

2. Approach to EIA

Introduction

- 2.1 This Chapter sets out the approach and methodology that has been undertaken to complete the assessment of the likely significant environmental effects.
- 2.2 This Chapter sets out the following:
- Adoption and application of best practice within the EIA process;
 - Consultation, including the stakeholder and public engagement, summarising the level of engagement with statutory and non-statutory consultees, public consultation events and other forms of engagement;
 - Scope of the ES, including the technical topics scoped in and out of the ES;
 - Approach to the assessment of likely significant effects, specifically covering: the definition of the Project for Assessment; the full extent of development and consideration of the baseline environment; consideration of the future receptors; information to inform the assessment in the ES; assessment scenarios; implementation of mitigation and monitoring; criteria for determining the level of effects and significance; reporting effects and mitigation or the Proposed Scheme, separately from the Project for Assessment; EIA requirements at later stages; co-ordination with Habitat Regulations Assessment; co-ordination with the Water Framework Directive Assessment; and limitations/assumptions; and
 - Interface of the EIA Process with Other Consenting Regimes (Habitats Regulation Assessment¹ and the Water Framework Directive Assessment²).

Adoption of Best Practice

- 2.3 As confirmed within **Chapter 1: Introduction**, this ES meets the requirements set out in Regulation 18, Paragraphs 3 – 4 and Schedule 4 of the EIA Regulations.
- 2.4 In addition, the EIA (and therefore the ES) has been undertaken with due consideration of the following guidance documents:
- Ministry of Housing, Communities and Local Government, National Planning Practice Guidance (PPG) [Online]³; and
 - IEMA, Implementing the Mitigation Hierarchy from Concept to Construction – August 2024⁴.

Consultation

- 2.5 The following sections of this Chapter set out the consultation and engagement process that has been undertaken with stakeholders, consultees and the public, including through the EIA Scoping process.

Stakeholder and Public Engagement

- 2.6 The Project Team have undertaken technical consultation with relevant consultees to inform the scope, assessment methodology/approach and in some instances the outputs of baseline studies/surveys. The specifics of technical consultation are reported within **Technical Chapters 7 – 18**.
- 2.7 In addition, consultation with the public was undertaken during a 4 week consultation period from 20th January 2025 and included two public exhibitions held in Rochdale and Bury on the 29th January and 4th February 2025 respectively. In total circa 130 visitors attended the public exhibitions and 71 questionnaires, 13 enquiry forms and 5 detailed emails were received. Details of the public consultation events are provided in the **Consultation Statement**.
- 2.8 The environmental related comments raised, and where these are considered within the ES, are summarised in **Table 2.1**.

Table 2.1: Summary of Environment-Related Public Feedback

Topic	General Comment(s)	Relevant Technical Chapter(s)
Jobs, skills and employment	- Many respondents welcomed the job creation potential but had concerns about the quality of roles being offered. - Concerns that employment would be largely in warehousing and logistics, providing low-paid, low-skilled work. - Stronger focus on high-quality jobs in advanced manufacturing and technology is needed. - Some respondents suggested there be training and apprentice opportunities for all ages. - Request for the employment opportunities to be for local people. - Concerns that the scale of the development would place additional strain on local services, including healthcare and schools.	The types and number of employment opportunities and access to work and training during both the construction and operational stages are assessed in Chapter 7: Socio-economics and Human Health. Potential significant effects on healthcare and schools have been scoped out of the ES. The reasons for this are set out in Chapter 6 of EIA Scoping Report (Appendix 2.1).
Transport, road capacity and access	- Improved transport links were a key priority for many respondents. - Support for better bus and tram connections, with some calls for a new	Impacts of traffic from the Project for Assessment are assessed in Chapter 8: Transport and Access.

Topic	General Comment(s)	Relevant Technical Chapter(s)
	Metrolink stop both in Heywood and at the site. • Desire to see the return of the 167-bus service to Manchester, in addition to suggestions for a bus route to the site. • Need for safer walking and cycling routes, particularly for commuting. • Road infrastructure would not cope with the increase in traffic, particularly around major routes such as the M62/M60/M66 junctions. • Concerns raised about increased traffic and congestion, particularly on already busy roads.	Secondary mitigation in the form of active travel measures and public transport are also considered in Chapter 8: Transport and Access.
Landscape, recreation and green space	• There were a number of comments about ensuring green spaces are incorporated into the development. • Some respondents raised concerns about the buildings impacting local views. • Suggestions included dedicated green recreation space, and the preservation of existing trees. • There was strong opposition to building on greenfield sites, with some arguing that brownfield regeneration should be prioritized instead.	Impacts associated with the proposed heights of the Plots are considered in Chapter 17: Landscape and Visual. The areas of retained landscape / green space is shown on EIA Assessment Plans Figure 4.1 and 4.3 and Parameter Plans Figure 5.1 and 5.3.
Noise and Air Pollution.	• Noise and air pollution (including odour) were also highlighted as potential issues, with some questioning whether enough mitigation measures were in place. • Air quality was a key issue, particularly with increased HGV traffic expected from the development. • Some respondents felt this could worsen pollution levels in surrounding areas, including Heywood, Pilsworth, and Middleton.	Noise and air quality are considered in Chapter 9: Noise and Vibration and Chapter 10: Air Quality. Effects on odour are scoped out of the ES. The reasons for this are set out in Appendix 10.3.
Biodiversity	• Many respondents raised concerns about the significant loss of greenbelt and agricultural land, highlighting the impact on local wildlife, biodiversity, and natural drainage systems.	Impacts on biodiversity are considered in Chapter 11: Biodiversity. Impacts on the natural drainage system are considered in Chapter 12:

Topic	General Comment(s)	Relevant Technical Chapter(s)
		Hydrology, Flood Risk and Water Quality.
Water Resources	Concerns about the impact on local infrastructure, including roads, utilities, and public services, with fears that the development could strain resources rather than enhance them.	Impacts on potable and foul water are considered in Chapter 12: Hydrology, Flood Risk and Water Quality.

EIA Scoping

- 2.9 A request for EIA Scoping Opinion(s), together with a single EIA Scoping Report (**Appendix 2.1**), prepared in line with Regulation 15, of the EIA Regulations was submitted to both Councils on 17th October 2024. A Scoping Opinion has not been received to date; however a number of consultation responses have been received and are provided in **Appendix 2.2**. **Appendix 2.3** summarises the key comments received and how these have been addressed within the ES.
- 2.10 Where further information or clarification was requested as part of the consultation responses to the EIA Scoping Report, or where additional consultation with stakeholders has been undertaken, a summary of the key consultations is provided in **Table 2.2** and detailed in **Technical Chapters 7 – 18**.

Table 2.2: Summary of Stakeholder Engagement

Stakeholder	Summary of Consultations	Relevant Technical Chapter(s)
The Councils	- Development Meeting 1 (14th August 2024); - Development Meeting 2 (10th October 2024); - Development Meeting 3 (6th November 2024); - Development Meeting 4 (4th December 2024); and - Development Meeting 5 (15th January 2025).	Briefings and discussions on the strategy for the EIA, the content and scope of the EIA and ES were undertaken during each of these meeting. This included the boundaries, terminology and structure adopted through this ES, particularly in relation to how the Proposed Scheme and Project for Assessment would be comprehensively assessed but also reported separately, clearly. A high-level overview of the EIA Scoping Report (Appendix 2.1) and its conclusions was provided as part of Development Meeting 2. This was supported by a Technical Note setting out the key conclusions of the EIA Scoping Report (Appendix 2.1).

Stakeholder	Summary of Consultations	Relevant Technical Chapter(s)
		The co-ordinated approach to the Scoping process was agreed. High-level feedback was provided by the Councils on the EIA Scoping Report (Appendix 2.1). This was discussed and it was concluded that there was no requirement to adjust the topic breadth proposed for the ES. Particular details from consultee responses discussed. These are discussed at a high-level below or in detail in Appendix 2.3.
	Ground investigation reports and a remediation strategy (if required following ground investigation and assessment) will be required, secured through planning conditions. Request potential risk of mining and ground collapse be carried forward to the ES.	Assessment of mining and ground collapse and details of the ground investigations are provided in Chapter 13: Ground Conditions and Contamination. The ground investigations for the Proposed Scheme will be secured through planning condition.
	Requested air quality monitoring is undertaken. Odour and dust effects likely to be managed through mitigation.	Details of the air quality monitoring are provided in Appendix 10.1. A construction dust assessment is provided in Appendix 10.2 and an odour assessment is provided in Appendix 10.3.
	Discussions regarding assessment methodology, confirmation of effects and historic assets to be assessed.	Details of receptors and effects are provided in Chapter 16: Built Heritage.
	Agreement to viewpoints and methodology and agreement of Accurate Visual Representation (AVR) locations.	Details of the agreed viewpoint locations are provided in Chapter 17: Landscape and visual. Location of the viewpoints are provided shown on Figure 17.5 and AVR locations in Appendix 17.4 and 17.5.
	Key considerations for the Climate Change assessment including how the assessment will scope out climate resilience, how greenhouse gas (GHG) emissions will be considered assessing a worst case scenario, including the implications of peatland disturbance.	Mitigation for water use and efficiency is detailed in Chapters 4 and 5 and Chapter 12: Hydrology, Flood Risk and Water Quality. Implications of peatland disturbance are scoped out of the ES. The reasons for this are

Stakeholder	Summary of Consultations	Relevant Technical Chapter(s)
	Water use and efficiency noted as part of the discussions.	provided in the EIA Briefing Note: Peat(Appendix 2.4) and Chapter 18: Climate Change .
Environment Agency	Effects of contamination to controlled waters.	Potential for contamination has been dealt with through a Phase 1 (Appendix 13.1) and subsequent remedial actions as detailed in Chapter 13: Ground Conditions and Contamination .
	A request was made to consider layout and development type in proximity to the Pilsworth Quarry Landfill to ensure a sufficient buffer is in place to reduce risk of nuisance / impacts to receptors / occupants of the intended proposed development coming forward.	An Odour Assessment (Appendix 10.3) has been prepared to support the Application and confirms that there are no issues as a result of operations from the Pilsworth Landfill.
	Request for a Riverine Metric Assessment as part of BNG assessment. Discussions held with the Environmental Agency (EA) regarding the content of the Water Framework Directive (WFD). The EA recommend that potential groundwater impacts are screened in to the WFD assessments, water quality monitoring is implemented, appropriate survey work is undertaken to establish the ecological value of tributaries and enhancements are included that go above and beyond preventing deterioration. The EA have undertaken a pre-planning review of the WFD and its content has been agreed. It has been agreed with the EA that a WFD Screening Assessment is sufficient for submission with the outline Application. Further assessment (and potentially additional surveys) will be required at the Reserved Matters stage, when necessary detail is available. This has also been agreed with the EA.	Requirement for a River MoRPH assessment are only required if there are impacts within 10m of the bank top. The EIA Assessment plan (Figure 4.1) show a buffer of ~50m. This is possibly with the exception of river crossings. A WFD Screening Assessment has been submitted with the Application. EA comments have been addressed within the WFD Screening Assessment and are reflected in Chapter 12: Hydrology, Flood Risk and Water Quality .
	The EA have been provided with a copy of the flood model. The methodology and model has been subject to several	The modelling has informed the baseline flood risk within the Assessment Boundary. Details are

Stakeholder	Summary of Consultations	Relevant Technical Chapter(s)
	rounds of comments from the EA which have been addressed within the Flood Risk Assessment.	provided in the Flood Risk Assessment and Chapter 12: Hydrology, Flood Risk and Water Quality .
Historic England	Consulted in relation to proposed methodology for archaeological trial trenching works at Meadowcroft Fold. The methodology was agreed, and monitoring of the fieldwork was deferred to GMAAS with an offer of specialist advice if required.	Details of archaeological works are provided in Chapter 15: Archaeology and within the Desk Based Assessment (Appendix 15.1).
	Discussions regarding assessment methodology, confirmation of effects and historic assets to be assessed.	Details of receptors and effects are provided in Chapter 16: Built Heritage .
National Highways	Consulted specifically in relation to the synergies between the Transport Assessment and the EIA. The approach to EIA and the assessment of traffic was presented to them at the meeting of 6 th August 2024, which included the provision of a technical note as material provided in advance of the meeting.	The approach as set out is as adopted in Chapter 8: Transport and Access ; Chapter 9: Noise and Vibration ; Chapter 10: Air Quality and Chapter 18: Climate Change .
Natural England	Approach and scope for designated sites and Habitat Regulations Assessment (HRA). Specific comments in relation to the consideration of air quality impacts on Holcroft Moss, within the Manchester Mosses Special Area of Conservation (SAC).	A shadow HRA has been undertaken and submitted with the Application. Synergies with the HRA and EIA are detailed within Chapter 2: Approach to EIA . Effects of air quality on the SAC are detailed in Chapter 10: Air Quality .
	Details to be included on how adverse impacts on soils and Best and Most Versatile (BMV) agricultural land can be avoided or minimised.	Assessment of BMV is provided in Chapter 14: Agriculture and Soils .
	Natural England noted that the ES should identify how development affects the ability of the natural environment to adapt to climate change; alongside how the development impacts the environment's ability to store and sequester carbon.	Mitigation has been set out within Chapter 4: Development Specification – Project for Assessment and Chapter 5: Development Specification – Proposed Scheme outlining commitment to achieve a Biodiversity Net Gain. This includes the consideration of guidance such

Stakeholder	Summary of Consultations	Relevant Technical Chapter(s)
		as the Natural England Climate Change Adaptation Manual. Assessment of greenhouse gases are provided in Chapter 18: Climate Change .
	Surveys to establish the extent of peat within JPA 1.1.	A review of existing ground investigations has been undertaken which has concluded peat is limited to 'pockets' of peat and effects of peat loss are not considered significant. Details are provided within Appendix 2.4 .
Coal Authority (name changed to Mining Remediation Authority (MRA) on 28 th November 2024)	Teams meeting held on 19 th July 2024, 3 rd October 2024. The MRA confirmed their general position regarding mineshafts which is to avoid building over them wherever possible (in accordance with their Position Statement). It was concluded that if a strong justification to maintain flexibility to build over mine entries was put forward as part of the planning application, then the MRA would be relatively comfortable as long as this was supported by a robust strategy to mitigate the risks. MRA will expect the outline application to be subject to a planning condition requiring a detailed ground investigation to address unknown coal mining risks so that mitigation can be designed accordingly.	The build over strategy has been provided as part of the Planning Statement . Details of the ground investigations to address unknown coal mining risks so that mitigation can be designed accordingly are provided in Chapter 13: Ground Conditions and Contamination . The ground conditions will be secured through planning condition.

- 2.11 The scope of Cumulative Projects is set out in **Chapter 19: Assessment of Cumulative Effects**. Since the submission of the EIA Scoping Report, there have been a number of changes. One cumulative project¹ which was being monitored has been removed as no planning application has been submitted and therefore there is insufficient information to inform an assessment.
- 2.12 Two additional cumulative projects² has been added due to submission of planning applications for these projects following submission of the EIA Scoping Report. The full

¹ Land To The West Of Bamford And South Of Norden, Rochdale, planning application reference: 21/01531/SCO.

² (Cumulative Project 14) Plot 4A, Heywood Distribution Park and (Cumulative Project 15) Trub Farm.

list of Cumulative Projects can be found in **Chapter 19: Assessment of Cumulative Effects**.

- 2.13 In the absence of a Scoping Opinion from the Councils, the Cumulative Projects have not been confirmed by the Councils, however, the Cumulative Projects identified are considered to be appropriate.

Updates since EIA Scoping

Evolution of the Assessment Boundary / Project for Assessment

- 2.14 Since the preparation of the EIA Scoping Report, there have been changes to the spatial referencing, assessment boundaries, retainment of Non Designated Heritage Assets (NDHAs) and assumed heights. The changes include:
- **Spatial Referencing:** The EIA Scoping Report (**Appendix 2.1**) detailed terminology and a supporting Spatial Referencing Plan (Figure 4.1 of **Appendix 2.1**) in order to apportion elements of the Project for Assessment into distinct areas, and aid the identification of location-specific impacts, design and mitigation strategies. The spatial referencing has changed to align with the Application Boundary and assumed layout for the Project for Assessment, which is now understood better. The referencing now refers to 'Plots' and these are shown on **Figures 4.1, 4.2, 5.1 and 5.2** and described in **Chapter 4: Development Specification – Project for Assessment** and **Chapter 5: Development Specification – The Proposed Scheme**.
 - **Changes to Assessment Boundary and Application Boundary:** There has been a reduction to the Application Boundary, a reduction to the Assessment Boundary and a minor extension to the Assessment Boundary. The changes are:
 - *Reduction to the Application Boundary:* A small parcel of land adjacent to Pilsworth Fisheries associated with a planning application for a café is excluded from the Application Boundary. This parcel of land remains within the Assessment Boundary. The planning application is considered as a Cumulative Project (further information is provided in **Chapter 19: Assessment of Cumulative Effects**);
 - *Reduction to Assessment Boundary:* Exclusion of the proposed Simister Island works (including the associated attenuation to the north), as this is a functionally independent, stand-alone project which is being advanced by National Highways. Its primary purpose is to address existing shortcomings and create capacity for the wider Strategic Road Network. It is considered as a Cumulative Project (further information is provided below under 'Definition of the Project for Assessment' and in **Chapter 19: Assessment of Cumulative Effects**);
 - *Extension of Assessment Boundary:* There is a very minor increase in the Assessment Boundary to include Whittle Lane to the south of the M62 and the minor increase is within the highways controlled land; and

- *Changes to retention of Non Designated Heritage Assets (NDHAs):* Three additional NDHAs are assumed to be retained which are Coal Pits Farm, Stock Nook³ and New Gap Farm.
- **Heights:** The heights across the Assessment Boundary to the north of the M62 were assumed to be a maximum height of 65m above ground level (AGL) across the Project for Assessment. The maximum height for the Project for Assessment (**Figure 5.2**) have increased by 4m to 69m. However, an increase in height occurs across one Plot only (Application Plot D). The maximum heights across all other Plots are reduced, ranging from 21m to 52m AGL. Maximum, assumed heights for the Infrastructure Areas are have also reduced ranging from a maximum of 2 to 7m AGL. The maximum height south of the M62 is reduced from 16m to 7m AGL.

Evolution of Scope

- 2.15 Whilst the EIA Scoping Report (**Appendix 2.1**) sought to establish the overall framework for the ES in relation to the environmental topics and likely significant effects, the Project for Assessment and the strategies that underpin it have been refined or informed by further technical studies, modelling and analysis works and engagement with consultees.
- 2.16 As a result, whilst the ES is based on the EIA Scoping consultation responses (**Appendix 2.2**), where the scope of the assessment proposed within the EIA Scoping Report has been altered or amended, this has been clearly identified within the Scope of Assessment section of **Technical Chapters 7 – 18**. This includes additional evidence and / or rationale for the alterations / related amendments to the scope of likely significant effects, where necessary. For completeness, an iterative scoping process has been applied to the following environmental topics whereby the scope of effects / receptors deviates from that set out in the EIA Scoping Report (with further clarification provided within the following Chapters):
- **Chapter 10: Air Quality;**
 - **Chapter 11: Biodiversity;**
 - **Chapter 12: Hydrology, Flood Risk and Water Resources;**
 - **Chapter 13: Ground Conditions and Contamination;**
 - **Chapter 15: Archaeology;** and
 - **Chapter 16: Built Heritage.**
- 2.17 There have also been some clarifications in some of the effects and the associated receptors, all clearly explained in **Technical Chapters 7 – 18**.
- 2.18 This is considered to be in accordance with paragraph 038 of PPG which states that:
“...where it becomes evident during the assessment process...that a particular

³ Some buildings will be retained with others proposed for demolition.

environmental factor is absent or unlikely to be significantly affected by a proposed development, there should be no need for further assessment of that factor even if it was identified in the scoping process...”

The Scope of the EIA

Technical Topics ‘Scoped In’ to the ES

2.19 Following the EIA Scoping exercise, the following technical topics and their associated likely significant environmental effects have been taken forward and assessed within the ES:

- Socio-Economics and Human Health;
- Transport and Access;
- Noise and Vibration;
- Air Quality;
- Biodiversity;
- Hydrology, Flood Risk and Water Quality;
- Ground Conditions and Contamination;
- Agriculture and Soils;
- Archaeology;
- Built Heritage;
- Landscape and Visual; and
- Climate Change.

2.20 The likely significant environmental effects considered within each technical topic are detailed within the relevant **Technical Chapters 7 – 18**.

Technical Topics ‘Scoped Out’ of the ES

2.21 As part of the EIA process, there were several technical topics and their associated environmental effects which were not considered to be significant. Therefore these were ‘scoped out’ of the EIA. These are as follows:

- Lighting;
- Waste;
- Minerals;
- Major Accidents and/or Disasters; and
- Microclimate:

- Daylight, Sunlight, Overshadowing,
- Glint and Glare; and
- Wind.

2.22 The evidence base to support ‘scoping out’ these technical topics is presented in the EIA Scoping Report (**Appendix 2.1**) and has been agreed as part of consultations for each technical topic as detailed in **Technical Chapters 7 – 18**. No further evidence is provided in the ES for scoping out these topics. Where mitigation informed the evidence base to ‘scope out’ the above topics, this has been captured within **Chapter 4: Development Specification – Project for Assessment, Chapter 5: Development Specification – Proposed Scheme, and/or Volume 3: Environmental Management Plan**.

Approach to Assessment

- 2.23 This section outlines the approach to the assessment of likely significant environment effects adopted, as reported within this ES.
- 2.24 The exact methodology for the assessment of likely significant effects of the Project for Assessment during the construction and operational stages is varied across each of the technical topics considered within the EIA, largely due to technical specific guidance and best practice. Therefore, each of **Technical Chapters 7 – 18** specifically sets out the relevant technical assessment methodologies.
- 2.25 However, there are several aspects to the approach which require consistency across the ES. Where necessary, this is discussed below with the aim to identify any nuances and how these have been accommodated with the approach.

Definition of the Project for Assessment

- 2.26 As noted in **Chapter 1: Introduction**, the EIA must consider the direct and indirect impacts of the whole of the comprehensive development project, the Project for Assessment. This includes:
- The Proposed Scheme for which outline planning permission is sought, as defined by the Application Boundary (**Figure 1.2**);
 - Residual part of the JPA 1.1 allocation excluding the Simister Island junction works and the South Heywood development (with the exception of potential access road which is considered part of the access strategy for the Project for Assessment);
 - Potential highways works – Remodelling works associated with the M62;
 - Potential highways works – Junction 3 of the M66;
 - Potential highways works – local highway improvements to Pilsworth Road (from Junction 3 of the M66) / Moss Hall Road junction;

- Clean water infrastructure – likely upgrades along Pilsworth Road to the United Utilities (UU) main; and
 - Additional land that may be required to deliver Biodiversity Net Gain (BNG) or compensatory habitat. This is identified as the potential off-site ecological mitigation area (POSEMA).
- 2.27 The Assessment Boundary and the additional land for POSEMA is identified in **Figure 1.1**.
- 2.28 The M60 Junction 18 Simister Island Interchange is the subject of a committed improvement scheme (subject to receiving Development Consent Order (DCO)) which is to be delivered by National Highways and will be considered as a Cumulative Project as discussed above.
- 2.29 The South Heywood development (planning application reference: 16/01399/HYBR) was submitted in 2016 and received planning permission in 2020. It was supported by an ES. Its exclusion from the Project for Assessment is justified as this was consented outside of the JPA 1.1 allocation process and benefits from an existing planning consent and has parts have already been completed.
- 2.30 This includes the construction of Queen Elizabeth II Way link road to the M62 Junction 19 and a small proportion of the homes. These element will also form part of the baseline as described below under '*Baseline Scenario for Use in the EIA*'.
- 2.31 As outlined above, a potential future access road through South Heywood is included as part of the Project for Assessment. However, no other part of this development is included as part of the Project for Assessment. The South Heywood to be brought forward in accordance with the current consent(s). For completeness, the consented scheme has been assessed as part of **Chapter 19: Assessment of Cumulative Effects**.
- 2.32 The Project for Assessment will be dependent on potential highways improvements. These are defined as Infrastructure Areas AAA-CCC and the assumed spatial footprint of the works are included within the Project for Assessment and are defined in **Figure 1.1** and **Figure 4.1 – 4.3**. These can be summarised as follows:
- **Potential Infrastructure Area AAA** – the area from the Three Arrows junction of Pilsworth Road / Moss Hall Road required for access / junction improvements, Pilsworth Road improvement works extending to the M66 Junction 3 and the area of potential M66 Junction 3 improvement works. It is understood that improvement works to M66 comprise smaller scale improvement incorporating active travel facilities. Initial phases will utilise highway infrastructure that already exists and will include these local highway improvements which are described as the 'western links';
 - **Potential Infrastructure Area BBB** – new M62 Motorway Access Mitigation: The area immediately north and south of the M62 which may be required for the remodelling/improvement works; and

- **Potential Infrastructure Area CCC** – a potential future vehicular connection between the South Heywood Masterplan Area (Cumulative Project 1, see **Figure 19.1**) and the wider JPA1.1 Allocation Site. No primary design details are available and the deliverability of the potential future vehicular connection will be a matter for when planning applications are made for those relevant areas.
- 2.33 The existing clean water network (operated by UU) will be upgraded along Pilsworth Road to the new main that UU installed at the corner of Pilsworth Road / QEII Way. These upgrades may be delivered by the JV and therefore have been considered as part of the Project for Assessment. However, this is not the case for the foul water network upgrades (again operated by UU) which will be extended along Pilsworth Road to the M66 and onwards to Pilsworth Way in the west. This is because this will not be delivered by the JV but by UU. For completeness, the foul water network upgrades will be assessed as part of the CIA and this is further detailed in **Chapter 19: Assessment of Cumulative Effects**.
- 2.34 The delivery of Biodiversity Net Gain (BNG) within the Project for Assessment is not finalised at this stage. There remains the potential for compensatory ecological habitat, which again has not been finalised at this stage. Therefore, additional land has been identified which may be required to ensure that the requirement for 10% BNG and wider ecological mitigation can be achieved. As outlined above, this is identified on **Figure 1.1** as the 'POSMA'. Should parts of all of the POSMA be required, the primary habitat type required will be grassland and the 'development' proposed would be minimal with no requirement to manage or change the existing hydrological regime. It is also understood that some existing agricultural production will still be possible within this area post habitat creation, such as hay and silage production and keeping cattle.
- 2.35 Birch Business Park is included within the Assessment Boundary. However, it is assumed that Birch Business Park will remain in-situ and operational, with only limited works associated with access and the alignment of Moss Hall Lane / Whittle Lane. Birch Business Park will therefore form part of the baseline.
- 2.36 As outlined above, there remains uncertainty with regard to the remodelling works associated with the M62. Therefore, for the purposes of the ES it has been necessary to assume that the existing Motorway Service Area (M62) Eastbound and Westbound will be demolished and may be replaced as part of the Project for Assessment.
- 2.37 There are three zones of existing properties to the north of the M62, shaded white on the **Figures 4.1** and **4.2**. These are included within the Assessment Boundary. However, it is assumed that they will remain in-situ and operational, with only limited works associated with access.
- 2.38 A Development Specification, providing a description of the Project for Assessment including the relevant components noted above, is provided in **Chapter 4: Development Specification –Project for Assessment**.
- 2.39 In addition, further details of the Proposed Scheme in isolation are provided in **Chapter 5: Development Specification –Proposed Scheme**.

The Full Extent of Development and Consideration of the Baseline Environment

2.40 Schedule 4, Paragraph 3 of the EIA Regulations, states that an ES should include:

“a description of the relevant aspects of the current state of the environment (baseline scenario)”.

- 2.41 Likely significant effects as a result of the Project for Assessment have been described in the ES in relation to the deviation from the baseline environment within the Assessment Boundary and / or relevant technical study areas.
- 2.42 Baseline data has been collected for the Assessment Boundary, as defined on **Figure 1.1**. This represents the maximum extent of permanent and temporary works associated with the components of the Project for Assessment.
- 2.43 However, due to the nature of the limited ‘development’ potentially proposed in the POSMA (also identified on **Figure 1.1**), it has not been considered necessary to collect the same level of baseline data in this area.
- 2.44 The baseline environment comprises the prevailing existing environmental characteristics and conditions of the Assessment Boundary and relevant technical study areas. Study areas are generally defined as a radius from the Site.
- 2.45 The establishment of the study areas for baseline data collections is based upon, where relevant and necessary:
- Site visits and surveys;
 - Desk-based studies;
 - Review of existing site-specific information or public literature;
 - Modelling;
 - Review of relevant national and local planning policies; and
 - Consultation with the relevant statutory consultees through the EIA process.
- 2.46 As described above under ‘*Definition of the Project for Assessment*’, the Project for Assessment includes areas which do not form part of the application. Therefore, access to some of the residual parts of the Assessment Boundary has not been possible, which has created limitations for some survey data collection, albeit this is generally limited. Where access has not been possible for survey data, the approach to assessment has been as follows:
- **Arboriculture** – the use of aerial mapping alongside observations from publicly accessible areas;
 - **Ecology** – data has been obtained for the spatial footprint defined in **Figure 11.3**, which is generally greater than the Application Boundary. Where this is not the case, worst case assumptions on habitat value and protected species have been defined, also informed by third party data collection (details of discussions with

GMEU regarding this approach are provided in **Appendix 2.3** and **Chapter 11: Biodiversity**);

- **Hydrology and Water Quality** – access to the brooks across the Assessment Boundary is considered sufficient to inform a robust hydrological model. There are areas where parts of the brook could not be accessed due to overgrown areas, however, this limitation has been considered reasonable;
- **Ground Conditions** – it is considered that desk based studies (**Appendix 13.1**) will be sufficient for the Project for Assessment with site investigations being undertaken as a planning condition to the Proposed Scheme;
- **Agricultural Land** – Agricultural Land Classification surveys have been undertaken for much of the Application Boundary. The data collected has been extrapolated across other areas of the Assessment Boundary where access was not possible (through analysis of soil profiles) (**Figure 14.1**); and
- **Built Heritage** – access to Egypt Farm has not been possible and due to the enclosed character of the farm, an assessment of its significance and setting has been limited to historic mapping and the HER data.

2.47 In relation to the above, the level of information obtained is considered to be sufficient to inform assessments detailed within the ES.

2.48 The baseline conditions for the purpose of the ES may vary dependent on the timing of the survey or the date when data sources have been accessed. All baseline conditions within **Technical Chapters 7 – 18** are based on data accessed or surveys conducted between November 2022 to January 2025 as listed in **Table 2.3**. Where relevant other data obtained from third parties may be older than 2022, though may still be relevant to the baseline scenario if there have been no notable changes or is the latest available information.

Table 2.3: Summary of Baseline Adopted within Technical Chapters 7 – 18

Chapter	Data Collection Type	Timeframe
Chapter 7: Socio-economic and Human Health	Desk-based study of publicly accessible socio-economic and human health data.	July 2024
	Desk-based study of publicly accessible socio-economic and human health data related to effects scoped into the assessment.	January 2025
	Economic impact modelling	January 2025
	Locality Assessment Report	July 2021
	Draft Transport Strategy, Arup	November 2022

Chapter	Data Collection Type	Timeframe
Chapter 8: Transport and Access	Transport for Greater Manchester (TfGM) Active Travel Study, Stage 1 – Draft	November 2022
	Model Agreement Statement	April 2024
	Production of the Northern Gateway Traffic Model (NGTM)	August 2024 onwards
	Review of Public Rights of Way	August and September 2024
	Active Travel Strategy – TfGM	Under determination ⁴
	Public Transport Strategy – TfGM	Under determination ⁴
	M66 J3 Improvement	Under determination ⁵
	Transport Assessment	April 2025
	Travel Plan	April 2025
Chapter 9: Noise and Vibration	Initial site visit	19 th March 2024
	Baseline Noise Survey (Appendix 9.1)	August – October, 2024
Chapter 10: Air Quality	Air Quality Constraints Report	12 th August 2021
	Baseline Air Quality Monitoring Survey (Appendix 10.1)	5 th June – 2 nd September, 2024
Chapter 11: Biodiversity	Badger (Appendix 11.1 and Figure 11.4)	June 2024 – November 2024
	Bats (roosting and foraging) (Appendix 11.2 and Figures 11.5 to 11.12)	April 2024 – October 2024
	Birds (non-breeding and breeding) (Appendix 11.3 and Figure 11.13)	Non breeding birds: October 2023 – March 2024 Breeding birds: March 2024 – July 2024
	Habitats (Appendix 11.4 , Figure 11.15 and Figure 11.16)	June 2024 – October 2024
	Amphibians (including Great Crested Newt) (Appendix 11.5)	June 2022 and June 2024
	Brown hare	October 2023 – October 2024
	Data Search / Desk Study	April 2024 – May 2024
	Hedgehog	October 2023 – October 2024
	Otter / Water Vole	June 2024, September 2024

⁴ Emerging TfGM documents.

⁵ Emerging National Highways and Bury Council documents.

Chapter	Data Collection Type	Timeframe
	(Appendix 11.6, Appendix 11.8 and Figure 11.17)	
	Reptiles (Appendix 11.7 and Figure 11.18)	May 2024 – September 2024
	Trees (Appendix 11.9)	November 2024
Chapter 12: Hydrology, Flood Risk and Water Resources	Site Walkover	May 2024
	Channel survey	September 2024
	Structures survey	September 2024
	Fluvial Modelling Report	December 2024
	Flood Risk Assessment	April 2025
	Drainage Strategy	April 2025
	Water Framework Directive Screening Assessment	April 2025
Chapter 13: Ground Conditions and Contamination	Geo-environmental and Geotechnical Desk Study and Coal Mining Risk Assessment Report (Appendix 13.1)	February 2025
Chapter 14: Agriculture and Soils	Initial desk appraisal of soils and Agricultural Land Classification (ALC)	July 2024
	Baseline soil and ALC survey (Appendix 14.1) across the Application Boundary.	October 2024
	Collection of information about the owner-occupied and tenanted farm businesses.	January 2025
Chapter 15: Archaeology	Geophysical Survey, Meadowcroft Fold ⁵	November 2020
	Pre-Application Discussion Report, Proposed Employment Development, Northern Gateway, Greater Manchester	March 2022
	Archaeological Evaluation	December 2022
	Archaeological Desk Based Assessment Appendix 15.1	February 2025
Chapter 16: Built Heritage	Initial Heritage Appraisal (Appendix 15.1 of the EIA Scoping Report)	September 2024
	Heritage Assessment (Appendix 16.1)	March 2025
	Landscape Site Visit and Viewpoint Survey	29 th February 2024

Chapter	Data Collection Type	Timeframe
Chapter 17: Landscape and Visual	Site visit to collect additional viewpoint photography	November 2024
	Verified Wireline Visualisations	January 2025
Chapter 18: Climate Change	Climate Change Assessment	June 2024
	High level review of potential GHG emissions	February 2025
	EIA Briefing Note: Peat (Appendix 2.4)	February 2025

- 2.49 Throughout the EIA, the origin of all third-party data, the dates of surveys and the dates when data sources have been accessed are clearly outlined within the relevant **Technical Chapters 7 – 18**, alongside any limitations or assumptions.
- 2.50 As outlined above under ‘*Definition of the Project for Assessment*’, much of the highways infrastructure and some housing associated with the South Heywood development has already been constructed. Across the ES, the delivered South Heywood highways infrastructure and completed housing will be considered as part of the baseline scenario. The exception to this is in relation to traffic related effects where the completed housing will be considered as part of the ‘development log’ of other projects. This is explained further under ‘*Assessment Scenarios*’ below.

Consideration of the Future Baseline

- 2.51 Schedule 4, Paragraph 3 of the EIA Regulations states that an ES should include:
- “...an outline of the likely evolution thereof (without implementation of the development) as far as natural changes from the baseline scenario can be assessed with reasonable effort on the basis of availability of environmental information and scientific knowledge”*
- 2.52 As required by the EIA Regulations, the ES reports the future baseline scenario under a ‘do nothing’ scenario, which is further discussed in **Chapter 6: Consideration of Alternatives**. However, the future baseline scenario is discussed within each of the **Technical Chapters 7 – 18**. These discussions consider potential changes to the Assessment Boundary and study area assuming no further development and the continuation of the existing management regime.
- 2.53 As set out under ‘The Full Extent of Development and Consideration of the Baseline Environment’, the assessments presented in the ES are largely based on the deviation from the existing baseline scenario (as future baseline conditions are presented for information purposes only). The ‘Assessment Scenarios’ section below specifies instances where there is a deviation from this approach.

Information to Inform the Assessment in the ES

- 2.54 As noted under ‘*Definition of the Project for Assessment*’, outline planning permission is only sought for part of the Project for Assessment.

- 2.55 The footprint of the Project for Assessment has been defined on a series of 'EIA Assessment Plans' (**Figures 4.1 – 4.3**). These dovetail with the plans for the Application. Their purpose was to allow the assessment of the whole of the comprehensive development project, but have no standing in terms of the planning consent.
- 2.56 The Parameter Plans for which planning consent is sought are **Figures 5.1 – 5.3**. They have been developed to provide a careful balance between flexibility and managing environmental impacts.
- 2.57 Overall, the Application is required to provide sufficient information about the Project for Assessment, such that both BC and RBC can reasonably be satisfied that they have sufficient information to decide that they have full knowledge of the likely significant environmental effects of the Proposed Scheme and the wider Project for Assessment.
- 2.58 Therefore, the assessments undertaken as part of the EIA and reported in this ES are based on the EIA Assessment Plans and Parameter Plans as described above alongside the descriptions provided in **Chapter 4: Development Specification –Project for Assessment** and **Chapter 5: Development Specification –Proposed Scheme**. Together, these are considered to provide the level of information required, in a single location, to inform a robust assessment of likely significant environmental effects.
- 2.59 It should be noted that parts of the Development Specification that relate to the wider Project for Assessment are based on a greater number of assumptions. This is because it has been necessary for the NGDV to define the final spatial footprints and description of development for the aspects that sit outside of their control. The assumptions and limitations are stated in **Chapter 4: Development Specification –Project for Assessment**.
- 2.60 As outlined above under '*Definition of the Project for Assessment*', there remains uncertainty around the potential highways improvements, particularly any remodelling works associated with the M62 and that this is as a result of their current status in advance of planning/development consent. The potential highways improvements would be delivered by 3rd parties and subject to separate planning applications/Development Consent Orders (DCOs). Preliminary early stage design options have been provided for Infrastructure Areas AAA and BBB. These options are indicative only.
- 2.61 For the purpose of the ES and to ensure that the assessment of the whole of the comprehensive development project, a 'snapshot' of the highways infrastructure is set out in **Chapter 4: Development Specification –Project for Assessment**. This snapshot includes assumptions on road layout and levels which are informed by indicative, draft or assumed layouts which was the best available information to inform reasonable assumptions within the ES at the time of writing.

Quantum of Development

- 2.62 The total development quantum specified in **Chapter 4: Development Specification – Project for Assessment** and **Chapter 5: Development Specification –Proposed Scheme** has been used to assess the likely significant environmental effects for the following disciplines:

- **Chapter 7: Socio-Economics and Human Health;** and
 - **Chapter 18: Climate Change.**
- 2.63 The quantum of development has been used as an input into the development traffic used in **Chapter 8: Transport and Access, Chapter 9: Noise and Vibration and Chapter 10: Air Quality.**
- 2.64 Within **Chapter 7: Socio-Economics and Human Health**, specifically in relation to estimating non B2/B8 operational employment, this has been based on a more realistic/feasible mix of potential uses (a mix of C1 and E class use) as opposed to an ultimate 'worst-case' (i.e. lowest-possible employment) scenario. This only relates to the non B2/B8 uses which is 10,000 sqm for the Project for Assessment and 5,000 sqm for the Proposed Scheme, as set out in **Chapter 4: Development Specification –Project for Assessment** and **Chapter 5: Development Specification –Proposed Scheme**, respectively. Therefore, this represent a relatively negligible proportion of overall non B2/B8 employment. Such assumptions will not influence the determination of magnitude within this assessment.
- 2.65 In terms of the development traffic and the scenarios assessed in **Chapter 8: Transport and Access, Chapter 9: Noise and Vibration and Chapter 10: Air Quality**, these are based on the maximum quantum of development as set out in **Chapter 4: Development Specification –Project for Assessment**. The exception is that for the traffic related studies, the 10,000 sqm of non B2/B8 was scoped out. This is because additional traffic generation from ancillary uses is unlikely as:
- They replace existing uses (e.g. the Motorway Services Area [MSA]);
 - Are accounted for in the existing traffic flows; and/ or
 - Are reliant on the wider B2/B8 uses and therefore do not generate additional traffic flows.
- 2.66 Therefore, the quantum consistently adopted across the Transport Assessment and traffic analysis is 1,024,500 sqm plus 200 dwellings and this is considered to be robust. The scenarios for assessment are detailed below under *Assessment Scenarios*, however, it is worth noting that at the time the ES was prepared, a scenario associated with the Proposed Scheme quantum (as set out in **Chapter 5: Development Specification –Proposed Scheme**) was not available and therefore this is represented by the Project for Assessment Scenario. The Proposed Scheme impacts will be lesser than the Project for Assessment given that the Proposed Scheme generates just 56.4% of the traffic associated with the Project for Assessment. Given this, using the Project for Assessment as a representation of the Proposed Scheme provides a worst case assessment.

Massing and Location

- 2.67 The massing and location of development as defined on **Figures 4.1 and 5.1** have been used to assess likely significant environmental effects for the following topics:
- **Chapter 16: Built Heritage;** and

- **Chapter 17: Landscape and Visual.**

Identification of Sensitive Receptors

2.68 Schedule 4, Paragraph 4 of the EIA Regulations states that an ES should include:

“a description of the factors specified in Regulation 4(2) likely to be significantly affected by the development: population, human health, biodiversity (for example fauna and flora); land (for example land-take), soil, (for example organic matter, erosion, compaction, sealing), water (for example hydromorphological changes, quantity and quality), air, climate (for example greenhouse gas emissions, impacts relevant to adaptation), material assets, cultural heritage, including architectural and archaeological aspects, and landscape”

- 2.69 Consistent with the EIA Regulations, the identification of the aspects of the environment likely to be significantly affected by the Project for Assessment has been identified and set out within the ‘sensitive receptors’ or ‘receptor groups’ section of each **Technical Chapters 7 – 18**. These are summarised in **Table 3.1** in **Chapter 3: Site Context**.
- 2.70 Consideration has been given to future sensitive receptors of the Project for Assessment (i.e. future residents) within a number of the Technical Chapters or supporting appendices, where applicable. Although the consideration of such receptors is not specifically required by the EIA Regulations, these receptors have been considered to provide certainty to BC and RBC that the Project for Assessment is unlikely to create future issues when operational. As such future receptors have been considered within the following Technical Chapters/documents, with further details of the specific receptors being assessed set out within the respective Chapters:
- **Chapter 7: Socio-economics and Human Health;**
 - **Chapter 8: Transport and Access;**
 - **Chapter 9: Noise and Vibration;**
 - **Chapter 10: Air Quality⁶;**
 - **Chapter 12: Hydrology, Flood Risk and Water Quality;**
 - **Chapter 13: Ground Conditions and Contamination;**
 - **Chapter 17: Landscape and Visual; and**
 - **Chapter 18: Climate Change.**

Assessment Scenarios

2.71 In accordance with the EIA Regulations, the EIA has assessed the likely significant effects arising from the Project for Assessment, taking account of demolition, site

⁶ Future residential receptors in relation to Assessment Plot FF are scoped of the assessment within **Chapter 10: Air Quality**, but are considered within the supporting appendix (**Appendix 10.1**).

preparation / enabling works, earthworks, and construction (collectively referred to as 'construction') and operational stages.

2.72 In order to provide an assessment of a reasonable 'worst-case', the following key scenarios have been assessed where relevant to each environmental topic (and likely significant effects):

- **Peak construction** – this will vary across environmental topics and will not be attributed to a specific year, rather it will be determined at what point the worst-case effect could occur. This will be clearly defined within the technical assessments reported in the ES; and
- **Operation (2045)** – this will consider the environmental effects associated with the full operation of the Project for Assessment, once completed. The exception to this are climate change and traffic related effects which are discussed below.

Climate Change

2.73 In order to assess the worst-case scenario, the Project for Assessment is assumed to be fully operational from 2035, roughly half way through the anticipated build out as the phasing of development is not fixed. This provides a reasonable worst case considering that operational GHG emissions will reduce over time. Operational GHG emissions are assessed up to the end of 2037 to enable comparison with the UK carbon budgets ending 2037. GHG emissions will continue beyond this point, however as the Project for Assessment will be all-electric, GHG emissions will reduce over time in line with the decarbonisation of the electricity network. Assessing beyond this point is not considered necessary.

Traffic Assessment Scenarios

2.74 The synergies between the Transport Assessment and the EIA are provided in Chapter 2 of the EIA Scoping Report (**Appendix 2.1**).

Scenarios for Assessment

2.75 For traffic related effects, the scenarios assessed, reflect an appropriate worst case assessment and are informed by a 'without development' or 'with development' scenario for 2032 or/and 2039.

2.76 The 2032 with development scenario makes an assumption on development delivered at this time. As outlined above, the **Transport Assessment** assumes that the 2032 with development scenario comprises a total quantum of 395,000 sqm of development to be operational. This is based on an approximate split 80% B8 use and 20% B2/B1(c) use.

2.77 The 2039 with development scenario assumes the completion of the Project for Assessment. As set out in **Chapter 4: Development Specification – Project for Assessment** and **Chapter 5: Development Specification – Proposed Scheme**, the timescales for the implementation of JPA 1.1 extend beyond 2039. However, 2039 has been identified due to the alignment with the Places for Everyone (PfE)⁶ plan period and is considered, in transport terms, to represent a 'worst-case' in terms of allocation build-out.

- 2.78 The 2032 and 2039 scenarios also test a scenario with and without any remodelling works associated with the M62 and a link through South Heywood. These scenarios also assume the implementation of the works at J3 of the M66; the Western Junction (Fowler Welch and Three Arrows); and the NH Simister Island works.
- 2.79 The scenarios include a 2024 baseline year which include an apportionment of the development log⁷ at the selected year, capped to assumptions on strategic growth.
- 2.80 A 2024 'with development' scenario has been provided as a sensitivity test for the EIA to ensure that development impacts reported in the EIA are not watered down as a result of assuming that other development is already in place and part of the baseline. This responds to the requirements for the EIA to consider the worst case % change against the baseline.
- 2.81 The scenarios also ensure it is clear what the traffic generation is for JPA 1.1, separately to JPA 1.2. Further information on the consideration of JPA 1.2 is provided in **Chapter 19: Assessment of Cumulative Effects**.
- 2.82 A 2047 scenario has also been assessed to meet guidance on the assessment of operational traffic noise. This scenario will be considered for this purpose only. For further information on the methodology for operational traffic noise, please refer to **Chapter 9: Noise and Vibration**.
- 2.83 A separate construction scenario has not been undertaken as it is considered that the operational traffic scenarios described above would represent the worst case of any combined construction and operational scenario.
- 2.84 For air quality related traffic effects, 2032 has not been considered within **Chapter 10: Air Quality** as it is considered that a 2039 scenario will assess a 'worst-case'. 2039 represents the maximum amount of traffic anticipated on the relevant links. Similarly a scenario with remodelling works associated with the M62 and a link through South Heywood has not been undertaken. As such, improved junction capacities, congestion and vehicle routing on the relevant highway links were not included in the analysis. This ensured robust modelling outputs, as air quality conditions are likely to improve should these measures proceed.
- 2.85 For **Chapter 10: Air Quality** and **Chapter 9: Noise and Vibration**, a 2024 'with development' scenario has been provided as a sensitivity test to ensure that development impacts reported in the EIA are not watered down as a result of assuming that other development is already in place and part of the baseline. This responds to the requirements for the EIA to consider the worst case change against the baseline. The results of this in relation to **Chapter 10: Air Quality** are set out in **Appendix 10.1**. The results of this in relation to **Chapter 9: Noise and Vibration** are set out in **Appendix 9.1**.

⁷ A development log has been created to inform the Transport Assessment and this is based on assumptions about when such projects will happen. This is the most reliable assumptions available.

Cumulative Impact Assessment

- 2.86 The TA has a different set of criteria for the selection of ‘cumulative projects’ or ‘committed development’ to that of the EIA.
- 2.87 A development log has been created to inform the **Transport Assessment** and this is based on assumptions about when such projects will happen and when. This is the most reliable assumptions available. Therefore, traffic related effects in the EIA will be based on a greater number of cumulative projects than those specifically required as part of the EIA. Four of the Cumulative Projects⁸ included for assessment in the EIA (**Chapter 19: Assessment of Cumulative Effects**) are not included in the development log but are likely to be accounted for within the network growth included in the traffic flows.
- 2.88 The only cumulative project considered as a separate cumulative traffic scenario (outside of the development log) is a site known as JPA 1.2⁹. JPA 1.2 is allocated within the PfE as part of the Northern Gateway cross boundary strategic allocation and it is being progressed by the NGDV. Given the location of JPA 1.2 and likely common receptors with the Project for Assessment it is considered appropriate to assess the potential impact of this Cumulative Project¹⁰ separately. Further information is provided in **Chapter 19: Assessment of Cumulative Effects**.

Implementation of Mitigation and Monitoring

- 2.89 Schedule 4, Paragraph 7 of the EIA Regulations states that an ES should include:
- “a description of the measures to avoid, prevent, reduce, or if possible offset any identified significant adverse effects on the environment and, where appropriate, of any proposed monitoring arrangements (for example the preparation of a post-project analysis). That description should explain the extent, to which significant adverse effects on the environment are avoided, prevented, reduced or offset, and should cover construction and operational phases.”*
- 2.90 Regulation 26 states that when determining an application consideration should be given to ‘whether it is appropriate to impose monitoring measures’ including the parameters to be monitored and the duration of the monitoring.
- 2.91 In accordance with IEMA Guidance and the EIA Scoping Report (**Appendix 2.1**), three types of mitigation have been identified and used within the ES, comprising;
- **Primary:** modifications to the location or design of the Project for Assessment / Proposed Scheme made during the pre-application stage that are an inherent part of the project;

⁸ Cumulative Project 2: Land at the junction of Hollins Brook Way / Pilsworth Road, Cumulative Project 9: Shaw Distribution Centre; Cumulative Project 12: Pilsworth Lake/Fisheries and Cumulative Project 15: Trub Farm (see **Figure 19.1** and **Chapter 19: Assessment of Cumulative Effects**).

⁹ Policy JP Allocation 1.1: Heywood / Pilsworth (Northern Gateway) within Greater Manchester’s Places for Everyone (PfE) Joint Development Plan Document in March 2024

¹⁰ Cumulative Project 13 (see **Figure 19.1** and **Chapter 19: Assessment of Cumulative Effects**).

- **Secondary:** actions that will require further activity in order to achieve the anticipated outcome and secured by planning condition / and or obligation; and
 - **Tertiary:** actions that would occur with or without input from the EIA feeding into the design process. These include actions that will be undertaken to meet other existing legislative requirements or actions that are considered to be standard practices used to manage commonly occurring environmental effects. There needs to be a 90% level of confidence that these will be implemented, and they need to be specific with a clear timescale for implementation and responsibility. If this is not achieved, we will remain open to legal challenge.
- 2.92 Primary and tertiary mitigation are considered to be integral to / part of the Project for Assessment/Proposed Scheme. Where relevant, the primary and tertiary mitigation are set out in **Chapter 4: Development Specification – Project for Assessments** and in **Chapter 5: Development Specification – Proposed Scheme**.
- 2.93 **Technical Chapters 7 – 18** have considered relevant primary and tertiary mitigation for both the construction and operational stages prior to undertaking their assessment of likely significant effects. The mitigation committed to / assumed is clearly set out in advance of each assessment section.
- 2.94 Following the conclusion of effects based on the Project for Assessment / Proposed Scheme (inclusive of primary and tertiary mitigation) any further mitigation measures or monitoring arrangements have been identified (i.e. secondary mitigation).
- 2.95 Secondary mitigation is to be included within the ES following the assessment of effect, under the 'secondary mitigation or enhancement' section, before the reporting of the 'residual' effects. Therefore, only residual effects will account for secondary mitigation.
- 2.96 The application of secondary and tertiary mitigation is only considered appropriate if there is 90% level of confidence that these will be implemented, and they need to be specific with a clear timescale for implementation and responsibility.
- 2.97 The primary, tertiary and secondary mitigation measures identified through the EIA process (including mitigation set out in the EIA Scoping Report (**Appendix 2.1**) and **Technical Chapters 7 – 18**) are set out in **Volume 3: Environmental Management Plan**.
- 2.98 Secondary mitigation included in **Technical Chapters 7 – 18** have been reviewed to determine if indirect significant effects would occur as a result of its implementation, that are not already considered within the ES. It has been determined that there is one secondary mitigation measure that may affect receptors which are not assessed within the ES. This is the proposed junction improvement works of the A58 Bridge Street/ Bury Street and Pilsworth Road identified within **Chapter 7: Transport and Access**.
- 2.99 The junction improvement works would require the demolition of one or both buildings adjacent to the east and west of Pilsworth Road and the A58. The building on

the east is a public house and the buildings to the west comprise of three terraced house. The buildings are not Listed¹¹.

Determining Level of Effect and Significance Criteria

2.100 A four-step approach has been adopted to define effects. The four steps comprise the following, which are discussed further below:

- Step 1: Define the environmental sensitivity (or value, importance, etc.) of a receptor;
- Step 2: Define magnitude of change (or impact) from the baseline conditions;
- Step 3: Assignment of the level of effect; and
- Step 4: Determination of significance.

2.101 The method for assessing the level of effect has varied between technical topics but in principle has been based on:

- The environmental sensitivity (or value / importance etc., as appropriate to the environmental topic) of a receptor or receiving environment to change, including aspects such as adaptability, tolerance or recoverability; and
- The magnitude of change (or impact) from the baseline conditions, including aspects such as probability / likelihood of occurrence, geographical extent, complexity, duration, frequency and reversibility (i.e. temporary and permanent).

2.102 Sensitivity (or value/importance etc.) has been assessed on a scale of high, medium, low and negligible and magnitude of change on a scale of large, medium, small and negligible. Where deviations from these scales is required to meet specific technical guidance, this is outlined, where relevant, in **Technical Chapters 7 – 18**.

2.103 Other factors such as feedback from stakeholders, relevant legislation, international / national / regional / local standards and guidance and the inter-relationship between effects (both cumulatively and in terms of potential effect interactions) have also been considered, where appropriate.

2.104 The assignment of the level of effect has been based on professional judgement and the matrix below (**Table 2.5**) is intended to be a tool to assist with the process. Whilst the matrix provides ranges, this is to guide the competent expert and a definitive assessment of level of effect has been provided for each effect.

¹¹ <https://magic.defra.gov.uk/home.htm> (accessed 14th March 2025)

Table 2.4: Matrix to support determining the level of effect

Magnitude of Change (or impact)	Sensitivity (or value / importance)				
		High	Medium	Low	Negligible
	Large	Major	Moderate to Major	Minor to Moderate	Negligible
	Medium	Moderate to Major	Moderate	Minor	Negligible
	Small	Minor to Moderate	Minor	Negligible to Minor	Negligible
	Negligible	Negligible	Negligible	Negligible	Negligible

- 2.105 The level of effects has been classified on a scale of major, moderate, minor, or negligible, with each effect being either adverse or beneficial. **Technical Chapters 7 – 18** provide clear definitions for each level of effect, based on technical guidance or professional judgment.
- 2.106 For some specific environmental topics, guidance on the nature of the effect requires that differing criteria or scales for determining level of effect are to be used. Where this is the case, this is set out in **Technical Chapters 7 – 18**. However, there has been consistency of terminology and conclusions to tie in with the above matrix. This ensures that the conclusions of the different effects can be compared during the decision-making process and robustly considered within the cumulative effects assessment (see **Chapter 19: Assessment of Cumulative Effects**).
- 2.107 A conclusion has then been provided as to whether the effect is ‘Significant’ or ‘Not Significant’ based on professional judgement. As such, significance has only been concluded for residual effects (i.e. following the application of ‘Secondary Mitigation or Enhancement’ measures).
- 2.108 Effects have also been described in line with the requirements of the EIA Regulations (i.e. as direct or indirect, short / medium / long-term and temporary or permanent).
- 2.109 **Technical Chapters 7 – 18** provide a summary of effects table, which outlines the effects assessed, associated sensitive receptors, residual effects and whether the effect is ‘Significant’ or ‘Not Significant’.
- 2.110 Cumulative effects have been considered as a single co-ordinated assessment (**Chapter 19: Assessment of Cumulative Effects**). The cumulative effects assessment includes for both effect interactions and in-combination effects.

Reporting Effects and Mitigation for the Proposed Scheme, Separately from the Project for Assessment

- 2.111 As outlined above under ‘*Definition of the Project for Assessment*’, the Project for Assessment is different to the Proposed Scheme, for which outline planning permission is sought.

2.112 The decision-making for the planning consent will need to be linked to the residual effects and mitigation defined for the planning application. To achieve this, as outlined within the EIA Scoping Report (**Appendix 2.1**) the ES has:

- Identified and described the Project for Assessment (**Chapter 4: Development Specification – Project for Assessment**) as well as the Proposed Scheme in isolation (**Chapter 5: Development Specification – Proposed Scheme**) (alongside its primary and tertiary mitigation);
- Concluded on the level of effects for the Proposed Scheme in isolation and well as together as part of the Project for Assessment. This has been consistent for each environmental topic and as part of the summary of effects;
- A summary of effects has been provided for both the Project for Assessment (**Chapter 20: Summary – Project for Assessment**) and the Proposed Scheme in isolation (**Chapter 21: Summary – Proposed Scheme**); and
- Identified any specific secondary mitigation that is triggered by the Proposed Scheme in isolation separately to secondary mitigation that is triggered by the residual parts of the Project for Assessment, unless secondary mitigation is identical.

2.113 It is the secondary mitigation, triggered by the Proposed Scheme which can be controlled by planning condition or other mechanism and this will be clearly defined as part of the **Volume 3: EMP**. The mitigation associated with the residual part of the Project for Assessment will be a matter for when planning applications are made for those relevant areas.

EIA Requirements at Later Stages

2.114 The ES has identified and assessed likely significant effects based on the information outlined above. This has ensured that all likely significant effects have been assessed and will inform the determination of the planning application, in accordance with PPG.

2.115 Should there be a change to the information outlined above or quantum and details, there may be a requirement to review any such details to determine any likely significant effects on the environment not previously identified. Any associated assessments will then be undertaken as required, at that stage.

Co-ordination with Habitats Regulation Assessment

2.116 Regulation 27 of the EIA Regulations states:

‘Where in relation to EIA development there is, in addition to the requirement for an EIA to be carried out in accordance with these Regulations, also a requirement to carry out a Habitats Regulation Assessment, the relevant planning authority or the Secretary of State, as the case may be, must, where appropriate, ensure that the Habitats Regulation Assessment and the EIA are co-ordinated’.

2.117 A **shadow Habitat Regulations Assessment (sHRA)** has been submitted in support of the Application. The following internationally designated sites have been considered:

- Rochdale Canal Special Area of Conservation (SAC) 3.5 km east of the Assessment Boundary;
- South Pennine Moors SAC, 17 km east of the Assessment Boundary;
- Peak District Moors (South Pennine Moors [Phase 1] Special Protection Area [SPA] 11 km east of the Assessment Boundary; and
- Manchester Mosses SAC (Holcroft Moss Component), 20km west of the Assessment Boundary.

2.118 Consultation has been undertaken with Natural England as part of the Discretionary Advice Service. The internationally designated sites for consideration and scope of effects were agreed. Further information is set out in **Chapter 11: Biodiversity**.

2.119 The **sHRA** considers the Assessment Boundary and also considers in-combination effects on the internationally designated sites.

2.120 Following an appraisal as part of the **sHRA** the following effects were screened in and subject to assessment:

- **Loss of Functionally Linked Land (South Pennine Moors SAC) during construction** – it has been concluded that the Assessment Boundary is not functionally linked to the SAC. In terms of in-combination effects, the loss of functionally linked land is considered to be negligible. This is as a result of the distance of Cumulative Projects from the Assessment Boundary or/and the Cumulative Projects being unsuitable for supporting large numbers of assemblage species; and
- **Degradation through air pollution (Manchester Mosses SAC [Holcroft Moss Component]) during operation** – impacts associated with a variation in traffic flows are acknowledged, alone and in-combination and mitigation is required. This is as a result of the proximity of the M62 to the SAC. This is in accordance with the Habitats Regulations Assessment (HRA) undertaken by Ricardo Energy & Environment and The Greater Manchester Ecology Team in support of the Places for Everyone (PfE) Plan. This included an Appropriate Assessment to determine the potential for air quality effects at the relevant ecological designations as a result of all PfE Plan allocations in-combination with other plans and projects. The Natural England (NE) and Institute of Air Quality Management (IAQM) guidance documents state that for individual planning applications, where European designations are a consideration, it is acceptable to adopt the assessment, reasoning, and conclusions of the Local Plan HRA that considers said application. The PfE Plan HRA concluded that a likely significant effect could be ruled out subject to implementation of appropriate management practices. These are to be funded through planning linked financial contributions based on the quantum of development associated with each consent. The relevant mechanism for this measure is provided in the Draft Holcroft Moss Planning

Obligations Joint Supplementary Planning Document (SPD), which has been produced by the GMCA.

- 2.121 The **sHRA** concludes that based upon the above, the competent authority should be able to conclude that there will be no significant adverse effects arising from the Project for Assessment on the conservation objectives of the qualifying species of the designated sites.
- 2.122 The above is coordinated with the EIA and such effects have been considered across **Chapter 11: Biodiversity** and **Chapter 10 Air Quality**, both of which are consistent with the sHRA in that residual effects to internationally designated Sites are not considered to be Significant.
- 2.123 With regards to assessment of cumulative effects, as detailed above (and in **Chapter 19: Assessment of Cumulative Effects**), the **Transport Assessment** has included a range of cumulative projects within a development log which is based on assumptions about when such projects will happen and when. This is considered to meet the requirements for HRA¹². This has informed traffic related effects within the **sHRA** (degradation through air pollution).
- 2.124 For non-traffic related cumulative effects (limited to functionally linked land) consideration has been given to those Cumulative Projects where an in-combination effect is considered possible. This is limited to 16 Cumulative Projects, all of which are co-ordinated with those set out in **Chapter 19: Assessment of Cumulative Effects**.

Co-ordination with the Water Framework Directive Assessment

- 2.125 The purpose of the Water Framework Directive (WFD) Assessment is to ensure that the Project for Assessment is in compliance with the objectives set out in the WFD and to consider the potential impacts to a waterbody.
- 2.126 The **WFD Assessment – Screening** considers the Assessment Boundary.
- 2.127 Consultation has been undertaken with the Environment Agency, who have commented upon the **WFD Assessment – Screening** and agreed to the approach, scope and conclusions. Further information is set out in **Chapter 12: Hydrology, Flood Risk and Water Quality**.
- 2.128 The first stage of the WFD assessment process, Screening, has been undertaken. The **WFD Assessment – Screening** has reviewed the opportunities for the Project for Assessment to contribute to the achievement of the environmental objectives, and work with BNG requirements to contribute to the achievement of the environmental objectives to meet 'Good Status'.

¹² As Regulation 63(1)a of The Conservation of Habitats and Species Regulations requires effects of the project '*alone or in combination with other plans or projects to be considered*'.

2.129 The **WFD Assessment – Screening** report provides a high-level screening of the waterbodies, activities and receptors that would require further consideration as outlined below:

Waterbodies

- Whittle Brook (Irwell); and
- Northern Manchester Carboniferous Aquifers Groundwater body.

Activities

- Construction of outfall pipes into onsite watercourses;
- Construction of crossings/bridges within Wetland Habitat Corridor and/or Landscape Mitigation;
- Construction of drainage features including attenuation features within the Landscape Mitigation;
- Dewatering during construction;
- Foundation and Stabilisation works during construction;
- Operation of crossings/bridges within Wetland Habitat Corridor and/or Landscape Mitigation;
- Operation of drainage features within Landscape Mitigation;
- Operation of enhancements of the brook corridors;
- Discharge of surface water to a surface waterbody during operation;
- Discharge of surface water to ground;
- Removal of agricultural drainage ditches;
- Changes to the hydrological regime due to the delineation of catchments through the surface water drainage strategy;
- Presence of foundation structures;
- Additional activities that may physically modify the watercourse; and
- Proposed enhancements.

Receptors

- All receptors, as many of these will be Plot dependant based on the activities proposed and the receptors present.

2.130 For the WFD assessment, due to the outline nature of the Application, there is not the level of information required to assess the above. For example, at this stage, we do not know where any crossing may be required. Therefore the waterbodies, activities

and receptors have been screened in and will be subject to assessment as part of Reserved Matters applications. This may include additional survey work if required. This approach has been agreed with the Environment Agency.

2.131 The above is coordinated with the EIA and such effects have been considered across **Chapter 12: Hydrology, Flood Risk and Water Quality** which assesses the following effects:

- Changes to biological and morphological features within the Main Rivers from structures within the Wetland Habitat Corridors;
- Changes to chemical status of the groundwater body from works that interface with the water table;
- Changes to quantitative status of the groundwater body from foundations and structures that interface with the groundwater flow; and
- Decrease in water quality as a result of runoff.

2.132 The requirements to prepare a WFD assessment as part of Reserved Matters applications for the top three effects is coordinated and is defined within the ES as secondary mitigation. This is also controlled as part of **Volume 3: Environmental Management Plan**.

Limitations and Assumptions

2.133 Schedule 4, Paragraph 6 of the EIA Regulations state that an ES should include:

“...details of difficulties (for example technical deficiencies or lack of knowledge) encountered compiling the require information and the main uncertainties involved”

2.134 Where **Technical Chapters 7 – 18** experience limitations or are based on assumptions these have been clearly identified within the relevant chapter.

References

¹ European Council Directive 92/43/EEC of 21 May 1992 on the conservation of natural habitats and of wild fauna and flora.

² The Water Environment (Water Framework Directive) (England and Wales) Regulations 2017.

³ Planning Practice Guidance (PPG) – Guidance: Environmental Impact Assessment, Paragraph: 002 Reference ID: 4-002-20140306. Available at: <https://www.gov.uk/guidance/environmental-impact-assessment> [Accessed: 22/10/2024].

⁴ IEMA (August 2024) Implementing the Mitigation Hierarchy from Concept to Construction.

⁵ West Yorkshire Archaeological Services (November 2020) Meadowcroft Fold, Northern Gateway, Greater Manchester – Geophysical Survey. Report No. 3486.

⁶ Greater Manchester’s Places for Everyone (PfE) Joint Development Plan Document in March 2024