



Yeargate Limited

LAND NORTH OF BIRCH BUSINESS PARK

Environmental Statement Volume I

Environmental Statement Volume I Chapter 5 –
Approach to EIA

August 2026

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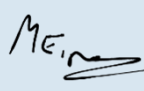
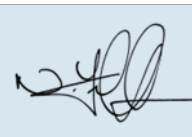
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5 APPROACH TO EIA

5.1 INTRODUCTION

- 5.1.1. This chapter outlines the approach to the Environmental Impact Assessment (EIA), in particular the objectives and overall strategy for the EIA developed by WSP and the wider Project Team. Scoping has been an ongoing process which is documented within this chapter, alongside the evidence base associated with those factors and elements scoped out of the assessment.
- 5.1.2. The approach to consultation is also outlined in this chapter, together with the approach to proportionate assessment including the assessment criteria and the methodology for assessing cumulative effects.
- 5.1.3. The EIA has been undertaken in accordance with the EIA Regulations 2017 (**Ref. 5.1**), National Planning Practice Guidance (**Ref. 5.2**), IEMA's Environmental Impact Assessment Guide to Shaping Quality Development (**Ref. 5.3**) and guidance specific to the factors assessed (as listed in technical chapters 6 to 16).
- 5.1.4. A detailed overview of the Site's status in relation to relevant planning policy is discussed within the Planning Statement, which has been submitted within the planning application alongside this Environmental Statement (ES).
- 5.1.5. This guidance provides a common governing framework and methodology for the entire environmental assessment as reported in this ES. Where exceptions have been made to the adoption of the approach in a particular discipline, it is described and explained in the relevant chapter, as is any occasion where guidance specific to a particular technical discipline has been applied, including assumptions and / or limitations which are particular to a single assessment.

5.2 OBJECTIVES OF THE EIA

- 5.2.1. The key objectives of the EIA are as follows:
 - Set the legal framework;
 - Document the consultation process;
 - Consider the alternatives to the Proposed Development;
 - Establish baseline environmental conditions at the Site and within the surrounding area;
 - Identify likely significant environmental effects during the design process so that some effects can be avoided, prevented, reduced or, if possible, offset prior to the assessments within the ES (i.e. demonstrating an iterative approach to EIA);
 - Identify, predict and assess the environmental effects associated with the Proposed Development: beneficial and adverse; permanent and temporary; direct and indirect and short / medium / long term; significant or not significant;
 - Identify, predict and qualitatively assess the cumulative effects of the Proposed Development including those associated with the other developments;
 - Identify suitable mitigation measures to avoid, prevent, reduce or, if possible, offset likely significant adverse effects on the environment and identify the likely significant residual effects following the implementation of these measures; and
 - Identify monitoring measures where likely significant residual adverse effects are identified.

- 5.2.2. Although not a requirement of the EIA Regulations 2017, opportunities for environmental enhancement are also explored.

5.3 SCREENING (REGULATIONS 5, 6 AND 7) AND SCOPING (REGULATION 15)

SCREENING

- 5.3.1. As set out in **Chapter 1: Introduction**, screening has not been undertaken for the Proposed Development. Through consultation with Rochdale Council (RBC) it was agreed that the Proposed Development would require EIA and therefore screening was not required.

FACTORS/ELEMENTS SCOPED OUT OF THE ASSESSMENT

- 5.3.2. As part of the internal EIA scoping process, a number of factors and/or elements have been scoped out of the EIA and are therefore not reported in this ES. **Table 5-1** summarises this aspect of the process and the justification for scoping out these factors/elements.

Table 5-1 – Factors and elements scoped out of the assessment

Factor/element scoped out	Justification
Daylight, Sunlight and Overshadowing	The Proposed Development will aim to minimise the impact on daylight, sunlight and overshadowing to the surrounding areas. The proposed buildings' massing, height and distance to the sensitive receptors (such as residential buildings or outdoor amenity areas) will be considered to ensure that the impact of the Proposed Development is kept as low as possible. It is not anticipated that the height of either the B2 and B8 developments will exceed the heights of the surrounding industrial areas, therefore having minimal effect on the environment. Despite the sensitivity of the residential areas, significant effects arising from the Proposed Development during either the construction or operational phase are not anticipated. The location of the Proposed Development is of a significant distance from the residential area, and therefore will not present any daylight, sunlight or overshadowing effects. It is proposed that due to the absence of likely effects, including significant effects, Daylight, Sunlight and Overshadowing requires no further assessment in the EIA.
Arboriculture	An arboricultural survey has been undertaken in accordance with BS5837 and a separate Arboricultural Impact Assessment has been prepared as part of the planning application covering arboricultural impacts and mitigation. Chapter 10: Landscape and Visual Chapter 11: Ecology and of this ES will include a summary of the arboricultural impacts. It is therefore considered that no further assessment is required in the EIA.
Waste	Waste generated during the construction and operation of the Proposed Development will be managed in accordance with legal requirements and is not anticipated to result in any likely significant environmental effects since the waste is expected to be typical of that associated with commercial-led developments.

Factor/element scoped out	Justification
	In addition, during the construction phase the preference will be to re-use material on site, where possible, so that no significant volumes of excavated material need to be removed from the Site for off-site disposal. It is therefore considered that no further assessment is required in the EIA.
Traffic and Transport	
Construction traffic	Construction traffic movements are temporary in nature and it is anticipated that the majority of these will occur outside of the traditional peak hours for background traffic reflecting the start and finish times for workers on Site and day to day construction operations. As such, it is unlikely that the addition of construction traffic will have a detrimental effect on the operation of the junctions or highways serving the Site.
Other Issues	
Severe weather – storms and gales, cold and snow, heatwave and draught during construction and operation	The Proposed Development will be designed in accordance with the applicable safety standards to withstand such severe weather events.
Space weather – solar flares, solar energetic particles, coronal mass ejections Earthquakes / ground instabilities during construction Wildfires	There is no sources of these for the Site. The Site is not located within an area identified as being at elevated risk of wildfire and no likely significant environmental effects have been identified.
Volcanic eruptions	Volcanic eruptions occur outside of the UK and are not linked to the Proposed Development.
Human diseases during construction and operation	No likely significant environmental effects associated with human disease transmission have been identified
Animal diseases – diseases spread from animals to humans and diseases which cannot spread to humans	There is no pathway as the Proposed Development does not generate interaction with animals.
Electricity failure System failure	Any electricity or system failure will not impact EIA topics/receptors and may only limit construction work.
Major transport accidents during construction and operation	There is a risk of accidents including HGVs during construction. There is also a risk of additional HGV traffic causing accidents during operation. Measures within Chapter 6: Traffic and Transport will minimise and remove any likely significant effects.

Factor/element scoped out	Justification
Industrial and urban accidents during construction and operation	There are no sources close to the Site, according to the Health and Safety Executives COMAH search tool.
Industrial action during construction	Construction is not anticipated to be undertaken by labour associated with trade unions.
Public disorder	This is not anticipated. Public disorder is rare in the UK and where it does occur is typically in a larger urban area.
Malicious attacks – crowded places; transport systems; infrastructure; cyber attacks; and chemical, biological, radiological and nuclear	No credible pathway has been identified through which security-related incidents could give rise to likely significant environmental effects.
Unexploded ordnance (UXO) during construction	The UXO risk identified by Zetica is low.
Electro-magnetic fields	The Proposed Development will not introduce static electric and electromagnetic fields.
Exposure to high voltage during construction	The Proposed Development will likely include high voltages for construction, however these will be utilised in accordance with industry best practice to minimise harm and remove pathway.

5.4 CONSULTATION

- 5.4.1. In addition to the formal consultation undertaken in conjunction with the pre-application process, technical and public consultation has been undertaken.

TECHNICAL CONSULTATION

- 5.4.2. As part of the EIA process, technical consultation with a range of statutory and non-statutory consultees has been ongoing. Details of the technical consultation undertaken for each assessment is provided in the respective technical chapters.

PUBLIC CONSULTATION

- 5.4.3. Public consultation was undertaken by means of a letter drop. Further public engagement was undertaken to understand the opinions of local people and stakeholders comprising the following:
- Distributing letters (via Royal Mail) to the nearest residential properties and businesses to the Site;
 - Issuing of letters to local Ward Councillors inviting them to a meeting if requested;
 - Providing an email address for comments to be provided

5.5 APPROACH TO THE ASSESSMENT OF THE PROPOSED DEVELOPMENT

- 5.5.1. This section outlines the phases of the Proposed Development that have been assessed, together with the approach to the baseline conditions, future baseline conditions, cumulative effects and design tolerances. It also sets out the overarching approach to the EIA, together with project specific requirements for the assessment of effects.
- 5.5.2. The Proposed Development has been assessed against the description, design principles and tolerances and supporting plans as detailed in **Chapter 3: Description of the Proposed Development**. The maximum extent of the planning application boundary and building footprint / height has been assessed as the maximum parameters. There is therefore some degree of flexibility to allow the Proposed Development to evolve (i.e. reduce in size) if necessary.

BASELINE SCENARIO

- 5.5.3. Baseline information (environmental characteristics and conditions) has been collated based upon surveys undertaken and desk based information available at the time of the assessment. Technical chapters 6 to 16 provide details of the baseline information and a summary is provided in **Chapter 2: The Existing Site**. Any limitations in establishing the baseline are described in technical chapters 6 to 16.
- 5.5.4. The baseline conditions for the purpose of the ES are representative conditions as of July 2026, any differences from this scenario will be clearly outlined within technical chapters 6 to 16.
- 5.5.5. The dates of surveys and the dates when data sources have been accessed are provided within technical chapters 6 to 16.

FUTURE BASELINE

- 5.5.6. The assessment has also taken into consideration the likely evolution of the current state of the environment (baseline scenario) without implementation of the Proposed Development, as far as natural changes from the baseline scenario can be assessed with reasonable effort on the basis of the availability of environmental information and scientific knowledge, known as the future baseline.
- 5.5.7. The future baseline scenario is summarised in **Chapter 2: The Existing Site** and technical chapters 6 to 16.
- 5.5.8. Due to the limitations, necessary assumptions and lack of evidence associated with the future baseline (i.e. it cannot be accurately measured), a detailed consideration of the effects of the Proposed Development against the future baseline would generally not result in a robust assessment. However, consideration has been given, in descriptive terms, within each technical chapter of the likely significant environmental effects arising from the Proposed Development in relation to the future baseline.
- 5.5.9. For some assessments, such as **Chapter 8: Air Quality**, **Chapter 7: Noise and Vibration** and **Chapter 6: Traffic and Transport**, the future baseline are a required part of the methodology. Further detail is provided in each of these chapters, where relevant.

ASSESSMENT OF MAJOR ACCIDENTS AND DISASTERS

- 5.5.10. Schedule 4(8) of the EIA Regulations 2017 states that the ES must include the following:
“A description of the expected significant adverse effects of the development on the environment deriving from the vulnerability of the development to risks of major accidents and/or disasters which

are relevant to the project concerned.... Where appropriate, this description should include measures envisaged to prevent or mitigate the significant adverse effects of such events on the environment and details of the preparedness for and proposed response to such emergencies”.

- 5.5.11. As stated in **Table 5-1**, due to the nature of the Proposed Development, it is unlikely that major accidents and/or disasters could occur. Measures are included in the Construction Environmental Management Plan (CEMP) to limit the risk of major accidents and/or disasters during construction and all required processes will be followed in relation to the design and maintenance of the Proposed Development, such as:
- **Flooding:** The majority of the Site is located within a Flood Zone 1 (i.e. it has a low probability of flooding from rivers or the sea). The effect of changes to the risk of flooding during the construction and operational stages are not anticipated to be significant. Therefore, the risk of a major accident or disaster associated with flooding is considered to be as low as reasonably practicable;
 - **Security:** Major accidents or disasters relating to security could occur, for example, due to vandalism, arson or terrorist events. The Proposed Development will incorporate security measures which will reduce the risk of a major accident or disaster related to security to as low as reasonably practicable, for example, the erection of security hoarding during the construction stage, and security measures such as work areas being fenced off from the general public will be implemented on Site during operation;
 - **Severe Weather:** Severe weather includes storms and gales, lightning, sub-zero temperatures and heavy snow and heatwaves. The Proposed Development will be designed in accordance with the applicable safety standards to withstand such severe weather events. Therefore, the risk of a major accident or disaster associated with severe weather is considered to be as low as reasonably practicable.
 - **Construction:** Major accidents and disasters associated with the construction of the Proposed Development are considered to be as low as reasonably practicable. The construction of the Proposed Development will be managed and undertaken by competent contractors and will be subject to suitable method statements for all activities;
 - **Fire:** The design of the Proposed Development will follow good practice guidance to reduce the risk of a major accident or disaster associated with fire during the operational stage of the Proposed Development to as low as reasonably practicable. In addition, fire suppression systems would be included in the detailed design where required; and
 - **Unexploded Ordnance (UXO):** The Site is located within an area described as at low risk of UXO (**Ref. 5.4**), therefore the risk of a major accident or disaster associated with UXO is considered to be as low as reasonably practicable.
- 5.5.12. This review did not identify any likely significant effects from major accidents or disasters that would require assessment under the EIA Regulations 2017, and therefore major accidents and disasters are not considered further in this ES.

PHASES OF THE PROPOSED DEVELOPMENT

- 5.5.13. Consideration has been given to construction and operational phases of the Proposed Development. An overall summary of the anticipated construction and operational phase timeframes is presented in **Chapter 3: Description of the Proposed Development**, which has been considered in technical chapters 6 to 16.

DESIGN PRINCIPLES

- 5.5.14. Further information regarding design principles is provided in **Chapter 3: Description of the Proposed Development**. There will be a degree of flexibility within some of the parameter plans to allow the Proposed Development to evolve.

ASSESSMENT CRITERIA

- 5.5.15. The classification of each effect identified has been assessed based on the magnitude of change (or impact) due to the Proposed Development and the sensitivity/value of the affected receptor to change, as well as a number of other factors that are outlined in more detail below. The classification of residual effects has been assessed with regard to the extent to which additional mitigation measures will avoid, prevent, reduce or, if possible, offset adverse effects or enhance beneficial effects.
- 5.5.16. The assessments of likely effects presented in technical chapters 6 to 16 have taken into account a number of criteria to determine whether or not the likely effects are significant in terms of the EIA Regulations. Wherever possible and appropriate, the effects have been assessed quantitatively. The following criteria have been taken into account when classifying the likely effects:
- Relevant legislation and planning policy;
 - International, national, regional and local standards;
 - Likelihood of occurrence of the effect;
 - Geographical extent of effect;
 - Sensitivity and/or value of the receptor;
 - Magnitude and complexity of impact;
 - Whether the effect is temporary or permanent;
 - Duration (short, medium or long-term), frequency and reversibility of effect;
 - Whether the effect is direct or indirect, secondary or transboundary;
 - Inter-relationship between different effects (both cumulatively and in terms of likely effect interactions); and
 - The outcomes of consultations.
- 5.5.17. Where factor specific methodology deviates from this approach, for example, as a result of following factor specific guidance, this is set out in the methodology section of the technical chapter.

SENSITIVITY/VALUE OF RECEPTORS

- 5.5.18. The sensitive receptors considered within this ES are identified within technical chapters 6 to 16. The sensitivity of these receptors to change is also defined within technical chapters 6 to 16 and has been determined where available and appropriate by quantifiable data, the consideration of existing designations and professional judgement. The categories used (high, medium, low and negligible), unless otherwise stated, are shown in **Table 5-2**. Where factor specific methodology deviates from this approach, for example, as a result of following factor specific guidance, this is set out in the methodology section of the technical chapter.

MAGNITUDE OF CHANGE (IMPACT)

- 5.5.19. The magnitude of change (impact) is predicted as a deviation from the established baseline conditions, as a result of the Proposed Development. The magnitude of these changes is also defined within technical chapters 6 to 16 and has been determined where available and appropriate by quantifiable data, available appropriate national and international standards or limits (World

Health Organisation (WHO) Limits, European Union (EU) Quality Standards, etc.) and professional judgement. The scale used (high, medium, low and negligible), unless otherwise stated, is shown in **Table 5-2**.

- 5.5.20. The magnitude of change identified is based on the peak potential magnitude of change, i.e. the greatest likely magnitude of change that may be experienced by a sensitive receptor (existing or proposed).

CLASSIFYING EFFECTS

- 5.5.21. Determining the classification of effects has been undertaken using professional judgements (assumptions and value systems) that underpin the attribution of significance. Each effect has been assessed against the sensitivity of the receptor and the magnitude of change.

Assessment of Effects and Significance

- 5.5.22. The assessment of likely significant effects has been undertaken in accordance with the Town and Country Planning (Environmental Impact Assessment) Regulations 2017 (as amended) and informed by current good practice guidance, including guidance published by the Institute of Environmental Management and Assessment (IEMA).
- 5.5.23. The assessment is based on professional judgement and topic specific criteria. A rigid numerical or matrix based approach has been avoided, consistent with IEMA guidance, in order to ensure that the assessment remains transparent, proportionate and responsive to the specific characteristics of the Proposed Development and its receiving environment.
- 5.5.24. For each topic, the assessment considers the interaction between the **sensitivity of the receptor** and the **magnitude of change**, taking account of the following factors where relevant:
- the importance or value of the resource or receptor (international, national, regional or local);
 - the magnitude and spatial extent of the impact;
 - the duration and frequency of the impact (temporary or permanent);
 - the reversibility of the impact; and
 - the number, vulnerability and sensitivity of affected receptors.

The detailed application of these criteria is set out within each topic chapter, alongside any topic-specific guidance or standards used to inform the assessment.

Significance	Criteria
Major	These effects are likely to be important considerations at a regional or district scale but, if adverse, are potential concerns to the project, depending upon the relative importance attached to the issue during the decision making process.
Moderate	These effects, if adverse, while important at a local scale, are not likely to be key decision making issues. Nevertheless, the cumulative effect of

	such issues may lead to an increase in the overall effects on a particular area or on a particular resource.
Minor	These effects may be raised as local issues but are unlikely to be of importance in the decision making process. Nevertheless, they are of relevance in the detailed design of the project.
Negligible	Effects which are beneath levels of perception, within normal bounds of variation or within the margin of forecasting error.

- 5.5.35. Effects assessed as **Moderate or Major** are considered **significant** for the purposes of the EIA Regulations. Effects assessed as **Minor or Negligible** are not considered significant but are reported to ensure transparency and to inform detailed design and mitigation where appropriate.
- 5.5.36. Cumulative assessment is required where the Proposed Development is assessed as giving rise to likely significant effects on its own, or where there is a realistic potential for non-significant effects to interact with other developments and give rise to significant cumulative effects.
- 5.5.37. This approach is supported by Planning Practice Guidance, which confirms that Environmental Statements should be focused on likely significant effects and be proportionate to the nature and scale of the development.
- 5.5.38. In terms of the duration of an effect, short-term has been considered as 2 year(s) (or below), a medium-term effect has been considered to be between 2 and 10 years in duration and a long-term effect has been considered to be greater than 10 years in duration. Any variation to these definitions arising, for example, from differences in assessment methodology or guidance is explained in technical chapters 6 to 16.

MITIGATION AND MONITORING

- 5.5.39. Additional (secondary and tertiary) mitigation describes actions that will require further activity in order to achieve the anticipated outcome, and measures that will be required regardless of any EIA assessment, as it is imposed, for example, as a result of legislative requirements and/or standard sectoral practices. Examples of secondary mitigation include additional detailed design to comply with elements such as proposed lighting limits. Examples of tertiary mitigation include considerate contractor's practices that manage activities which have potential nuisance effect (e.g. through the implementation of a CEMP).
- 5.5.40. Where likely significant adverse effects have been identified in the assessment, measures to avoid, prevent or reduce and, if possible, offset likely significant adverse effects on the environment are described. Monitoring is required where there are significant adverse residual effects. In some cases, for instance where there is uncertainty that residual effects remain, it may also be appropriate to implement monitoring.
- 5.5.41. Proposed additional mitigation and monitoring measures are set out within technical chapters where necessary. **Chapter 3: Description of the Proposed Development** sets out the embedded (primary) mitigation required as part of the Proposed Development. The mechanism by which the measures are to be secured is also recorded.

5.6 CUMULATIVE EFFECTS

- 5.6.1. Schedule 4(5)(e) of the EIA Regulations 2017 states that the ES should include a description of the likely significant effects of the development on the environment resulting from:
- ‘the cumulation of effect with other existing and / or approved projects, taking into account any existing environmental problems relating to areas of particular environmental importance likely to be affected or the use of natural resources.’*
- 5.6.2. Regulation (4)(2)(e) refers to the need to assess:
- ‘the interaction between the factors referred to in sub-paragraphs (a) to (d)’.*
- 5.6.3. There is no widely accepted methodology or best practice for assessing cumulative effects, although various guidance documents exist. The approach for assessing cumulative effects is summarised below. The approach adopted is based on previous experience, the types of receptors being assessed, the nature of the Proposed Development, the other developments under consideration and the information available to inform the assessment. The assessment of cumulative effects is presented in technical chapters 6 to 16 and **Chapter 17: Cumulative Effects**.
- 5.6.4. There will be no requirement to undertake a cumulative assessment for an ES chapter where the Proposed Development is assessed as giving rise to no likely significant effects on its own and there is no realistic mechanism by which non-significant effects could combine with other developments to result in significant cumulative effects.
- 5.6.5. As the wider separate EIA employment scheme (known as the Northern Gateway scheme – application ref. 25/00418/OUT) is undetermined at the time of assessment, it does not constitute a committed development. However, it is considered to be a reasonably foreseeable (emerging) development and is therefore taken into account for cumulative effects assessment only, where relevant on a topic-by-topic basis.
- 5.6.6. The Environmental Impact Assessment assessed the effects of the development cumulatively with other committed developments (those that have already commenced development or those that have not been commenced but have valid extant permission). Considerations have also been given to the interaction and effect of these developments. In summary, the two types of cumulative effects can be summarised as:
- 5.6.7. Intra project (combined) effects: the interaction of different environmental effects arising from the Proposed Development on the same receptor (for example, combined noise and air quality effects on residential receptors). These effects are assessed within the relevant technical topic chapters.
- 5.6.8. Inter project (cumulative) effects: the combined effects of the Proposed Development and other committed developments on the same receptor or resource. A list of committed developments is included within Appendix B. These effects are assessed where there is a reasonable potential for interaction and where the combined effects could result in a materially different outcome compared to the effects of the Proposed Development alone.
- 5.6.9. Those developments to be considered within the content of the Cumulative Impact Assessment are the wider Northern Gateway currently subject to a major application for outline permission (EIA development) for a national-scale employment development (B2, B8 uses) including education, local community and hotel (Ref. 25/00418/OUT).

- 5.6.10. Through analysis of RBC's online planning portal (**Ref. 5.5**), a number of other developments have been identified and are considered within this ES. Agreement upon these other developments to be sought from RBC. Further details regarding the scope and methodology of the assessment of cumulative effects, the identification of relevant other developments and a description of those included within the assessment are provided in **Chapter 17: Cumulative Effects**.

5.7 ENVIRONMENTAL ENHANCEMENT

- 5.7.1. Although not a requirement of the EIA Regulations 2017, opportunities for environmental enhancement are also explored. However, environmental enhancement measures are not taken account of in the assessment of likely significant effects.

5.8 LIMITATIONS AND ASSUMPTIONS

- 5.8.1. Schedule 4(6) of the EIA Regulations 2017 states that an ES should include
'...details of difficulties (for example technical deficiencies or lack of knowledge) encountered compiling the required information and the main uncertainties involved...'
- 5.8.2. Where there are limitations or assumptions used within the EIA, these are clearly identified in this ES. Limitations and assumptions specific to certain assessments have been identified in the appropriate technical chapters 6 to 16.

5.9 REFERENCES

- **Reference 5.1:** Town and Country Planning (Environmental Impact Assessment) Regulations 2017. Statutory Instrument 2017 No. 571.
- **Reference 5.2:** Planning Practice Guidance. [Online] accessed via <https://www.gov.uk/government/collections/planning-practice-guidance>
- **Reference 5.3:** IEMA Environmental Impact Assessment Guide to Shaping Quality Development. [Online] accessed via https://www.iema.net/assets/uploads/iema_guidance_documents_eia_guide_to_shaping_quality_development_v7.pdf
- **Reference 5.4:** Zetica UXO (2026). Risk Maps. Available at: <https://zeticauxo.com/downloads-and-resources/risk-maps/>
- **Reference 5.5:** Rochdale Borough Council Planning Portal. [Online] accessed via [Simple Search](#) (publicaccess.rochdale.gov.uk)

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