. A detailed explanation of the publicity for this stage of the campaign is provided in the Statement of Community Engagement.

Dates, locations and attendance figures for each of the 2018 roadshow events are provide in Table 2.23.

Table 2.3

Stage Two Public Exhibitions

DATE	LOCATION	ATTENDANCE
26 <sup>th</sup> July	Liverpool ONE (outside John Lewis)	1,207
27 <sup>th</sup> July	Birkenhead 222 Grange Road West, CH41 6EB (outside Asda)	728
28 <sup>th</sup> July	Edge Lane Liverpool Shopping Park, Edge Lane, L13 1EW	550
31 <sup>st</sup> July – 2 <sup>nd</sup> August	Liverpool ONE – Outside John Lewis	1,079 (31 <sup>st</sup> ) / 1,254 (1 <sup>st</sup> ) / 1,266 (2 <sup>nd</sup> )
3 <sup>rd</sup> August	WIDNES Green Oaks Shopping Centre, Green Oaks Way, WA8 6UB	872
4 <sup>th</sup> August	Speke, New Mersey Retail Park, Speke Road, L24 8QB	472
7 <sup>th</sup> – 9 <sup>th</sup> August	Church Street Next to Carphone Warehouse	828 (7 <sup>th</sup> ) / 944 (8 <sup>th</sup> ) / 776 (9 <sup>th</sup> )
10 <sup>th</sup> August	Huyton The Forum, Derby Road, L36 5RT (Near the Post Office)	422

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DATE	LOCATION	ATTENDANCE
11 <sup>th</sup> August	CROSBY Crosby Lakeside Activity Centre, Cambridge Road, Waterloo, L22 1RR	581
13 <sup>th</sup> August	Castle Street next to Viva Brazil	505
14 <sup>th</sup> – 15 <sup>th</sup> August	Church Street Next to Carphone Warehouse	665 (14 <sup>th</sup> ) / 818 (15 <sup>th</sup> )
16 <sup>th</sup> August	St Helens Church Square Shopping Centre, St Helens, WA10 1AF	641
17 <sup>th</sup> August	Goodison Park, Goodison Road L4 4EL	594
17 <sup>th</sup> August	The People’s Hub, 46 Spellow Lane, L4 4DF	60
18 <sup>th</sup> August	New Brighton, Ian Fraser Walk, CH45 2PB	738
Total		15,000

The response during both stages of the consultation was overwhelmingly positive for the proposals. Further detailed analysis is provided in the Statement of Community Engagement.

### 2.7 INITIAL PLANNING APPLICATION (DECEMBER 2019) AND MARINE LICENCE APPLICATION (MARCH 2020) SUBMISSION & CONSULTEE RESPONSES

In December 2019, the Club submitted a full planning application to LCC (LPA application reference number 20F/0001) for a previous version of the proposed scheme. An application for a marine licence was also submitted to the Marine Management Organisation (MMO) in March 2020 (MMO reference: MLA/2020/00109). The applications were supported by a previous version of this ES (CBRE, December 2019).

Following the consultation process, the Club has sought to make design changes to the submitted scheme in response to the consultee comments and technical advice from the design team. To take account of the design changes, an updated planning application and marine licence application have been submitted. This revised ES (CBRE, September 2020) has also been prepared in response to the design changes and consultee comments and has been submitted in support of both applications.

The design changes are discussed in detail in Chapter 3 (Application Site & Proposed Development) of this volume of the ES, and in the updated Design and Access Statement submitted alongside the planning application (Pattern Design, 2020). The specific purpose of the key design changes is reported in Chapter 5 (Alternatives & Design Evolution).

The consultee comments relevant to the ES provided in response to both the planning application and the marine licence application are set out in Tables 2.4 and 2.5 respectively. The tables also set out where in the revised ES these comments are addressed. The consultee comments specific to each technical topic scoped in to the ES, and the responses to these, are also set in each of the relevant technical topic chapters in this volume of the ES.



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Table 2.4  
Summary of Relevant Planning Application Consultation Responses

CONSULTEE	COMMENTS	WHERE ADDRESSED
LCC – Air Quality	<p>LCC Air Quality raised concerns over the pollution sources assessed:</p> <ul style="list-style-type: none"><li>‘Supporter coaches parking - It is proposed that coaches will be parked in side street during the matches. There is currently an issue near to the existing football stadiums that drivers leave their coach engines idling during the match. This negatively impacts air quality and is the cause of neighbour complaints. This should be considered and the applicant should consider measures to prevent coach drivers leaving their engines idling (e.g. welfare facilities for drivers, educational messaging to drivers and companies involved)</li><li>Outside broadcasting compound – Please can the applicant clarify whether outside broadcasting facilities are powered by generators or the mains electrical supplies? If generators are used, what is the potential impact on air quality?</li><li>Fixed plant in the stadium – There is little consideration of emissions from fixed plant, such as the emergency generators and the boiler mentioned in the ventilation and refrigeration statement. Are these likely to be potential sources of pollution? The ventilation and refrigeration statement also mentions mechanical extraction from the multi storey car park. Have these been considered as point sources in the AQA?’</li></ul> <p>They also requested further detail on:</p> <ul style="list-style-type: none"><li>‘How many car park spaces will include provisions for Electric Vehicle charging? How will these be split between private and public spaces?’</li><li>Has any consideration been made regarding how the shuttle buses will be fuelled and have low emission options been considered?’</li></ul>	<ul style="list-style-type: none"><li>Supporter Coaches Parking – As detailed in the Transport Assessment, Appendix 7.1, ES Volume III, publicly available facilities are available nearby to help encourage drivers to switch off engines to avoided idling where possible.</li><li>Outside Broadcasting Compound – As confirmed in the Energy Statement, submitted alongside the application (Document reference: BMD01-BHE-ZZ-XX-RP-YN-0300) the Outdoor Broadcasting Compound (OBC) will be powered through battery storage technology and not diesel generators. As such there are no emissions associated with the OBC.</li><li>Fixed Plant within the stadium – The Air Quality Assessment (Appendix 8.1, ES Volume III) covers the air quality impacts associated with the proposed boiler system to be installed within the stadium. Details of the boilers and locations have been provided by the project design engineers (Buro Happold) and are in line with the latest scheme and detailed in the Energy Statement (Document reference: BMD01-BHE-ZZ-XX-RP-YN-0300). The Ventilation and Refrigeration Statement for the proposed scheme is provided in ES Volume III, Appendix 8.2)</li><li>Electric Vehicle Parking – This is addressed within the updated Transport Assessment, Appendix 7.1, ES Volume III.</li><li>Shuttle Buses – Shuttle Buses are to be run on a commercial basis by Stagecoach or Arriva and vehicle specifications are not within the Club’s control. A Pre-booked shuttle services for disabled supporters is proposed to run between the stadium, a park &amp; ride facility at Stanley Park (existing surface car park owned by LCC) and Sandhills train station.</li><li>The Air Quality Assessment (Appendix 8.1, ES Volume III) includes the assessment of the proposed boiler system.</li></ul> <p>Additional information regarding the supporter coaches parking, electric vehicle parking and the shuttle buses is provided within the Transport Assessment (Appendix 7.1, ES Volume III).</p>
Highways England	Highways England have no objection to the proposed development	No specific updates to the ES required
LCC – Lead Local Flood Authority (LLFA)	<p>The LLFA raised a number of queries relating to the Water Resources ES Chapter, Flood Risk Assessment and Drainage Strategy:</p> <ul style="list-style-type: none"><li>They queried the impact on United Utilities WwTW during Operational Phase.</li><li>Further clarification needed on how to avoid ponding on some areas of the application site.</li><li>Further information required regarding sump pumps.</li><li>Query regarding pollution mitigation index.</li><li>Advised that the above ground storage at the south east corner of the application site is considered excessive and the drainage design should be amended.</li><li>Query regarding frequency and maintenance of drainage system.</li><li>Requested micro drainage calculations.</li><li>Requested a reference is added to the FRA confirming the flood warning level for match cancellations.</li></ul>	<ul style="list-style-type: none"><li>Further information is provided in the Water Resources ES Chapter (Chapter 11, ES Volume II) on the potential impacts on United Utilities WwTW during the operational phase.</li><li>Information and clarifications have been added to Appendix 11.3 (Flood Risk Assessment), Volume III, relating to ponding, sump pumps and cancellation of matches.</li><li>Information and clarifications have been added to Appendix 11.4 (Drainage Strategy), Volume III, relating to drainage calculations, pollution mitigation index and drainage systems.</li></ul> <p>Regarding cancellation of matches, this is stated in the FRA: <i>‘The plan will be based on trigger points and thresholds aligned with recorded live flood levels, EA flood warnings and rainfall predictions. This will be developed in consultation with the EA and the LCC emergency team.</i></p> <p><i>The plan will outline the responsibilities and actions of the management authority of the stadium for cancelling matches and events in line with the trigger points set, as well as to manage closure of the lower areas of the site including the at-grade car park, parts of the western terrace and the Fan Zone’</i></p>

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CONSULTEE	COMMENTS	WHERE ADDRESSED
LCC – Heritage Advisor	<p>LCC heritage had the following comments:</p> <p><b>Non-Designated Heritage Assets:</b> <i>‘Doesn’t appear to be a systematic approach to listing all of the non-designated heritage assets that are relevant to the proposal, describing their significance (proportionately), the contribution of setting and the application site to that significance and then assessing what the impact may be. The Heritage Asset Survey (which is excellent) refers to ‘heritage assets’, but I can’t see how they are then handled, as suggested above, in the Heritage Statement. We need to consider, with the Club, how they should be categorised for NPPF purposes. Is each separate bollard a separate heritage asset for the purposes of decision-making? I think this would distort the process due to the sheer numbers, for example, if the Club remove, say, 50 bollards, that would be the total loss of 50 non-designated heritage assets. Perhaps a more reasonable and proportionate approach would be to summarise the Heritage Asset Survey as dock-side features and to identify that as ‘one’ heritage asset. I’m sure that the HER would have been consulted, but I can’t see reference to it. NPPF Paragraph 189 states a HER search is a minimum in describing significance.’</i></p> <p><b>Contribution of the application site to setting:</b> <i>‘The Heritage Statement provides a good summary of the docks as a whole and BMD. It refers to the inter-connected docks etc as part of the significance of BMD. But it does not then seem to consider the contribution of the application site to the other adjoining listed buildings/structures e.g. Salisbury Dock, Victoria Clock Tower etc. The ‘statutory duty’ in S.66 of the 1990 Act relates to the setting of listed buildings. The LPA needs enough information to consider the potential impact on each of the listed buildings / structures relevant to the proposed development and a systematic approach is required to set out how the application site contributes to the significance, including setting, of each of the listed buildings i.e. does the application site make a positive, negative or neutral contribution to the significance of the adjoining listed buildings?’</i></p> <p><b>Impact on the Conservation Area v’s Impact on the Setting of Listed Buildings:</b> <i>‘There may be an inconsistency in considering the impact on the two heritage asset types: Substantial harm is identified to the conservation area, but no impact / harm to the listed buildings near BMD. The Heritage Statement makes full reference to the interconnected dock system. But the impact assessment is almost entirely visual. If there is substantial harm to the conservation area how can there be no harm at all to e.g. Nelson, Salisbury and Collingwood Docks or the clock tower, they were all part of that integrated system? This may be a function of the above query about setting.’</i></p> <p><b>Heritage Asset Survey:</b> <i>‘Tile 2 (north west corner of BMD) refers to structures such as MB7 and TR3 (bollards) as having to be removed due to an increase in levels. They are located close to the coping stones of the listed dock retaining wall. The application refers to the legibility of the dock retaining wall after the stadium is complete. Are there any parts of the coping/edge of the dock retaining wall that will be covered over? If so, has a plan been produced to illustrate this as part of the application? Tile 6 shows feature TR5 (bollard and railway line) to be removed to facilitate concrete parking bays. Can they be retained as part of the hard landscape?’</i></p> <p><b>Cumulative Impacts:</b> <i>‘How do we handle the Liverpool Waters scheme in relation to BMD itself? Outside the application site Liverpool Waters will clearly be a cumulative scheme, particularly in respect to TVIA. However, within the application site the stadium would be developed ‘instead of’ Liverpool Waters rather than being ‘additional to it’. The Heritage Statement refers to cumulative schemes being ‘additional to’, but this can’t be the case for BMD. Although it would seem valid for comparisons to be made between the two schemes.’</i></p>	<p>In response to these comments and various post submission design changes, a full new heritage ES chapter has been prepared (ES Volume II, Chapter 18) along with the associated Heritage Statement (ES Volume III, Appendix 18.1) and Heritage Impact Assessment Report (ES Volume III, Appendix 18.2). The Heritage Asset Survey (ES Volume III, Appendix 18.6) has also been updated for the revised submission. The originally submitted Artefacts Appraisal that was submitted in ES Volume III of the 2019 submission has been superseded by the updated Heritage Asset Survey and does not form part of the amended submission.</p> <p>In addition to updating the heritage related documents, a revised TVIA have been completed (ES Volume II, Chapter 17; and ES Volume III Chapter 17.1), as well as an updated Archaeology assessment (ES Volume II, Chapter 19; and ES Volume III, Appendix 19.1)</p>

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CONSULTEE	COMMENTS	WHERE ADDRESSED
	<p><b>ICOMOS HIA:</b> ‘The ICOMOS HIA report is largely a repeat of the Heritage Statement. The WHS ‘attributes’ and ‘inscription criteria’ are referred to in the ICOMOS style report, but the impact assessment section seems to focus on the individual heritage assets without providing an assessment against the attributes and criteria. While the report comes to a conclusion of the overall impact on the WHS, it doesn’t seem to consider the ‘sum of the parts’ in a methodical way. Whilst, in principle I am not a supporter of the ICOMOS process and think that international/national and local heritage assets should be treated in a holistic manner, for consistency the LPA has been requesting ICOMOS reports with all major developments and has requested that such reports include the ICOMOS ‘assessment tables’, often as appendices. For consistency it will be important to ensure that the ICOMOS report follows the approach of previous submissions. The ICOMOS report refers to the WHS SPD, but I can’t see where it includes an impact assessment against the relevant sections of the SPD.’</p>	
United Utilities (UU)	<p>United Utilities raised queries relating to access to their assets during events — primarily the Waste water Treatment Works (WwTW).</p> <p>They also confirmed they have no principle objection to the proposed approach to drainage and suggest a condition relation to drainage. They also recommended a condition regarding management and maintenance of SuDS.</p> <p>UU also provided comments regarding water supply and UU Property, Assets and Infrastructure.</p>	<ul style="list-style-type: none"><li>■ Ongoing consultation has continued with United Utilities post submission. No further amendments to the application documents were required.</li><li>■ The Water Resources chapter (ES Volume II, Chapter 11) and drainage strategy (ES Volume III, Appendix 11.4) have been updated following the 2019 submission.</li></ul>
Merseytravel	<p>Merseytravel is broadly supportive of the rationale within the Transport Assessment (TA). They requested that LCC condition the provision of all various transport provisions detailed in the TA. They also advised the following:</p> <ul style="list-style-type: none"><li>■ ‘Traffic management measures and highways enhancements in Sefton and Liverpool should be conditioned. This includes Controlled Parking Zones around the stadium. This is to ensure that the development does not affect the operation of the public transport network.</li><li>■ The proposed Shuttle Bus service between the city centre and Bootle town centre and the proposed stadium should be required via planning condition. These should be provided by the Club if not done commercially. Details of the scale and times of operation should be agreed.</li><li>■ Funding for the corraling area at Sandhills should be secured. When not in use this should be suitable for a bus-rail interchange area.</li><li>■ A suitable financial contribution towards the construction of the bus-rail interchange should be made.</li><li>■ Suitable contribution towards a 'Northern Docks Regeneration Area' bus service for a period of no less than 5 years from opening of the stadium to link Sandhills and the city centre.</li><li>■ Securing the provision of a city centre terminal facility which doesn't disrupt other city centre users.</li><li>■ The provision of adequate taxi, parking and management facilities as set out within the application.</li><li>■ The provision of adequate coach parking and management arrangements.</li><li>■ The provision of walking and cycling facilities and measures to promote and accommodate these modes should be provided.</li><li>■ The provision of priority disabled car parking and appropriate vehicle access for drop off/pick up points. Suitable provision for Merseylink Dial-a-ride vehicles.</li><li>■ Welcome the inclusion of Travel Plans and advise the development and implementation of these should be conditioned. These plans should be regularly audited by LCC at the cost of the applicant.</li></ul>	<p>The TA has been agreed with LCC Highways in advance of the planning application resubmission. Dialogue on financial contributions will continue following the submission of this planning application update and are reported in the updated Section 106 Heads of Terms. These discussions do not impact on this ES chapter or technical appendices.</p> <p>Further consultation with Mersey Travel regarding the corraling area has taken place since the planning application consultation response was issued. This included the following:</p> <ul style="list-style-type: none"><li>■ Both parties agree in principle the need for the facility;</li><li>■ Dialogue to continue following planning resubmission;</li><li>■ The requirement to agree these items in full will be secured under the Section 106 agreement or otherwise conditioned to any approval granted.</li></ul> <p>Regarding securing of the provision of an appropriate City Centre terminal facility, this was generally agreed in a meeting with Merseytravel and Liverpool City Council that there is no obligation on the Club to provide this facility. A new facility is in process of being trialled by LCC at Commutation Row. This issue will likely be resolved years before the stadium opens. The facility is needed to serve Goodison Park &amp; Anfield.</p>

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CONSULTEE	COMMENTS	WHERE ADDRESSED
	<ul style="list-style-type: none"><li>■ <i>Applicant to continue appropriate collaboration with Rail Industry and Merseytravel on suitable means for enhancing potential rail travel to and from the proposed stadium beyond the provisions currently set out for delivery for 2023, for a period of no less than 5 years thereafter.’</i></li></ul>	
Canals & Rivers Trust (C&RT)	<p>The Canal &amp; River Trust provided various comments on the application proposals, including the following:</p> <ul style="list-style-type: none"><li>■ The require a condition relating to a pollution prevention plan.</li><li>■ They require a legal agreement to secure 200m of new towpath adjacent to the offside of the Stanley Lock flight on the Leeds &amp; Liverpool Canal and a package of signage/wayfinding to promote sustainable transport routes to the site.</li><li>■ They advised the infill of BMD is regrettable but the C&amp;RT recognise that the dock is not one of their assets.</li><li>■ C&amp;RT feel that the stadium would be visible from the Stanley Lock flight steps.</li><li>■ C&amp;RT generally agree with the conclusions of the Heritage Statement regarding their listed assets.</li><li>■ They requested that the Council secure the mitigation proposed within the application e.g. creation of the water channel, materiality etc.</li><li>■ The Heritage Statement notes that one of the public benefits is opening up the WHS and the C&amp;RT consider this to include access to the canal system.</li><li>■ They advise the existing towpath arrangements would not be suitable for acces for match day / event days and would increase health and safety risks and potential liability upon the Trust. Propose creation of new 200m towpath with at grade crossing. Initial estimates cost this at £250,000. The towpath works would be required prior to the first use of the stadium.</li><li>■ They advise it is unclear how the link to the rest of the Liverpool Waters River Walk would be delivered. Requested that the Council ensure that this link is delivered.</li><li>■ C&amp;RT advise the proposed infilling of BMD should not impact the water levels with the dock/navigation via the Liverpool link. The Trust wish to be included within the Pollution Response Plan - to be secured via a condition.</li></ul>	<p>A detailed response was issued back to the Canals &amp; Rivers Trust (CBRE Limited, 9<sup>th</sup> July 2020) which confirmed that the applicant did not consider the request for a financial contribution towards enhancement of the existing canal footpath was appropriate having regard to Reg. 122(2) of the Community Infrastructure 2010 Regulation. There are consequently no implications for the content of the ES.</p>
Sefton Council	<p>Sefton Council is supportive of the proposal in principle. They advise they would welcome further dialogue to understand the extent of the economic benefits and opportunities, and state there is no specific reference to Bootle/Sefton in the Socio-Economic Impact Assessment.</p> <p>Sefton Council also comment on the following:</p> <p><i>‘Air Quality: Only 2 receptors within the Miller’s Bridge AQMA have been modelled and the impact affecting the nearest receptors to the Millers Bridge junction has not been modelled/determined. Consideration of the impact upon this receptor should be given. There is more recent monitoring data from 2018 (not 2017) which is now available and should be used.</i></p> <p><i>Highways: Information regarding the impact on Bootle is requested, including additional vehicle movements and parking demand in Bootle. Sefton Council should be consulted on the Full Construction Management Plan and the Travel Plan. Sefton Council should be invited to be a member of the BMD Transport Working Group.’</i></p>	<ul style="list-style-type: none"><li>■ The socio-economic assessment presented in Chapter 20, ES Volume III is based on data from the Economic Impact Assessment which has been undertaken at a sub-regional level, i.e. Liverpool City Region (LCR). The LCR is made up of the combined authorities of Liverpool, Halton, Knowsley, Sefton, Wirral and St Helens. Clarification has been added to Chapter 20, ES Volume III.</li><li>■ The Air Quality comments are addressed in the Air Quality Assessment (Appendix 8.1, ES Volume III)</li><li>■ The Highways comments have been addressed in ES Volume III, Appendix 7.2 (Transport EIA Technical Appendix).</li></ul>



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CONSULTEE	COMMENTS	WHERE ADDRESSED
Liverpool John Lennon Airport (Liverpool Airport Limited)	The proposed works will have no impact on operations at Liverpool John Lennon Airport and therefore they have no objections to the application. They request than an informative is placed on the application stating: <i>‘The contractor/developer should consult Liverpool John Lennon Airport for permission to work for the crane(s) that is (are) to be used to construct the development. A Instrument Flight Procedures (IFP) assessment will need to be carried out on the crane(s). Any costs incurred in carrying out this assessment will be met by the developer.’</i>	No specific updates to the ES required
Natural England	<p>Further information required to determine impacts on designated sites (details provided in letter provided in Appendix 12.1, ES Volume III). NE also raised numerous comments related to the shadow HRA. These included:</p> <ul style="list-style-type: none"><li>■ Clarity required in relation to construction methodology within the Shadow HRA.</li><li>■ Clarity required regarding inclusion of fish species within Shadow HRA, as fish do not form qualifying feature of any Natura 2000 site.</li><li>■ Clarity required regarding monitoring of contaminants within the dock during construction phase assessment within the Shadow HRA.</li><li>■ Further information required in relation to vessel transfer of infill material within the shadow HRA.</li><li>■ Clarification on relevant designated sites and associated qualifying features required within the Shadow HRA.</li><li>■ Revision to the Assessment of Likely Significant Effects stage of the Shadow HRA where mitigation may be implemented.</li><li>■ Where insufficient evidence is provided to rule out likely significant effects further information is required either at ALSE or AA stage of the Shadow HRA.</li><li>■ Additional projects and plans to be included within in combination assessment of the Shadow HRA.</li><li>■ Assessment in relation to wintering birds requires further justification within the Shadow HRA.</li><li>■ Further information required regarding bird use within the wider Liverpool Waters scheme required to justify conclusions drawn within the Shadow HRA.</li></ul> <p>In addition, further information was requested in relation to bat mitigation measures within the ES chapter. NE also provided standard advice regarding landscape, protected species, local sites and priority habitats/species, environmental enhancement (net gain), access &amp; recreation, rights of way, England Coastal Path, Biodiversity duty.</p>	<p>In response to the comments from NE, Technical Appendix 4 of ES Appendix 12.1, ES Volume III, has been updated with the following assessment work and clarifications:</p> <ul style="list-style-type: none"><li>■ The construction works description has been amended in Technical Appendix 4, section 1.3.</li><li>■ Clarity has been provided explaining that fish species within the application site and wider dock provide prey species that support some of the qualifying features in Technical appendix 4, section 4.2.</li><li>■ Relevant section of the Shadow HRA have been amended to demonstrate that contamination levels are sufficiently low enough to remove the potential impact on designated sites. Where necessary appropriate measures have been included within the assessment to mitigate for contamination. This is documented in Technical Appendix 4, section 4.2; and section 6.6.</li><li>■ Detailed assessment of potential impacts of vessel movement has been undertaken, which is included in Technical Appendix 4, section 4.2.</li><li>■ Further detail is provided throughout the updated Shadow HRA regarding which sites and their associated qualifying features are assessed at each stage of the assessment. This is provided in Technical Appendix 4, section 4.2 onwards.</li><li>■ Clarification has been added to the assessment to confirm no mitigation is required or where mitigation is required for a particular pathway this is progressed to the Appropriate Assessment stage, which is included in Technical Appendix 4, section 4.2 and section 6.6.</li><li>■ Revisions have been made to relevant pathways of effect assessments at both Assessment of Likely Significant Effects (ALSE) and Appropriate Assessment (AA) stage in Technical appendix 4, section 4.2; and section 6.6.</li><li>■ Revisions have been made to the in combination assessment at both ALSE and AA stage in Technical Appendix 4, section 4.2; and section 6.6.</li><li>■ Revision have been made to the wintering bird assessment within the Information to Inform Appropriate Assessment in Technical Appendix 4, section 6.3.</li><li>■ Data from Liverpool Waters SEMP has now included in Technical Appendix 4, section 6.1.</li><li>■ Mitigation measures in line with Bat Mitigation Class Licence are described in Appendix 12.1, Section 12.12.14.</li></ul> <p>The Aquatic Ecology Assessment has also been updated (ES Volume II, Chapter 13; and ES Volume III, Appendix 13.1)</p>
Merseyside Environmental Advisory Service (MEAS)	<i>‘Terrestrial Ecology: Various comments are raised in relation to the Habitats Regulations Assessment (HRA). These comments are provided in full in the shadow HRA (Appendix 4 of ES Appendix 12.1, ES Volume III).</i>	<ul style="list-style-type: none"><li>■ The comments raised with regard to the HRA have been addressed within the shadow HRA report (Appendix 4 of ES Appendix 12.1, ES Volume III).</li><li>■ A Biodiversity Net Gain assessment is provided in Appendix 5 of ES Appendix 12.1, ES Volume III).</li></ul>

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CONSULTEE	COMMENTS	WHERE ADDRESSED
	<p><i>The bat surveys confirmed the presence of low numbers of common pipistrelle roosting bats within the pump house (B1) in the north-eastern corner of the site. The building is due to be refurbished as part of the proposed development. As the presence of roosting bats has been confirmed, the Council is required to undertake the three test assessment prior to determination of the application and refurbishment works to the building will have to be undertaken under a Natural England EPS licence or the bat mitigation class licence CL21. Section 12.7 and Appendix 12.1 of the Environmental Statement provides brief outline of what the proposed bat mitigation will entail, i.e. provision of an alternative roost, supervision of works to roosting areas and provision of five additional roosts. However, to enable the Council to complete the three test assessment further details of the proposed bat mitigation are required prior to determination (e.g. methodology, timings, locations and specifications of alternative roosting provision).</i></p> <p><b><u>Landscaping and habitat creation:</u></b> <i>The application site lies adjacent to the Mersey Estuary Nature Improvement Area (NIA), although the site provides few opportunities for the creation of additional habitats. The proposed landscaping of the site should therefore ensure that opportunities for biodiversity enhancements are maximised. The submitted Landscape Softworks Plan (MEIS Architects, 4 September 2019, BMD001-PLA-L1-00-DR-L-2000) shows the limited landscape planting which will occur in the eastern part of the site. However, this is to be undertaken entirely with either exotic species or those which are not locally native. I advise that the planting of tall growing trees like Scot’s pine (Pinus sylvestris) is avoided as, when mature, they may provide opportunity for roosting and nesting corvids which could predate the ground-nesting birds known to be present in the adjacent docklands. Suitable alternatives in that location include rowan (Sorbus aucuparia), native alder (Alnus glutinosa), wild cherry (Prunus avium). I advise that a revised landscaping scheme is secured by a suitably worded planning condition.</i></p> <p><b><u>Aquatic Ecology:</u></b> <i>The nature conservation value of the benthic communities and habitats within BMD is considered negligible given the disturbed environment (industrial dock), the presence of invasive non-native species and the absence of species of conservation importance. I will defer to the Environment Agency on this matter, although I note that starlet sea anemone (Nematostella vectensis) were not recorded during sampling and will not, therefore, place any constraints on the proposed development. Starlet sea anemone, listed on Schedule 5 of the Wildlife and Countryside Act 1981 (as amended), was previously recorded in the vicinity of Princes Dock to the south.</i></p> <p><b><u>Construction Environmental Management Plan (CEMP):</u></b> <i>I advise that the applicant prepares a Construction Environmental Management Plan (CEMP) document to manage and mitigate the main environmental effects during the construction phases of the proposed development. The CEMP should address and propose measures to minimise the main construction effects of the development and, amongst other things, should include details of ecological mitigation, construction and demolition waste management, pollution prevention and soil resource management. The CEMP would normally be expected to include the agreed method statements to mitigate or avoid adverse environmental impacts. The CEMP should expand upon the measures outlined in the submitted Construction Method Statement for avoiding and minimising effects of noise and construction related pollutants during the works. The CEMP should also include, but not be limited to, the following:</i></p> <ul style="list-style-type: none"><li>■ <i>Detailed fish capture and translocation methodology;</i></li><li>■ <i>Details of the water quality monitoring of Nelson Dock, including the parameters which will be monitored and the frequency of monitoring. The water quality triggers / thresholds that will stop infilling works should be specified; and</i></li></ul>	<ul style="list-style-type: none"><li>■ Further bat survey information has been provided in the Bat Survey Report (Appendix 3 of ES Appendix 12.1, ES Volume III).</li><li>■ A revised Landscaping Design has been submitted alongside the planning application.</li><li>■ A Construction Management Plan has been provided in ES Appendix 4.1, ES Volume III, which includes various environmental control measures to reduce impacts during the construction stage.</li><li>■ In response to the archaeological comments, a building survey and evaluation report has been included in Appendix 19.2, ES Volume III.</li><li>■ The Construction Waste Management Strategy is included as Appendix 4.3, ES Volume III.</li><li>■ An Energy Statement (document ref: BMD01-BHE-ZZ-XX-RP-YN-0300) and Sustainability Statement have been produced and submitted as standalone documents as part of the planning application for the proposed development (Buro Happold, 2020).</li></ul>

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CONSULTEE	COMMENTS	WHERE ADDRESSED
	<p>■ Measures that will be undertaken to avoid harm to roosting bats and breeding birds.</p> <p><b>Archaeology:</b> Suggest two planning conditions -</p> <ol style="list-style-type: none"> <li>1. No development shall take place until the applicant has submitted a written scheme of investigation for archaeological work for approval in writing by the local planning authority. The work shall be carried out strictly in accordance with the approved scheme. And,</li> <li>2. 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.</li> </ol> <p><b>Site Waste Management:</b> The proposal is major development and involves excavation, demolition and construction activities which are likely to generate significant volumes of waste. Policy WM8 of the Merseyside and Halton Waste Joint Local Plan (WLP), the National Planning Policy for Waste (paragraph 8) and Planning Practice Guidance (paragraph 49) apply. The Construction Management Statement (Appendix 4.1) refers to production of a Resource Management Plan and Materials Management Plan for the proposed works. This is welcomed and these can be secured using suitably worded conditions. This information could be incorporated into the proposed Construction Environment Management Plan.</p> <p>Reference is made to a Construction Waste Management Strategy (Appendix 4.3) but this did not appear on the planning portal.</p> <p><b>Sustainability and Low Carbon Energy:</b> Both section 15 of the Design and Access Statement (The People's Project MEIS dated December 2019) and the Sustainability Statement (Buro Happold Engineering Doc Ref: 0040026 Rev 01 dated December 2019) provide details of how sustainability has been addressed through the design process including a solar photovoltaic array, connection with the proposed district heat network for Liverpool Waters alongside resource efficiency measures. This is sufficient to demonstrate compliance with UDP policies GEN8 (Environmental Protection) and HD21 (Energy Conservation) and emerging Local Plan policies R7 (Renewable and Low Carbon Energy) and R9 (Solar Panels) subject to heritage and visual elements being satisfactorily addressed. The Sustainability Statement should be secured by a suitably worded condition as an approved document.'</p>	
LCC Tree Officer	Proposed tree planting species and planting sizes/clear stem heights are acceptable. Further details required which can be secured by planning condition. This relates to details of proposed tree planting pits, implementation and maintenance of trees and landscaping on site.	Updated landscape drawings have been submitted alongside the planning application and taken into account in the Ecology and Wind Micro-Climate assessments.
LCC Highways	<p>Transport Assessment — Advised the review of Policy documentation lacks the following existing policy documentation, which do have significance in terms of the Transport Assessment:</p> <ul style="list-style-type: none"> <li>■ LCRCA Transport Plan (2019) — replaces the LCR Transport Plan for Growth (2015).</li> <li>■ Ten Streets SRF.</li> <li>■ LCRCA Local Cycling and Walking Infrastructure Plan (2020) — Note that this was prepared after the submission of the planning application.</li> </ul> <p>They also state</p> <p><i>'It is noted in the TA that the GHS/ Leeds St Junction is not a concern as it is proposed to ask UTC to take control of the junction on match days. It is presumed this is to introduce an "all red to traffic" phase periodically. However, it is not indicated that EFC will cover the cost of this UTC work, and it is not clear if marshals are proposed at the junction. Is it anticipated this will be under active UTC Control, and if so, how will the cost of the personnel in the UTC Control Room be covered?'</i></p>	<p>The Ten Streets SRF is included in the Transport Assessment within 6.3 of Appendix 7.1, ES Volume III. The remaining requests are included in Section 3 of the Transport Assessment.</p> <p>Discussion on cost of UTC monitoring and control of the junction to be met by the Club is ongoing. The requirement to agree these items in full will be secured under the Section 106 agreement or otherwise conditioned to any approval granted. It should be noted that the junction should not be treated in isolation. The area of Derby Road and Great Howard Street corridors will also need to be monitored and a UTC plan created for the corridor.</p> <p>Post submission discussion with LCC UTC and Highways have taken place. Parties agreed that monitoring of the junction in the early games post stadium opening would reveal whether physical changes should be made to the junction. The junction will be under UTC control on match days. LCC indicated that monitoring should inform any potential changes.</p>

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CONSULTEE	COMMENTS	WHERE ADDRESSED
	<p><i>‘Section 1.12.13 indicates that the GHS/ Leeds St Junction will be reviewed by LCC post-planning submission, to assess if removing guardrail would assist with the movement of pedestrians.’</i></p>	<p>Pedestrian and lighting audit may be undertaken following planning submission to review the areas specified by LCC to inform a review of whether improvements are necessary. This is noted in Section 11.18 of Appendix 7.1, ES Volume III.</p>
	<p><i>‘Section 4.5.10 discusses street lighting. Has any independent assessment been undertaken on key routes which have not fallen within the NLKC scheme. Furthermore an audit of pedestrian facilities and current condition of Blackstone Street should be considered. In additional review of pedestrian facilities where taxi ranks and bus stops are proposed should be undertaken.’</i></p>	<p>Post submission discussions and workshop with LCC cycle officer, inclusivity officer, planning and highways officer revealed a preferred scheme. Plan in Appendix I of the Transport Assessment (Appendix 7.1, ES Volume III) is based on the agreed principles.</p>
	<p><i>‘Section 5 deals I with the proposed changes to the new segregated cycleway installed under the NLKC Scheme, on Regent Road, as it passes the stadium site. Appendix I also includes a drawing of the proposed changes to this cycleway. The proposals are not adequately developed to allow an assessment of mitigation to be made. The cycleway must be continuous as it passes the stadium, in segregated format, but must also be designed in such a way that it can accept high quantities of pedestrian movements “across it” on Match Days.’</i></p>	<p>New swept path analysis is provided taking into account comments and new Regent Road Scheme. Included as Appendix H of the Transport Assessment (Appendix 7.1, ES Volume III). Changes to the Regent Road Scheme mean that now vehicles do not overrun the footway.</p>
	<p><i>‘Section 5.7.2 indicates that for large vehicles to access the stadium, they would be required to drive over the footways on Regent Road. This will not be acceptable, and proposals to amend the highway layout to ensure all vehicle movements can be accommodated on-carriageway are essential.’</i></p>	<p>Further detail on the cycle parking has been provided in Section 5.3 &amp; 5.6 of the Transport Assessment (Appendix 7.1, ES Volume III).</p>
	<p><i>‘It is not clear how the proposed number of cycle parking spaces has been arrived at. Furthermore, the layout and location of the proposed cycle parking is not included in any detail. There is also no mention of motorcycle parking being provided.’</i></p>	<p>The car parking spaces are not marked out for urban design reasons and the need for some areas of the stadium to remain flexible. The Parking Management Strategy can be agreed as a condition following any planning approval.</p>
	<p><i>‘It is proposed that some car parking spaces are not formally marked out on site. A Parking management strategy will be required so that how these spaces will be managed can be fully understood.’</i></p>	<p>A Technical note has been prepared on modelling which addresses the issues of the Cruise Terminal MSCP. This is now included as Appendix L of the Transport Assessment (Appendix 7.1, ES Volume III).</p>
	<p><i>‘We now know the Cruise Terminal MSCP will not go ahead in the previously proposed location. Can the modelling work be reviewed and updated with this traffic taken out, to see what the effect is? Would it be feasible to sign the traffic approaching from the north, to turn right at the junction previous to Blackstone Street to reduce pressure on it?’</i></p>	<p>Regarding arbitrary time limits for vehicles, whilst 1 hour before kick off appears reasonable, the post match exit time set at 45 minutes could potentially delay traffic exiting when it is actually safe for them to do so. This impacts on the long term flexibility of the site. We suggest this does not require its own planning condition. Can be included in Event Management Plans. An alternative suggested wording in the EMP transport would be 'no vehicles shall enter or exit until the site security officer &amp; Police agree it is safe to’.</p>
	<p><i>‘In the section on car parking, it is indicated that entry to and exit from the MSCP within the stadium grounds will be “restricted” close to kick-off and immediately post-match. The movement of cars within the stadium grounds should be prohibited well before kick-off and for a period after the match has ended. It is suggested that the Strategy, or an associated planning condition, specifically deals with prohibiting cars being allowed to move around within the stadium grounds for specific periods of time on match days.’</i></p>	<p>Scheme drawings for these items included in the planning application. Those not included are subject to results of any pedestrian / lighting audit and concept design. Detail of these schemes to be agreed post planning resubmission and agreed Works to be conditioned to any approval granted.</p>
	<p>In addition to the highway works already identified, LCC requested the following:</p> <ul style="list-style-type: none"><li>■ Taxi-ranks on Boundary Street, consider making this match day only, with marshals</li><li>■ Dublin Street Taxi Rank</li></ul>	



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CONSULTEE	COMMENTS	WHERE ADDRESSED
	<ul style="list-style-type: none"><li>■ A scheme of works on Sandhills Lane to redesignate kerbside space to taxis and buses, whilst retaining use of much of the kerbside space for general parking on non-match days;</li><li>■ Remove deterrent paving on GHS and improve footway at junction with Blackstone St;</li><li>■ General kerbside parking and loading restrictions, outlined in Appendix I of TA, for the industrial area to the north of the stadium, exact details to be reviewed and submitted separately; and</li><li>■ Kerb and layby changes at site access points.</li></ul>	
LCC Highways	Match Day Transport Strategy — Discussion on contributions towards parking enforcement is recommended.	Discussion with LCC Parking Services has taken place post submission: Contribution is not required as no contribution is made by the Club or LFC for existing matches.
LCC Highways	Transport Assessment / LCC Parking Services — The area marked 'Industrial Area' in the TA should become part of the proposed controlled parking zone. Without parking controls here there is a risk of adverse impact on businesses in terms of parking and congestion. The FMPZ may be secured via planning condition.	This area is now included within the proposed controlled parking area. See Section 11.5 of the Transport Assessment (Appendix 7.1, ES Volume III). Implementation of parking controls is included in Section 106 Heads of Terms. The requirement to agree these items in full will be secured under the Section 106 agreement or otherwise conditioned to any approval granted.
LCC Highways	<p>LCC Inclusivity — LCC request:</p> <ul style="list-style-type: none"><li>■ Coach parking and taxi ranks closer to stadium and ability for coaches to drop off close to stadium;</li><li>■ Increased allocation of disabled parking (based on initial revised scheme of 37 spaces);</li><li>■ Identification of where disabled supporters may park their vehicles if unable to access the stadium’s car park?; and</li><li>■ Parking Management Strategy.</li></ul>	<p>For security and pedestrian movement reasons coach parking or taxi ranks can not be provided closer to the stadium. Following consultation with LCC Inclusivity and EDSA the Club is now proposing:</p> <ul style="list-style-type: none"><li>■ Free shuttle services from Sandhills Station and Stanley Park car park for disabled supporters (to be secured by planning condition);</li><li>■ Priority parking for coaches with high proportion of disabled supporters closer to the stadium than other coaches;</li><li>■ Increased stadium parking provision of 54 accessible bays</li><li>■ Parking Management Strategy to be provided as planning condition.</li></ul>
LCC Highways	<p>Interim Staff Travel Plan — it is suggested that a period of 5 years be allowed for the Travel Plan to be fully embedded and any benefits associated with reduced reliance on the Private Cars by staff are realised. The Travel Plan should therefore be reviewed annually and amended accordingly; with Travel Surveys undertaken each year and monitoring of sustainable transport uptake undertaken on an ongoing basis.</p> <p>LCC request the document should:</p> <ul style="list-style-type: none"><li>■ Name an appropriate Travel Plan Coordinator.</li><li>■ Include travel survey information on staff travel at Goodison Park.</li><li>■ Access on foot should be separated from access by bicycle in the baseline section.</li></ul> <p>They also request more detail on the staff shuttle bus, stating <i>‘Figure 6 seems to indicate there are “key bus stops” on Great Howard Street, which are not served by any buses — this is perhaps an oversight, but the routes need to be included such that their usage can be considered by staff.’</i></p>	<p>The suggested time period for the travel plan is agreed and this could form a planning condition to any approval granted.</p> <p>A Travel Plan Coordinator has now been named and the document contains travel survey information. The baseline information now separates pedestrian access and access on foot.</p> <p>Staff shuttle bus frequency and operation will be more clearly defined following any planning approval. At present the demand for the service is not known. This will be monitored following planning approval. Bus stops on Great Howard Street may be used by any new future service so it is appropriate to keep these in Figure 6 of the Travel Plan.</p>
LCC Inclusive Design Officer	<p>Extensive consultation comments received which covered the following:</p> <ul style="list-style-type: none"><li>■ Pre-application consultation</li><li>■ Transport</li><li>■ Pedestrian approaches and public realm</li><li>■ Stadium Approaches</li><li>■ Stadium Entrances</li></ul>	As detailed in the submitted Design & Access Statement Addendum (Pattern Design) and Chapters 3 and 5 of the ES (Volume II), several changes have been made in response to comments from the Council’s Inclusive Design Officer. The number of wheelchair positions has increased significantly. Entrances will conform to the required standard and there are no revolving doors in the scheme (internally or externally). A signage and wayfinding strategy is to be developed to ensure that sight lines, lighting, visual contrast and legibility are appropriate.

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CONSULTEE	COMMENTS	WHERE ADDRESSED
Victorian Society	<ul style="list-style-type: none"><li>■ Toilets</li><li>■ Accessible viewing seats</li><li>■ Signage and wayfinding</li><li>■ Players facilities</li><li>■ Media Room</li><li>■ Internal concourses</li><li>■ Internal and external stairs</li><li>■ Further comments re. Coach Parking, drop off-pick up arrangements, bus travel, taxi ranks, accessible parking, engagement with EDSA and ongoing monitoring through the Transport Working Group.</li></ul>	<p>Corduroy hazard warning tactile paving has been increased in depth from 400mm to 800mm to make it more legible. Two dog spending areas have been provided to ensure relieving stations for assistance dogs are available.</p> <p>Junctions between gradients and steps have been improved so that slopes are less steep than 1:20 and the edge treatment of the steps down to the water channel (which also provides seating) has been developed with upstands rather than a feathered edge. Positions have been incorporated for wheelchair users that allow for lateral transfer to the seats or as space adjacent to seating. Access to the West Terrace is provided by internal lifts within the stadium. There are also seating spaces suitable for wheelchair users at the bottom and top of the terrace.</p> <p>EDSA have been consulted regarding the transport strategy and as a result of this consultation an accessible minibus (pre-booked) service has been proposed to link users to the stadium from Stanley Park car park and an additional route from Sandhills station.</p> <p>The number of accessible car parking spaces on site has increased following consultation with the Council’s Inclusive Design Officer.</p> <p>Following consultation changes have been made to improve horizontal and vertical circulation. A second (lower) handrail has been added in staircases that serve the shop, the family tribune and areas of the public realm.</p> <p>Facilities within the stadium have been improved, including changes to the press conference room, concession counters and the provision of storage facilities for mobility aids close to easy access and amenity seats. The provision and arrangement of toilet facilities has also improved following consultation with LCC. This includes provision for accessible WCs, ambulant cubicles, gender neutral WCs, family WCs and Changing Places facilities.</p>
	<p><b>Hydraulic Engine House:</b> In the absence of detailed proposals it is not yet possible to assess the overall impact of the development on the significance of the building.</p> <p><b>Regent Road Dock Wall:</b> The number and density of new openings proposed is relatively high and will cause a great deal of harm to the significance of the wall.</p> <p><b>Bramley-Moore Dock Walls:</b> The harm to the Grade II listed BMD wet walls is considered to be substantial in nature.</p> <p><b>World Heritage Site:</b> The infilling of the dock will mean its total loss as an extant wet dock and hence severe harm to the OUV of the WHS. It is not considered substantial in the extent of the WHS but it does represent another addition to the harm that has already accrued through insensitive development.</p> <p><b>Alternative Sites Assessment:</b> This assessment is extensive but requires further clarification. The ASA does not explain why existing designations such as green space or employment land are more compelling than the protection of heritage assets. BMD should be included as a site in the ASA to allow a comparison between the application site and other sites.</p>	<p>Comments are addressed in the following chapters and technical reports:</p> <ul style="list-style-type: none"><li>■ Alternative Site Assessment (ES Volume III, Appendix 5.1)</li><li>■ New heritage ES chapter has been prepared (ES Volume II, Chapter 18) along with the associated Heritage Statement (ES Volume III, Appendix 18.1) and Heritage Impact Assessment Report (ES Volume III, Appendix 18.2).</li><li>■ The Heritage Asset Survey (ES Volume III, Appendix 18.6) has also been updated for the revised submission. The originally submitted Artefacts Appraisal that was included in ES Volume III of the 2019 submission has been superseded by the updated Heritage Asset Survey and does not form part of the amended submission.</li><li>■ Townscape &amp; Visual Impact Assessment (ES Volume II, Chapter 17 and ES Volume III, Appendix 17.1).</li><li>■ Updated Archaeology assessment (ES Volume II, Chapter 19; and ES Volume III, Appendix 19.1).</li></ul>

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CONSULTEE	COMMENTS	WHERE ADDRESSED
Environment Agency (EA)	<p><b>Mitigation:</b> Propose a dock retaining wall survey is carried out to mitigate harm; avoid decorative relocation of surviving dock-related structures; careful design and deconstruction of Dock Wall to create openings; and commitment from LCC not to allow loss of further dock waterbodies.</p> <p><b>Conclusion:</b> Withhold consent until further information and amendments to the documents are received.</p> <p><b>Biosecurity plan:</b> Invasive non-native species have a negative impact on native species and habitats and they cost the British economy approximately £1.7 billion per year. The spread of certain invasive non-native species is prohibited under Schedule 9 of the Wildlife &amp; Countryside Act 1981. It is important invasive non-native species are not spread around the proposed development site or to other locations. It is important they are not brought on to the site or transported off site, for example on equipment or Personal Protective Equipment.</p> <p><b>Fisheries:</b> The infill Methodology states (S2.2), “It is necessary to rake the dock deposits in advance of the dock infilling (but after the first fish removal has been undertaken)”. Removal of the fish without dewatering will be difficult and so, as noted in the Water Framework Directive (WFD) final document, it is inevitable some fish will be present during infill. As such a route for fish to leave the dock and relocate to a neighbouring dock should be made available. Prior to the development no raking and infilling of Bramley Moore Dock should commence until a fish rescue plan that details how fish will be protected, has been submitted to and approved in writing by the Local Authority. The works shall be carried out in accordance with the approved fish rescue plan.</p> <p>The WFD final document notes on page 54 that: “The dredged material will be fluidised with water from the River Mersey, which should be subject to an abstraction licence with consideration given to the seasonal occurrence of migratory species such as European eel”.</p> <p>This is correct and the abstraction will require physical screening to 2mm aperture size in the spring and summer, and 8mm in the autumn and winter. It is likely this will be conditioned on the abstraction licence. Floating islands would improve the biodiversity and fish friendliness of the canal. This is something the developer needs to consider.</p> <p><b>Flood Risk:</b> The proposed development will only meet the National Planning Policy Framework’s requirements in relation to flood risk if the following planning condition is included. The development shall be carried out in accordance with the submitted flood risk assessment (ref: 040026 Revision 06 dated 20th December 2019).</p>	<p>The comments received from the EA have been addressed in the following chapters and technical reports:</p> <ul style="list-style-type: none"><li>■ Chapter 10 (Ground Conditions), ES Volume II;</li><li>■ Chapter 11 (Water Resources), ES Volume II;</li><li>■ Chapter 12 (Terrestrial Ecology), ES Volume II;</li><li>■ Chapter 13 (Aquatic Ecology), ES Volume II;</li><li>■ Appendix 4.1 (Construction Management Plan), ES Volume III;</li><li>■ Appendix 11.3 (Flood Risk Assessment), ES Volume III; and</li><li>■ Appendix 11.7 (Water Framework Directive Assessment (WFD)), ES Volume III.</li></ul> <p>Regarding abstraction during the proposed dock infill process, it is noted that it will not be physically possible to pump the sand into the dock with 2mm mesh on the intake. This will be dealt with as part of the abstraction license process between the specialist appointed marine contract (Boskalis) and the EA. It should also be noted that it is most likely that all vessels operating in Liverpool harbour be equipped with an engine cooling water inlet with intake grate/grid rather than a 2mm mesh wire.</p>

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CONSULTEE	COMMENTS	WHERE ADDRESSED
	<p><b>Contaminated Land:</b> We are aware the proposed development site is located in an Environmentally Sensitive location being above a Principal Aquifer and immediately adjacent to the River Mersey Estuary. The historic land use as dock facilities dating back over 150 years have introduced elevated concentrations of contamination to the ground and local shallow groundwater that could pose a risk to the aquatic environment if left unaddressed. Whilst we recognise the importance of this proposed development, we also recognise the local importance of the aquatic environment at this place and the contribution it makes to the local community heritage. As such where elevated concentrations of contamination have been identified, these should be delineated properly and suitably remediated to lessen or remove the risk of subsequent future contamination of the aquatic environment. We also have concerns regarding the contamination concentrations of the dock deposits within the current Bramley-Moor dock and the proposed scheme to keep them in situ may not be adequate as the Principal Aquifer is at or about the same level of these deposits and therefore in likely continuity. Whilst we do not have any concerns to these sediments remaining in situ we feel more assessment work is required to ensure their continued location is assessed as being suitable. The National Planning Policy Framework (NPPF) paragraph 170 states the planning system should contribute to and enhance the natural and local environment by preventing both new and existing development from contributing to or being put at unacceptable risk from, or being adversely affected by unacceptable levels of water pollution. Government policy also states that planning policies and decisions should also ensure that adequate site investigation information, prepared by a competent person, is presented (NPPF, paragraph 178(c)).</p> <p>No development approved by this planning permission shall take place until a remediation strategy that includes various components listed to deal with the risks associated with contamination of the site shall each be submitted to and approved, in writing, by the local planning authority.</p> <p>No infiltration of surface water drainage into the ground where land contamination is known or suspected to be present is permitted other than with the express written consent of the local planning authority, which may be given for those parts of the site where it has been demonstrated that there is no resultant unacceptable risk to controlled waters. The development shall be carried out in accordance with the approval details.</p> <p>Piling or any other foundation designs using penetrative methods shall not be permitted other than with the express written consent of the local planning authority, which may be given for those parts of the site where it has been demonstrated that there is no resultant unacceptable risk to groundwater. The development shall be carried out in accordance with the approved details.</p> <p>Prior to any part of the permitted development/each phase of development being occupied/brought into use, a verification report demonstrating the completion of works set out in the approved remediation strategy and the effectiveness of the remediation shall be submitted to, and approved in writing, by the local planning authority. The report shall include results of sampling and monitoring carried out in accordance with the approved verification plan to demonstrate that the site remediation criteria have been met.</p>	



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CONSULTEE	COMMENTS	WHERE ADDRESSED
Environmental Health	Would propose standard LCC construction hours (0800-1800 Monday-Friday, 0800-1300 Saturdays) with activities required to take place outside these times to be requested and justified. LCC is satisfied in respect of operational lighting and that the Ventilation & Refrigeration document has addressed issues of fumes from food provision elements of the proposal. The EHO suggested a standard condition regarding noise emissions from plant. Each phase of the LW scheme will need an up-to-date noise assessment to determine a suitable package of acoustic insulation. Suggest curfews are in place for non-football related activities to 11 / 11.30pm.	Addressed in Chapter 9 (Noise & Vibration), ES Volume II, and within Appendix 4.1 (Construction Management Plan), ES Volume III
Historic England	<p>The HE response provides feedback regarding significance, impact, the proposed development, BMD, Regent Road dock boundary wall, Hydraulic Accumulator Tower, Stanley Dock Conservation Area, LMMC WHS, policy and their position.</p> <p>HE object to the planning application, <i>‘unless the decision-maker concludes that the proposal is shown to be necessary to secure substantial public benefits, and that these would outweigh the harm to the World Heritage Site and other heritage assets.’</i></p> <p>HE consider that the proposal would result in substantial harm to the significance of the Grade II listed Bramley Moore Dock, through its infilling, and cause a very large harmful impact to a World Heritage Site, an asset of the highest (international) significance, the values of which the UK Government has committed to conserve, protect and explain.</p>	<p>Comments are addressed in the following chapters and technical reports:</p> <ul style="list-style-type: none"><li>■ Alternative Site Assessment (ES Volume III, Appendix 5.1)</li><li>■ New heritage ES chapter has been prepared (ES Volume II, Chapter 18) along with the associated Heritage Statement (ES Volume III, Appendix 18.1) and Heritage Impact Assessment Report (ES Volume III, Appendix 18.2).</li><li>■ The Heritage Asset Survey (ES Volume III, Appendix 18.6) has also been updated for the revised submission. The originally submitted Artefacts Appraisal that was included in ES Volume III of the 2019 submission has been superseded by the updated Heritage Asset Survey and does not form part of the amended submission.</li><li>■ Townscape &amp; Visual Impact Assessment (ES Volume II, Chapter 17 and ES Volume III, Appendix 17.1).</li><li>■ Updated Archaeology assessment (ES Volume II, Chapter 19; and ES Volume III, Appendix 19.1).</li></ul>
Sport England	<ul style="list-style-type: none"><li>■ Sport England provided recognition that the redevelopment of the existing site was considered but not deemed possible due to modern safety standards, land ownership constraints and the proximity of existing housing.</li><li>■ Note that it is imperative that the Club seeks to increase the capacity of the stadium and improve the facilities to compete commercially with top tier EPL and European Clubs.</li><li>■ Sport England made reference to the Kirkby appeal and the Inspector's view regarding the relocation of the stadium.</li><li>■ Sport England support this application as it is considered to meet sport principle no. 6 regarding improvements to existing sport and physical activity provision.</li><li>■ Advise the relocation of the existing stadium to BMD meets the requirements under Exception E4 of Sport England's Playing Field Policy. The response notes the improvements of the facilities associated with the proposed move.</li></ul>	No specific updates to the ES required.
Urban Design	<p>The Urban Design review highlighted the following points:</p> <ul style="list-style-type: none"><li>■ <i>Scheme must show how it is embracing the emerging urban fabric in the immediate area, particularly the south east. Aspirations for how the wider public realm could be improved to help to facilitate increased footfall in the area and drive regeneration must be considered.</i></li><li>■ <i>The proposed PV canopy and use of the western quay will detrimentally impact the appearance of the wider public realm along the River Mersey edge. It will adversely impact the setting of the stadium.</i></li><li>■ <i>Western elevation is monolithic - need to break up brick facade and potentially compartmentalise into defined zones.</i></li><li>■ <i>Disjointed relationship between roof, brick base and ground in places.</i></li></ul>	<p>The comments relating to Urban Design have been addressed in the Design &amp; Access Statement Addendum (Pattern Design, 2020) that has been submitted as part of the planning application as a standalone document.</p> <p>Details are also summarised in ES Volume II, Chapters 3 and 5.</p>

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CONSULTEE	COMMENTS	WHERE ADDRESSED
	<div><div>■ Little ground activation in places meaning that the building does not interact with surrounding public realm sufficiently.</div><div>■ Suggest that landscaping can help to soften the public realm area. Lower level soft landscaping could play a role more widely.</div></div>	
ICOMOS	<p>They advise ‘<i>the proposed development would have a completely unacceptable major adverse impact on the authenticity, integrity and OUV of the property and should not proceed at this location. It is not appropriate for further new developments within the property and its buffer zone to be approved and built until such time as necessary input studies and plans have been completed and the DSoCR endorsed by the WHC. Request name of ICOMOS assessment is changed.</i></p> <p><i>Consultation exercise was ‘fundamentally inappropriate’ because choices were not offered about alterantive new stadium sites and respondents were not properly informed of World Heritage impacts, requirements and implications. ICOMOS disputes that the major adverse impact can in any way be counter balanced by public benefit.’</i></p>	In response to these comments and various post submission design changes, a full new heritage ES chapter has been prepared (Chapter 18, ES Volume II) along with the associated Heritage Statement (Appendix 18.1, ES Volume III) and Heritage Impact Assessment (Appendix 18.2, ES Volume III).
LCC Planning Policy	Comments provided on the ASA Methodology, LCC view of this methodology, LCC view of the site assessments, LCC view on availability, and response to HE comments, including recommendations to ensure a robust ASA.	The Alternative Sites Assessment (ASA) has been revised and is provided in Appendix 5.1, ES Volume III.

Table 2.4  
Summary of Relevant MMO Licence Application Consultation Responses

CONSULTEE	COMMENTS	WHERE ADDRESSED
Historic England	Historic England have advised that the application should be refused, unless the decision-maker concludes that the proposal is necessary to secure substantial public benefits which would outweigh the harm to the World Heritage Site and other heritage assets.	<p>In response to these comments and various post submission design changes, a full new heritage ES chapter has been prepared (ES Volume II, Chapter 18) along with the associated Heritage statement (ES Volume III, Appendix 18.1), Heritage Impact Assessment Report (ES Volume III, Appendix 18.2), Artefacts Appraisal (ES Volume III, Appendix 18.6) , and Heritage Asset Survey (ES Volume III, Appendix 18.7).</p> <p>In addition, a revised TVIA have been completed (ES Volume II, Chapter 17; and ES Volume III Chapter 17.1), and updated Archaeology assessment (ES Volume II, Chapter 19; and ES Volume III, Appendix 18.1)</p> <p>The Socio-Economic assessment provided in ES Volume II, Chapter 20; and ES Volume III Appendix 20.1, provides a review of benefits weighed against the accepted harm.</p>

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CONSULTEE	COMMENTS	WHERE ADDRESSED
North Western Inshore Fisheries and Conservation Authority	<p>The authority do not feel it is appropriate to use the presence of Invasive Non-Native Species (INNS) in the wider dock system and Mersey Estuary, or the presence of commercial shipping traffic, as a mitigating factor in reducing the potential risk of INNS being displaced into the wider environment. Each waterbody may hold different species and legislation is in place to prevent the release of INNS into the environment. The WFD assessment mentions a Biosecurity plan as a planning condition but it was not clear where this could be found in the provided documentation. The authority acknowledges the mitigation proposed in the construction methodology, if the biosecurity plan and proposed mitigation meet the requirements of the appropriate SNCB the concerns of the NWIFCA would be allayed.</p> <p>The authority thinks there is still potential for significant noise generation from the proposed infill activity over a time scale potentially significant to species in the Mersey. NWIFCA do not consider it appropriate that noise generation from existing activities are used to mitigate risk. NWIFCA agree that there will be some tolerance of species in the Mersey to noise generated by daily shipping and recreational activities. However noise, although not directly additive, is cumulative and species may not be as tolerant where noise is generated from a location not usually utilised. NWIFCA strongly suggest that the project considers the time of year that the noise is generated and that other noise generating activities are taken in to account when planning the activity. E.g. the constructors could avoid the winter when the Mersey provides an important nursey habitat for cod, aggregate pumping could be scheduled for low water when commercial shipping activities are restricted due to the tides, and communication could be initiated between the noise generating projects identified to avoid concurrent noise generation by development.</p>	<p>A Biodiversity Security Plan (BSP) incorporating a Biosecurity Risk assessment will be prepared in advance of construction and agreed with LCC and the relevant statutory consultees. The pre-emptive preparation of a BSP will help flag up and address any key issues with the removal of species in this area which can support licence applications and be provided to consultees.</p> <p>Efforts to reduce noise during the dock infilling process and wider construction phase will be made as reported in Chapter 9 (Noise &amp; Vibration), ES Volume II; and Appendix 9.1, ES Volume III. Details are also provided in the CMP (Appendix 4.1, ES Volume III).</p>
Cefas - Dredge and Disposal	<p>The Cefas officer advised that the evidence provided for this consultation lacks sufficient detail with regard to the regulation of dredging and disposing of marine sediment. Cefas stated the project description is inconsistent across different documents and is ambiguous in terms of its marine components. Therefore, they request the following clarifications:</p> <ul style="list-style-type: none"><li>‘Detailed description of the purpose of the “Dock Infill” component of the works should be provided. This description must specify whether the proposed works will reclaim land, seal the environment or whether the dock will remain a marine space.</li><li>Sediment data should be provided (in the MMO Results Template) which describes the physical composition of the material to be used as infill, so that requirement for evidence can be properly determined.’</li></ul> <p>They also state:</p> <p><i>‘If the material to be used as infill is determined to be fine sand or silt, then additional evidence concerning the chemical composition of the infill material may be required.</i></p> <p><i>If the dock infill activities will not reclaim or seal off the dock from the marine environment, then designation of a disposal site under OSPAR regulations may be required.</i></p> <p><i>The report states that; “Where concentrations were reported at below the Limit of Detection (LOD), results were interpreted at face value”. It is unclear from the report as to what “face value” means in the scientific context of regulatory assessment for the dredging and disposal of marine sediment. This should be clarified.</i></p> <p><i>The report then describes each analyte group in turn (i.e. metals, tins etc). For each analyte group, the applicant assesses the mean value for each analyte against both Cefas ALs. The applicant should provide justification as to why they have only presented the mean analyte values and not the dataset in its entirety or multiple average metrics. Cefas does not base regulatory assessment for the dredging and disposal of marine sediment on mean values alone. In this regard, I consider the evidence provided incomplete and inappropriately interpreted. Further, without knowing the sampling regime (i.e. number of samples and depths of repeat samples) and spread of the results, it is impossible to ascertain how representative the mean value is of the sediment in question.’</i></p>	<p>Sediment data are compared against a variety of quality guidelines including the Cefas Action Levels. As stated, given the lack of equivalent environmental effect standards within the UK, these have been included to provide additional context.</p> <p>Results reported at less than the LOD are used at the LOD value for statistical calculations such as mean.</p> <p>Following infill of the dock this will be isolated from the marine environment and as such will be reclaimed land. It has been confirmed with the MMO that once the temporary isolation structure is constructed in the northern water channel, the construction site will be reclaimed land and therefore not classified as a disposal site.</p> <p>Regarding the ‘face value’, results reported at less than the LOD are used at the LOD value for statistical calculations such as mean.</p> <p>Regarding the mean value for each analyte against both Cefas ALs, full results and analysis methods are presented within Appendix II of ES Appendix 13.1, Volume II.</p> <p>Further clarification on the dredge and disposal comments are provided in Table 1 in Appendix 13.1, ES Volume III. Further details on the dredge and disposal itself is provided in the Construction Management Plan (Appendix 4.1, ES Volume III)</p>
Cefas - Fisheries	<p>Cefas are content the applicant has correctly identified fish receptors and associated potential impacts for the project, and that suitable data and literature have been used to inform the assessment including site-specific surveys, and assumptions and limitations of this evidence have been acknowledged. Cefas support the proposed mitigation measures which include removal of fish prior to infilling of BMD and conducting all piling operations in the ‘dry’.</p> <p>Although as many fish as possible will be rescued, it is acknowledged that the Applicant does not guarantee that all fish will be caught and translocated during the process due to equipment limitations. Cefas support the approach that Methods will be agreed in advance with the relevant Statutory Nature Conservation Bodies (SNCBs).</p>	<p>Full details of the survey methods employed, and results are presented in Appendix I of ES Appendix 13.1, Volume III.</p> <p>Further information on the proposed fish rescue and removal methods are provided in the CMP (Appendix 4.1, ES Volume III)</p>

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CONSULTEE	COMMENTS	WHERE ADDRESSED
Cefas - Benthic Ecology	<p>The Cefas officer states:</p> <p><i>‘In addition to my comment below regarding the spatial extent of the habitat being lost, I would expect an assessment of the overall impact to present information regarding the ubiquity of both the species and habitats that are to be directly and/or indirectly impacted by the project. Uniqueness of such features should represent one aspect of the assessment procedure (e.g. where is the nearest blue mussel population to that within the Bramley-Moore Dock?, is the type of habitat found within the Bramley-Moore Dock unique to the Mersey Estuary?). This information is not currently presented, indeed there is a very minimal description of the benthic ecology species and habitats within the regions of direct and indirect impacts.</i></p> <p><i>I am unsure of the rationale behind the statement in Appendix 13.1 “low numbers of commercially importance shellfish species were noted, however these were not expected to be targeted within the dock area”, I must assume this refers to cockles and mussels, but I do not understand the notion of them not being targeted when the habitat within which they are located is to be lost as part of the project’s construction.’</i></p> <p>Further information requested in relation to:</p> <ul style="list-style-type: none"><li>■ Western water channel creation</li><li>■ Baseline assessment to include Nelson Dock water quality</li><li>■ Cefas is not in agreement with certain assessments of impact on benthic ecology</li><li>■ Queried why the shellfish species were considered 'not targeted' within the dock as a result of the works</li></ul> <p>Cefas also query <i>‘In Appendix 13.1, Section 2 it is stated “During this meeting aquatic ecology survey effort was discussed and agreed as appropriate in principal. MEAS made no comment in relation to aquatic ecology in their consultation response (dated 21st August 2019). Consultation response received from Natural England (dated 2nd September 2019) highlights the requirement to consider the marine environment /dock waters within ecological assessment, in particular potential impacts which may affect the River Mersey during the construction phase”. What is the outcome regarding this?; is there an agreement that further marine ecology survey work is considered necessary?’</i></p>	<p>Full details of the survey methods employed, and results are presented in Appendix I of ES Appendix 13.1, Volume III.</p> <p>Details of the western channel and potential for biodiversity enhancements within it are to be secured by condition.</p> <p>Blue mussels are afforded no specific nature conservation protection, as such the assessment of negligible impact is considered justified. Their importance as a commercial species is noted and the lack of commercial exploitation within BMD due to prohibited classification status is made clear within the Aquatic Ecology Chapter (Chapter 13, ES Volume II).</p> <p>The shellfish reference is in relation to mussels and cockles. Neither species are targeted commercially within BMD due to the area being of prohibited classification. Full details of the survey methods employed, and results are presented in Appendix I. Abundance of each species is provided.</p> <p>Mitigation measures in the form of biodiversity enhancements within the western channel are detailed within the Aquatic Ecology Chapter (Chapter 13, ES Volume II) and supporting technical report (Appendix 13.1, ES Volume III).</p> <p>Effects in relation to water quality, release of INNS and noise effects on receptors within the Mersey are considered within the Aquatic Ecology Chapter (Chapter 13, ES Volume II).</p>
Cefas - Shellfisheries	<p>Cefas are content the applicant has correctly identified the receptors and assessed the potential impacts on these. Cefas agree with the conclusions reached in the document that there will be no significant long-term changes to shellfish species.</p> <p>Cefas state there is no direct mention of shellfish species within some documents. Cefas have assumed for the purpose of this document that shellfish species are included within the tittle ‘fish fauna’ in document appendix 11.7. This should be clarified.</p>	<p>No specific updates to the ES required.</p> <p>Shellfish are included in the title ‘fish fauna’.</p>
Natural England	<p>Awaiting clarifications to comments on the planning application before providing formal response as covers same issues.</p>	<p>No specific updates to the ES required.</p>
United Utilities	<p>United Utilities state: <i>‘To ensure appropriate protection of infrastructure that crosses the site, a detailed method statement detailing the measures to protect our assets is likely to be requested. Our assets must not be impacted as development begins to come forward, both during and post construction. We must to be able to continue our statutory obligations to access and maintain our assets. There should be no additional load bearing capacity on any main without prior agreement from UU. This would include earth movement and the transport and position of construction equipment and vehicles. We will need to review any proposed designs (including any vibration or settlement calculations) and agree a method of work with you prior to any site works starting. Where our assets exist, the level of cover to the water mains and public sewers must not be compromised either during or after construction.</i></p> <p><i>It is the applicant's responsibility to demonstrate the exact relationship between any United Utilities' assets and the proposed programme of works associated with this application. Any site investigation or intrusive survey works that impact our assets must be agreed with us beforehand. No entries are to be made in to any of our chambers or pipelines without prior permission to do so. We’d strongly recommend that future applicants carry out the necessary investigations at their earliest convenience, ideally before any land transactions and certainly prior to any application to explore options for addressing this as early as possible.’</i></p>	<p>No specific updates to the ES required.</p>

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CONSULTEE	COMMENTS	WHERE ADDRESSED
Environment Agency -	<p>More information of the fish rescue including the removal method is requested.</p> <ul style="list-style-type: none"><li>■ The EA ask to ensure the applicant turns off the fish bubble curtain when laying membrane to give fish an opportunity to leave.</li><li>■ The EA requested a biosecurity plan and method statement to prevent the spread of non-native species</li><li>■ Advised new channel design details between the docks to include artificial habitat features to increase ecological complexities to make it easier for wildlife to colonise it (environmental net gain). Including this such as artificial cracks, crevices, reefs and or floating islands, all to go some way to mitigate for the loss of the dock.</li></ul> <p>The EA do have some concerns/requirements with regards to the sediment being left in situ and / piling being undertaken so some advice with regards to when this is covered by the Licence and the planning permission would be beneficial. The EA is working on the basis that once the dock is (for the most part) hydraulically isolated from the Mersey it falls within terrestrial planning, while the canal between the existing docks when reinstated will become under MMO jurisdiction once again. The EA’s concerns are with regards to;</p> <ul style="list-style-type: none"><li>■ Contaminated sediments remaining in situ and the risk to controlled waters</li><li>■ Proposals to pile</li><li>■ Detailed assessment of any contaminated deposits (from piles) on site, leading to remediation and verification</li></ul> <p>The EA also advise no works shall commence until a scheme to secure the following has been submitted and approved by the determining body:</p> <ul style="list-style-type: none"><li>■ De-watering of the site;</li><li>■ Protection of licenced and un-licenced sources of water;</li><li>■ Maintenance of any spring fed flows; and</li><li>■ Protection of groundwater dependant terrestrial ecosystems.</li></ul>	<p>Further information on the proposed fish rescue and removal methods are provided in the CMP (Appendix 4.1, ES Volume III)</p> <p>No membrane is now proposed as part of the construction methodology. A phase 1 fish removal shall take place prior to bed preparations within BMD. Once completed, bed raking will take place with the bubble curtain in place to allow vessel access to BMD. On completion, the bubble curtain shall be replaced with a silt curtain. This is considered important mitigation for the retention of resuspended sediments and possible mobilised INNS within BMD. It will therefore not be possible to allow fish species to leave during these works. A second stage fish rescue will be undertaken prior to the initial laying of aggregate.</p> <p>A Biodiversity Security Plan (BSP) incorporating a Biosecurity Risk assessment will be prepared. The pre-emptive preparation of a BSP will help flag up and address any key issues with the removal of species in this area which can support licence applications and be provided to consultees.</p> <p>Mitigation measures in the form of biodiversity enhancements within the western channel are detailed within the Aquatic Ecology Chapter (Chapter 13, ES Volume II) and supporting technical report (Appendix 13.1, ES Volume III) and the detail will be secured by condition. The biodiversity net gain report in Appendix 5 of ES Appendix 12.1, ES Volume III, assesses the implications of the scheme on biodiversity.</p> <p>Aggregate pumping (and associated vessel movements) will be the only activity taking place within the main river channel. As such we have assessed this and on the premise that aggregate pumping noise will not disrupt fish, no significant effect is anticipated in terms of disruption to migratory behaviour.</p>
Maritime and Coastguard Agency - Navigational Safety Branch	<p>The Navigation Safety Branch of the Maritime &amp; Coastguard Agency have reviewed the documents received in the consultation, and confirm they have no objections to a licence being granted. This is on the understanding that all maritime safety legislation is adhered to, and that the following risk mitigation measures take place:</p> <p><i>‘Conditions</i> <i>The Licence must ensure that HM Coastguard, in this case nmoccontroller@hmcg.gov.uk, The National Maritime Operations Centre is made aware of the works prior to commencement.</i></p> <p><i>Advisories</i></p> <ul style="list-style-type: none"><li>■ <i>The Consent Holder should ensure suitable bunding, storage facilities are employed to prevent the release of fuel oils, lubricating fluids associated with the plant and equipment into the marine environment.</i></li><li>■ <i>Any jack up barges / vessels utilised during the works/laying of the cable, when jacked up, should exhibit signals in accordance with the UK Standard Marking Schedule for Offshore Installations.</i></li><li>■ <i>The site is within port limits and the applicant should gain the approval/agreement of the responsible local navigation authority or the Harbour Authority/Commissioners/Council. They may wish to issue local warnings to alert those navigating in the vicinity to the presence of the works, as deemed necessary.’</i></li></ul>	<p>No specific updates to the ES required.</p>



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## 2.8 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:
  - Liverpool Bay/Bae Lerpwl Special Protection Areas (SPA) (Ref. UK9020294A);
  - Mersey Narrows & North Wirral Foreshore Ramsar Site (Ref. UK11041);
  - Mersey Narrows & North Wirral Foreshore SPA (Ref.UK9020287);
  - Mersey Narrows Site of Special Scientific Interest (SSSI) (Ref. 1056551);
  - Dee Estuary Special Area of Conservation (SAC);
  - Ribble and Alt Estuaries SPA and Ramsar site;
  - North Wirral Foreshore SSSI; and
  - Mersey Estuary Ramsar site
- Statutory and non-statutory designated built heritage assets in proximity to the application site, including but not limited to:
  - UNESCO World Heritage Site: Liverpool - Maritime Mercantile City (LMMC) (Ref. 1000104);
  - Listed Buildings:
    - Bramley-Moore Dock Retaining Walls, Grade II (Ref. 1072980);
    - Hydraulic Engine House at Bramley-Moore Dock, Grade II (Ref. 1072981);
    - Dock Wall from opposite Sandhills Lane to Collingwood Dock with Entrances, Grade II (Ref. 1072979); and
    - Nelson Dock Retaining Wall, Grade II (Ref. 1209519).
  - Stanley Dock Conservation Area.
- Residential properties and other uses sensitive to noise and air quality impacts in proximity to the application site and local road network, including:
  - Properties located along Regent Road, Fulton Street, A5054 Boundary Street, Derby Road, Walter Street, and those properties in Egremont on the Wirral bank of the River Mersey along roads stretching from approximately Caithness Drive to Wright Street; and Mariners Park Care Home;

- Residential properties and other uses, either directly adjacent or in very close proximity to the site, sensitive to daylight, sunlight, overshadowing and/or wind impacts;
- Residential properties and commercial uses associated with the Liverpool Waters permission (LPA ref: 100/2424; with the latest approved non-material amendment being 19NM/1121 – further non-material amendment reference 20NM/1801 pending determination), particularly those located in the adjacent Nelson Dock;
- Future users of the proposed new Regent Road/Blackstone Street hotel scheme (planning ref: 20F/0217);
- Any previously unrecorded archaeological assets that may be present in the ground beneath the application site;
- Geology beneath the application site likely to comprise Made Ground (Fill), overlying a sequence of natural geological strata of Tidal Flat Deposits over the Chester Pebble Beds Formation;
- Surface water features including:
  - The River Mersey;
  - The dock network, including adjacent Nelson Dock and Sandon Half-tide Dock; and
  - The Leeds & Liverpool Canal, which runs from north to south through Stanley Dock and beyond.
- The townscape character of the local urban environment;
- Locations in the local area with open views of the site, including specifically those views of the application site set out within the World Heritage Site SPD; 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 stadium and other proposed uses either as staff, football fans, event attendees, or visitors, once operational and other future adjacent residents, commercial occupants, construction workers and visitors.

## 2.9 FUTURE AGREED ASSUMPTIONS FOR LIVERPOOL WATERS

The approved scheme for the Liverpool Waters Northern Docks area includes development plots / blocks that straddle the redline boundary of the application site and Nelson Dock. Should the proposed development be consented, it is understood that the approved Liverpool Waters blocks would be delivered within the approved maximum parameters, but the detailed design revised to sit outside of the proposed development application red line boundary. As such, to ensure an appropriate assessment could be made of these future receptors, a working assumption has been agreed with Peel Holdings Land and Property (UK) Limited

(hereafter, Peel L&P) in regard to how these blocks would be broadly delivered.

The following elements of the consented Liverpool Waters scheme have been assumed for the purposes of the EIA to be delivered as follows (the location of the plots are detailed on Figure 2.1):

- Removal of proposed buildings immediately around and within Bramley Moore Dock (see Figure 2.1 – this includes plots E-15 to the north of BMD; E-14 to the east; E-11 and E-12 to the south; E-13 to the west; and E-17 in the centre of BMD).
- Removal of proposed buildings on the northern extent of Nelson Dock, including plots E-09 and E-10.
- The 31m tall section of plot E-04 (as detailed on Figure 2.2) on the north east corner of Nelson Dock would be removed, reducing the length of plot E-04 to the extent of the 28m tall section reflecting the redline of the application site for the stadium development.
- Plot E-06 on the western side of Nelson Dock to be reduced in length to reflect the redline of the application site for the stadium development.
- An offset from the redline may be required for the northern extent of plot E-06 on the west of Nelson Dock and the remaining section of plot E-04 on the east of Nelson Dock. The potential offset requirements would be determined based on the results of the EIA technical assessments and in discussion with Peel L&P, the blocks would be delivered within the maximum parameters but with a potentially reduced footprint through detailed design to respect the red line boundary.
- Plots E-07 and E-08 in the centre of Nelson Dock will be two storeys in height.
- The remaining buildings are as proposed in the approved Liverpool Waters scheme.

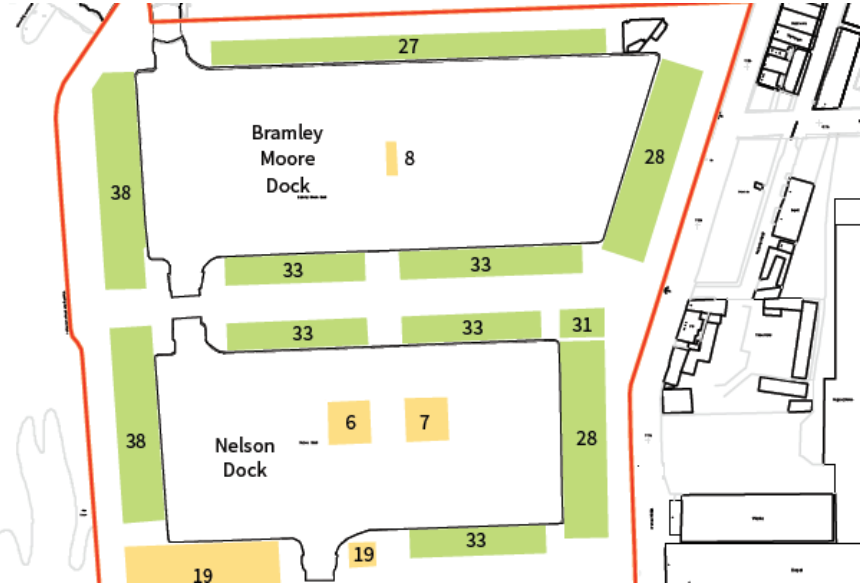
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Figure 2.1  
Extract from Liverpool Waters Development Plots Parameter Plan



Source: Planit-IE

Figure 2.2  
Extract from Liverpool Waters Parameter Plan showing Approved Blocks and their respective heights (m)



Source: Planit-IE

These working assumptions were provided to Peel L&P for discussion, comment and agreement in a Briefing Note (Appendix 2.3) at a meeting on 22<sup>nd</sup> August 2019.

2.10 ASSESSMENT SCENARIOS

2.10.1 Consideration of Liverpool Waters

Given the immediate proximity and scale of the Liverpool Waters scheme, it has been considered cumulatively throughout each of the technical chapters as described in Section 2.13 of this Chapter. In addition, whilst Liverpool Waters has an extant outline consent, reserved matters applications for the Northern Docks neighbourhood have not yet been submitted and approved and therefore, whilst Nelson Dock could be built out in advance of the proposed development, it could also follow the build-out of the approved phase 2036-41 on the parameters plan. This has necessitated the consideration of a number of assessment scenarios to ensure that the likely worse-case effects have been considered in each circumstance. The assessment scenarios considered within this ES are provided in Table 2.5 below.

Table 2.5  
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 and Liverpool Waters not coming forward in surrounding area</u>
Future Baseline - The Liverpool Waters Permission (the outline consent + non-material amendments)	Effect of Liverpool Waters on expected future baseline conditions at this time <u>assuming Liverpool Waters permission built out on-site and in surrounding area</u>
The 'Proposed Development' Scenario	Effect of the proposed development on baseline conditions at this time <u>assuming proposed stadium comes forward at site and no further elements of Liverpool Waters permission built out in surrounding area</u>
The 'Proposed Development + Liverpool Waters' Scenario	Effect of the proposed development & Liverpool Waters on expected baseline conditions at this time <u>assuming proposed stadium comes forward at site and Liverpool Waters permission is built-out in surrounding area (including re-provision of Liverpool Water proposals for application sites within the wider Liverpool Waters consented area)</u>

SCENARIO	CONSTRUCTION & OPERATIONAL PHASE ASSUMPTION
The 'Proposed Development + Liverpool Waters + Cumulatives' Scenario	Effect of proposed development & Liverpool Waters & cumulative schemes on expected baseline conditions at this time <u>assuming proposed stadium comes forward at site, Liverpool Waters permission is built-out in surrounding area (including re-provision of Liverpool Water proposals for application site within the wider Liverpool Waters consented area) and cumulative schemes come forward</u>

As set out in Table 2, different scenarios are proposed for consideration of cumulative effects with the Liverpool Waters scheme and the other identified wider cumulative schemes (these are set out at Section 2.15 of this Chapter).

The wider cumulative schemes include any standalone or 'drop-in' applications that are being brought forward or are proposed within the Liverpool Waters site area but are not part of the Liverpool Waters outline consent and the non-material amendments to this consent.

2.10.2 Consideration of Various Forms of Proposed Development Activity

Given the nature of the proposed development, its operation will vary significantly dependent on whether a football match or similar scale of event is being undertaken or not. As such, the following assessment scenarios have been considered throughout this ES to ensure the likely effects of the proposed development have been comprehensively considered:

- Match-day: Assuming the stadium is occupied at full capacity of 52,888 – match days are assumed to be between 28 times per year and may take place during the week typically starting at between 19:30 to 20:15 and would likely finish around 10PM or at weekends starting from 12:30 to 17:30 kick-off. Further details regarding the pre- and post-match periods are provided in Chapter 3 Application Site & Proposed Development;
- Non-Match Event: Assuming the stadium is occupied at full capacity of 52,888 – non-match events such as concerts or other sporting events are assumed to occur four times a year and to potentially take place at similar timings to football matches, with the flexibility for later start-times at weekends but not exceeding the 20:15 start-time of a weekday football match. Whilst there would be a curfew of 11pm for all major events (matches, concerts etc) egress from the site would inevitably go beyond that;
- Non-Match/Event Day: This is the typical operation of the proposed development on a non-match day or non-large occupancy event day. This does not preclude the operation of the following activities as part of the usual operation of the proposed development:
  - Meetings/Conferences- potential for up to 261 days per year;
  - Exhibitions/Conventions- potential for up to 339 days per year;

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- Weddings- potential for up to 79 days per year;
- Funerals- potential for up to 261 days per year;
- Banqueting- potential for up to 339 days per year;
- Christmas Parties- potential for up to 27 days per year; and
- Stadium Tours- potential for up to 339 days per year.
- The Hydraulic Engine House is intended to function as an exhibition / cultural space, the start/end point for the River Walk and part of the stadium tour.

These operational assessment scenarios have been considered as part of the various technical assessments, in addition to consideration of the demolition and construction phase, which is described in Chapter 4 Construction Strategy.

## 2.11 TEMPORAL SCOPE OF ASSESSMENT

As described further in Chapter 4: Construction Strategy, a 36-month construction phase programme is currently anticipated, with site preparation and enabling works proposed to commence in Q2 2021.

For the purposes of the ES, it has been assumed that the 'opening year' for the development will be Q4 2024.

## 2.12 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 as set out under Section 2.13 of this Chapter. However, the following details have informed the assessment of each these topics within the technical chapters.

### 2.12.1 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.

### 2.12.1.1 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](http://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.

### 2.12.2 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.

### 2.12.3 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. 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:

- Severe weather: storms;
- Tidal wave/storm surge;
- Floods;
- Transport accidents;
- Crowd disasters;
- Football related violence and disorder; and
- Urban fire.

## 2.13 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;



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- 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 (for example, as a result of the wind micro-climate assessment being based on the Lawson Comfort Criteria rather than a standard receptor sensitivity versus impact magnitude approach), this is clearly explained in the chapter.

### 2.13.1 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;
- the chapter updates for the revised 2020 submission;
- 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.

### 2.13.2 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
- any assumptions or limitations.

### 2.13.3 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.

### 2.13.4 Future Baseline Conditions

This section takes the form of a table as per the Baseline Conditions table previously described. However, it describes the 'future' baseline conditions of the application site in the event that the proposed development was not brought forward and instead the approved parameters for Bramley-Moore Dock under the Liverpool Waters consent (LPA ref: 10O/2424, latest NMA ref: 20NM/1801 submitted July 2020) were delivered. The technical consultants have referred to the Liverpool Waters' various ES documents to find the residual effect significance for relevant receptors and therefore, identify whether any receptors' sensitivity under this future baseline scenario would vary as a consequence of the build out of Liverpool Waters.

### 2.13.5 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.

### 2.13.6 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.

### 2.13.7 Assessment Pre-Mitigation

This section takes the form of two tables as two different scenarios are assessed, the Proposed Development Scenario and the Proposed Development + Liverpool Waters Scenario, each table 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.

### 2.13.8 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;

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- whether the post-mitigation effect is adverse or beneficial; and
- where further details can be found within the technical appendices.

### 2.13.9 Assessment Post-Mitigation

Again, this section takes the form of two tables as two different scenarios are assessed, the Proposed Development Scenario and the Proposed Development + Liverpool Waters Scenario, each table 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.

### 2.13.10 Inter-Development Cumulative Impacts

This section assesses the final scenario: The 'Proposed Development + Liverpool Waters + 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 over and above Liverpool Waters, 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.

### 2.13.11 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. For example, the consideration of Liverpool Waters is inherent within the non-match day traffic model used in the Transport Assessment, as such, it is not appropriate to separate this into two separate tables. 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.

## 2.14 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 and Institute of Ecology and Environmental Management (IEEM) 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 (e.g. the wind assessment, which differs due to it being based on the Lawson Comfort Criteria), the alternate approach is described in the relevant chapter.

### 2.14.1 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 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.

### 2.14.2 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.

### 2.14.3 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..

Table 2.6  
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
Small	Moderate Significance	Minor Significance	[2]	Negligible Significance	Negligible Significance



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MAGNITUDE OF EFFECT	SENSITIVITY OF RECEPTOR				
	Very High	High	Medium	Low	Negligible
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

2.15 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 21: Intra-Development Cumulative Effects.

Through consultation with LCC, 51 forthcoming schemes, as shown in Table 2., have been identified with potential for inter-development cumulative effects alongside the proposed development. In addition to these schemes, the proposed ‘Goodison Park Legacy Project’ (application reference 20O/0997), for the redevelopment of Goodison Park has also been considered as a cumulative scheme due to its link with the proposed development.

Table 2.7  
Cumulative Schemes Considered within ES

NAME / ADDRESS / PLANNING REF	SCHEME DESCRIPTION	STAGE
16F/1370 & 17F/2056 - “The Lexington”, William Jessop Way	35 storey residential block with 325 private rented sector (PRS) apartments	On site for completion September 2020
17F/1628 - "Quay Central", Plot C04 and "Park Central" C06, land to west of Waterloo Road, Central Docks	To erect 2 residential blocks of 237 PRS apartments with gym, parking and cycle spaces, office and ground floor commercial space	Recently completed construction Summer 2020
15L/2749 - Southern Warehouse, Stanley Dock, Regent Road	Conversion of warehouse to 256 bedroom apart-hotel, restaurants, assembly/leisure plus car parking.	On site for completion Summer 2020
15F/2438 - Conversion of former Tobacco Warehouse, Stanley Dock	Conversion to create 538 apartments; new 13th floor level of single storey penthouse apartments, public exhibition space, offices & basement car parking	On site for completion Autumn 2021
16F/2252 - “Fox Street Student Village”, Swainbanks Limited, 50 Fox Street	To convert Swainbanks building and redevelop remainder of site with 3 five to six-storey buildings to provide a total of 400 student bedrooms with gym, lounge, bistro and leisure facilities	Partly completed. Stalled. Completion date unknown.
17F/3525 - New Merseyside Police Headquarters, 30 Grosvenor Street	New 4 storey Police Headquarters and office development with associated 2 storey Annex building,	On site for completion Autumn 2021
16F/2755 - "Aura", Manfred Street/Erskine Street	To erect a 14 storey building with 1,007 student bedrooms.	On site for completion Winter 2020
13F/1599 - Royal Liverpool University Hospital, Prescot Street	Redevelopment to provide a hospital and related healthcare facilities comprising core hospital buildings, energy centre, future healthcare buildings	On site for completion February 2021
14F/0874 - “One Islington Plaza”, Devon Street/Moss Street	To erect 8/10 storey block containing 317 student beds with ground floor commercial floorspace.	On site due for completion September 2019
17F/1037 - “Devon House”, 33 Devon Street	New part eight, part ten storey building with ground floor retail and 208 studio apartments	On site for completion September 2020
18F/0347 - “Fabric Village”, Gildart Street/	Three residential blocks between 7 and 10 storeys high comprising 419 residential	On site for completion Summer 2021

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NAME / ADDRESS / PLANNING REF	SCHEME DESCRIPTION	STAGE
Devon Street	apartments with ground floor retail.	
19F/0294 - “Natex”, Land at Norton Street/ Islington (former National Coach Station)	620 beds of student accommodation in two blocks of 10 and 16 storeys, including erection of cycle and bin store with ground floor commercial units.	On site for completion for September 2020
13F/2947 - “The Paramount”, Pudsey Street/28 London Road	488 bedroom student accommodation in 7 to 11 storey building	On site due for completion September 2019
16F/1539 - “Horizon Heights”, Land bounded by Skelthorne Street, Bolton Street, Hilbre Street	Mixed use development comprising 2 blocks for ground floor commercial uses with 1,085 student bedrooms on upper floors	On site due for completion September 2019
18F/1410 - LJMU Campus, Copperas Hill/ Brownlow Hill	To erect 5 storey Student Life building and 2 storey sports building with retail and cafe uses	On site for completion September 2020
18F/2751 - Renshaw Hall, Benson Street	Redevelop with 404 student bedrooms in n 11 storey block and erection of a 12 storey hotel.	On site for completion December 2020
17F/1982 - “One Wolstenholme Square”, 5 Parr Street & Wolstenholme Square	Four blocks of 7 - 10 storeys for commercial units and 364 studio apartments and 68 one bed apartments on upper floors.	Recently completed construction Summer 2020
18F/0301 - “The Address at One Wolstenholme Square”, 18-24 Seel Street	11 storey block with 200 apartments, spa, pool, and ground floor commercial space.	Recently completed construction Summer 2020
18F/3231 - Isle of Man Ferry Terminal West Waterloo Dock	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.	Approved 09 April 2019
16F/1826 - “Strand House”, 21 Strand Street	New 16 storey mixed use development comprising 383 apartments with residents’ gym, cinema, roof terrace, and two ground floor commercial units	On site for completion October 2020
16PO/0741 - Silkhouse	Conversion from office tower to create 193	Recently completed

NAME / ADDRESS / PLANNING REF	SCHEME DESCRIPTION	STAGE
Court, Tithebarn Street	self-contained flats	construction Summer 2020
17F/0340 & 19F/1611 - “Infinity”, Leeds Street/Pall Mall	Three towers of 39, 33 and 27 floors to include 1,032 apartments	On site for completion Autumn 2022
100/2424 - “Liverpool Waters” As amended under the following NMAs: 20NM/1801 (pending determination); 19NM/1121; and 18NM/2766.	Comprehensive redevelopment of up to 60ha of former dock land comprising a max. of 314,500sqm office space, 733,200sqm residential space accommodating 9,000 homes, 53,000sqm of hotel and conference facilities, 19,100 sqm comparison retailing, 7,800sqm convenience retailing, 8,600sqm financial and professional services, 27,100sqm cafes and restaurants, 19,200sqm drinking establishments, 8,900sqm of non-residential institutions, 33,300sqm assembly and leisure, and public open spaces.	Outline permission granted June 2013.
18RM/1554 & 19RM/1817- “William Jessop House”, William Jessop Way, Princes Dock	To erect 6 storey office building with ground floor commercial retail	Permission granted August 2019
170/3230 and 19RM/1037 - Liverpool Cruise Liner Terminal, Princes Dock	New cruise liner terminal and a vehicular link span bridge and pedestrian bridge/ walkways	Permission granted September 2019. Completion April 2021 anticipated.
18F/3247 - Plot C02, Liverpool Waters	To erect residential development comprising 538 apartments with ground floor commercial space, in four blocks of 10 storeys in height, with parking, soft and hard landscaping/ public open space, including a floating timber jetty and dockside walkway.	Application submitted December 2018
19F/1290 - Site bounded by Waterloo Road/ Paisley Street/ Roberts Street/ Greenock Street	To demolish existing building and erect 17-storey building comprising 140 residential units with associated mezzanine, residents lounge and gym, basement car park, and ground/mezz floor	Application submitted May 2019

NAME / ADDRESS / PLANNING REF	SCHEME DESCRIPTION	STAGE
	commercial unit.	
18F/0216 - “The Metalworks”, Vauxhall Road	Two linked 13/15 storey blocks with 319 apartments, ground floor commercial space, car parking for 66 spaces.	Application awaiting signing of legal agreement since August 2018
17F/0874 - 9-27 Freemasons Row	11 to 15 storey blocks with 656 PRS apartments above ground floor commercial space.	Permission granted April 2019
18F/1035 - “Naylor Street — Phase 1”, St Bartholomew Road/Paul Street/ Naylor Street	To erect 3 buildings from 6 to 11 storeys containing 240 residential apartments in a mix of studios, 1 and 2 bedrooms, car parking and lower ground/ground floor mixed commercial uses	Permission granted November 2019
13RM/2633 - Land between Blackstock Street & Paul Street	New building of between five and eight storeys comprising 200 flats, together with associated parking and landscaping	Permission granted February 2014. Technically has started, but no progress in 3 years.
16F/3078 - “The Tannery”, Bevington Bush/Gardners Row/ Edgar Street	To erect three blocks containing 381 residential units and ground floor commercial unit.	Permission granted November 2017
17F/1911 - “Bevington House”, Bevington Bush/ Aldersey Street	To erect three 9-17 storey blocks containing 614 apartments with ground floor communal space, gym, commercial unit	Permission granted November 2018
18F/0417 - Land bounded by Whittle Street/Smith Street/ Kirkdale Road	Demolish existing building and erect mixed use part 6/part 5 storey building of 177 residential apartments, commercial space, residents gym, lounge and parking.	Awaiting signing of legal agreement since August 2018
16F/2797 - "Rose Place", Virgil Street/Great Homer Street	To demolish existing building, erect a 9 storey apartment blocks containing 277 residential units (C3 Use), ground floor communal space with associated access, servicing, car parking and landscaping.	Permission granted July 2017
16F/0823 - Citipads, Land at Fox Street/St Anne Street	To demolish existing buildings and erect 3 residential blocks ranging from 5 to 8 storeys to accommodate 313 flats with associated parking and landscaping (amended plans).	Permission granted September 2016

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NAME / ADDRESS / PLANNING REF	SCHEME DESCRIPTION	STAGE
19F/0454 - "Copperas House", Copperas Hill Police Station	To demolish former police station and erect part 8/part 9 storey block for student accommodation comprising 34 clusters of 280 bedrooms	Permission granted November 2019
14F/1313, 17F/0103, 17F/2135 and 17F/3094 - "Baltic Square", Park Lane, Beckwith Street, Carpenters Row and Cornhill (former Heaps Rice Mill)	Conversion of former mill into 138 apartments; to redevelop adjacent land with three blocks, 10, 11 and 14 storeys with 194 PRS apartments and 200 serviced apartments, together with commercial floorspace.	Permission granted December 2017
14F/1305, 17F/0107 and 17F/2768 - "One Park Lane", Land bounded by Park Lane, Pownall Street, Liver Street and Beckwith Street	Two new 10 to 16 storey buildings with 266 apartments; four commercial units.	Permission granted January 2018
16F/2634 - 30-36 Pall Mall	Part 10/part 22 storey tower of 336 apartments & ground floor commercial units	Permission granted July 2017
19F/1789 - Pall Mall Exchange Phase 1	Hybrid application, including the demolition of disused building adjacent to Pall Mall, for development comprising: <ul style="list-style-type: none"> <li>- Full application for the erection of an eight-storey office building with ground floor commercial uses; public open space; and,</li> <li>- Outline application for new hotel and two office buildings also with commercial uses at ground floor; basement parking and public open space.</li> </ul>	Permission granted November 2019
—OUT/09/06509 (Wirral MBC) Wirral Waters	Demolition of existing buildings and the creation of a new city neighbourhood at East Float, including a series of new urban quarters (Northbank West, Marina View & Four Bridges, Vittoria Studios and SkyCity & The Point), consisting of a maximum of 13,521 residential units (Class C3 Use), a maximum of 422,757sq m office and	Permission granted May 2012

NAME / ADDRESS / PLANNING REF	SCHEME DESCRIPTION	STAGE
	research and development floorspace (Class B1), a maximum of 60,000sq m retail uses (Classes A1-A5), a maximum of 38,000sq m hotel and conference facilities (Class C1) a maximum of 100,000 sq m of culture, education, leisure, community and amenity floorspace (Classes D1 and D2), together with the provision of car and cycle parking, structural landscaping, formation of public spaces and associated infrastructure and public realm works and including retention of and conversion works to Grade II Listed Hydraulic Tower. Within this overall maxima permission is now sought for flexible use under the GPDO Part 3 Class E for 48,500 sq m of floorspace (reduced from 485,000 sq m) to be used for office and research and development floorspace (Class B1), retail uses (Class A1 retail, Class A2 Financial & Professional Services, Class A3 restaurants and cafes, Class A4 bars and Class A5 hot food takeaways), hotel and conference facilities (Class C1), culture, education, leisure, community and amenity floorspace (Classes D1 and D2). The application remains submitted in outline with all detailed matters reserved for subsequent approval. (amended description).	
Awaited - 70-90 Pall Mall	Mixed-use development, including a new "luxury" hotel alongside residential accommodation - a total of 812 homes	New application awaited following collapse of previous development
Awaited - "The Northern Quarter", Leeds Street/Vauxhall Road/Pumpfields Road	Redevelopment with 5 blocks from 4 to 12 storeys containing 914 flats with ground floor commercial space	Application submitted March 2016 but scheme is understood to be being redesigned and a new application of similar scale to be submitted in its place
Awaited - "Ten Streets"	Comprehensive redevelopment with mixed	Strategic Regeneration

NAME / ADDRESS / PLANNING REF	SCHEME DESCRIPTION	STAGE
	uses including digital and creative industries as part of a Cultural Enterprise Hub, residential, hotels and leisure (9.84ha)	Framework Supplementary Planning Document was adopted by LCC in February 2018. Applications anticipated
Awaited - Mount Pleasant car park site	Potential mixed use development incorporating educational uses, leisure, public exhibition space, offices, digital and creative industries, medical research institutions, hotels, residential and student accommodation (1.2ha)	Site and £150m+ opportunity currently being marketed. Planning application awaited
Awaited - Former ABC Cinema, Lime Street	Conversion to 1,500 seat venue and TV studio	Planning application awaited
Awaited - "Ovatus 2", Leeds Street/ Back Old Hall St	New 48 storey residential tower with 530 apartments	Application anticipated
17F/0913 Vacant Land William Jessop Way Liverpool L3 1QW	Full application 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.	Recently completed construction Summer 2020
20F/1203 - Vacant Land, Plot A06 William Jessop Way Princes Dock Liverpool L3 1QP	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	Application submitted May 2020 - Pending determination
19F/1038 — Plot 11, Land Off Princes Road Princes Dock Liverpool	To erect 10 storey hotel (C1) including lobby, bar, cafe, restaurant, business suite at ground floor level, plant enclosure at roof level, visitor and coach parking, taxi pick-up and drop off point, hard and soft landscaping.	Permission granted November 2019
20F/0217 — Land bounded by Blackstone Street, Fulton Street and Regent Road Liverpool 5	Demolition and re-development of site to provide 9 storey hotel with 9 storey multi-storey car park with associated access and servicing.	Application submitted January 2020. Pending determination
20F/1947 — Lightbody Street	Application to erect 210 residential units with 716 sq m flexible commercial use and	Application submitted August 2020 —



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NAME / ADDRESS / PLANNING REF	SCHEME DESCRIPTION	STAGE
	two substations at land where Lightbody Street meets Great Howard Street	Pending determination
200/0997 – Goodison Park Legacy Project, Goodison Park	To demolish existing buildings and redevelop the site for a mix of uses, comprising residential units (Use Class C3); residential institution (Use Class C2); shops (Use Class A1); financial & professional services (Use Class A2); food and drink use (Use Class A3); drinking establishments (Use Class A4); hot food takeaways (Use Class A5); business use (Use Class B1); non-residential institutions (Use Class D1); and open space, with associated access, servicing, parking and landscaping. (Outline application with all matters (Access, Appearance, Landscaping, Layout and Scale) reserved)	Application submitted April 2020 – Pending determination

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.

## 2.16 APPROACH TO THE 2020 ES REVISIONS

As discussed in Section 2.7, in response to planning and marine licence application consultation comments and post-submission 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 2.8.

Table 2.8  
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"><li>■ Proposed development scheme design changes are of no relevance to assessment;</li><li>■ There has been no relevant updates to legislation/policy etc. since previous submission;</li><li>■ There have been no changes to baseline data and new cumulative schemes will not have cumulative interactions with proposed development;</li><li>■ 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.</li></ul>
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’ 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 predating 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 2.9 sets out the structure of the revised ES and the key amends made to each volume/chapter.

Table 2.9  
Amendments Made to the ES Chapters

ES CHAPTER	DETAILS OF REQUIRED AMENDMENTS
Volume I	
NTS	The Non-Technical Summary was revised to take account of the technical assessment updates.
Volume II; ES Main Volume	
Chapter 1 Introduction	Additional text was 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 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.
Chapter 3 Application Site & Proposed Development	Amended to set out any notable changes to the application site baseline, and also clearly stating the proposed development design changes and how they have the potential to affect assessments.
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 specifically to address the rationale behind the design changes.
Chapter 6 Planning Policy Context	Reviewed to account for any updates to planning policy since the initial planning submission.
Chapter 7 to 20 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 21 Intra-Development Cumulative Effects	Revised to account for any changes in effects reported in the technical assessments.
Chapter 22 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.

## 2.17 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

# EIA METHODOLOGY

methodology section of the relevant technical chapter(s) and the relevant technical appendices.

## 2.18 WORKS CITED

[1] HM Government, “The Town and Country Planning (Environmental Impact Assessment) Regulations 2011,” HMSO, London, 2011.

[2] HM Government, “The Town and Country Planning (Development Management Procedure) (England) Order 2015,” London, 2015. [Online].

[3] HM Government, “The Town and Country Planning (Environmental Impact Assessment) (Amendment) Regulations,” HMSO, London, 2015.

[4] Institute of Environmental Management and Assessment, “Special Report – The State of Environmental Impact Assessment Practice in the UK,” IEMA, 2011.