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Real Estate

Land East of Leeds Road, Chidswell

Environmental Statement - Volume 2 – Chapters 1 and 2

April 2020

Important notice: This Environmental Statement has been prepared by Deloitte Real Estate, with technical input from Re-form; Delta Simons; Patrick Parsons; Brooks Ecological; Pell Frischmann; and Cotswold Archaeology ("the Consultants"). Chapter 1, Volume 1 of this Environmental Statement sets out the parties responsible for preparing each Chapter and associated figures and appendices.

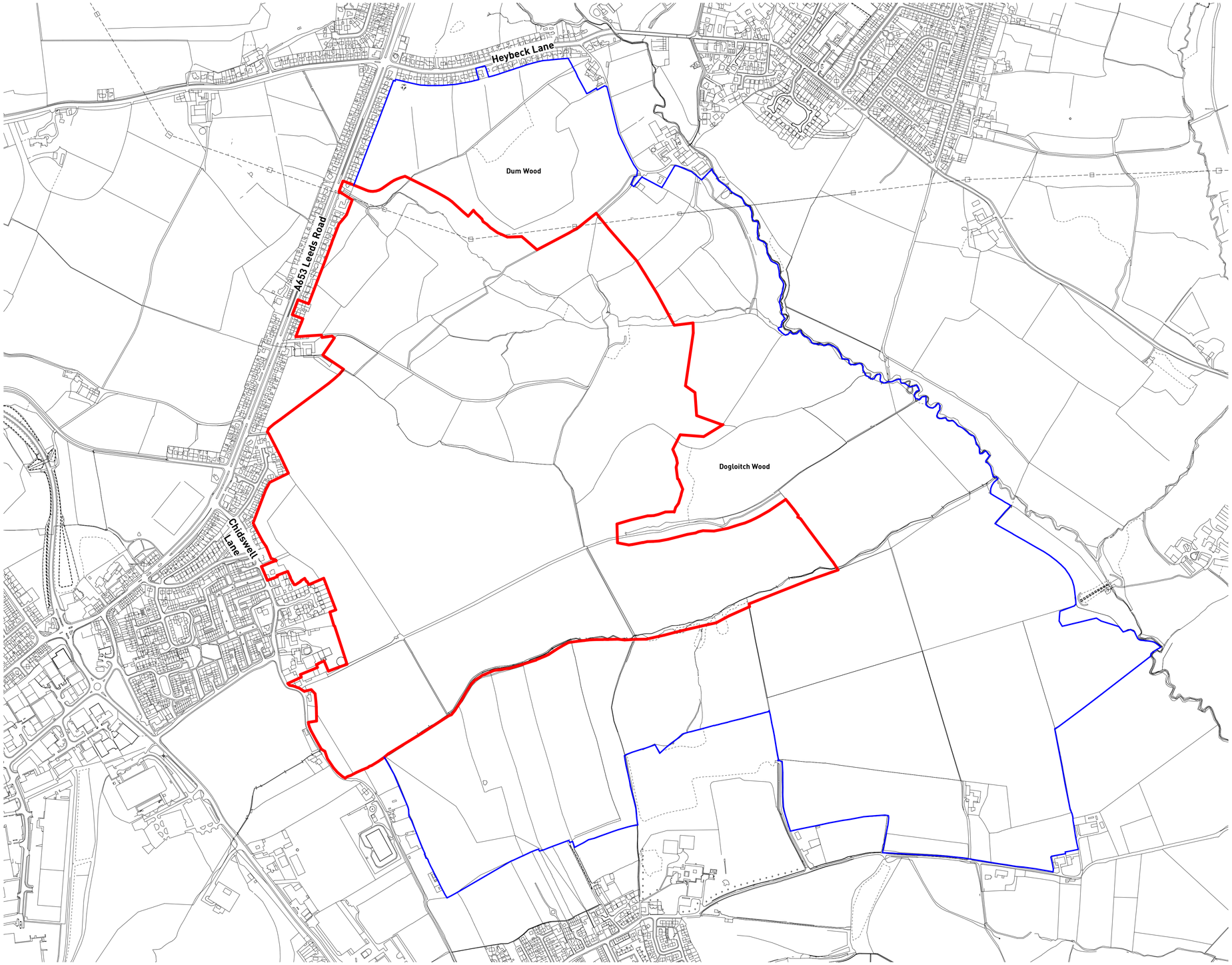
Although we have read the Consultants' reports for consistency and provide our observations based on our knowledge and experience, we accept no liability or responsibility for the Consultant's Reports and will not be responsible for the technical content of Chapters 7-14 and Chapter 15, Volume 1; nor Volume 2, nor the technical content of the associated separate Non-Technical Summary.

Table of Appendices (Volume 2)

Chapter	Appendix
1 Introduction	1.1 Site Location Plan
2 EIA Methodology	2.1 – EIA Screening and Scoping Report 2.2 – Kirklees Metropolitan District Council's EIA Scoping Response 2.3 – Committed Developments
3 Alternatives and Design Evolution	N/A
4 Site and Development Description	N/A
5 Construction Programme and Methodology	N/A
6 Socio-Economics	N/A
7 Landscape and Visual Impact	7.1 – Landscape and Visual Impact Assessment
8 Archaeology and Historic Environment	8.1 – Heritage Desk-Based Assessment 8.2 – Geophysical Survey Report
9 Noise and Vibration	9.1 – Baseline Noise Survey Details 9.2 – Acoustic Modelling and Predicted Noise Levels 9.3 – Glossary and Abbreviations
10 Air Quality	10.1 – Construction Phase Assessment Methodology 10.2 – Dispersion Modelling Input Parameters 10.3 – Dispersion Modelling Results
11 Flood Risk and Drainage	11.1 – Strategic Phasing Layout H18119-201
12 Contamination	12.1 – Phase 1 Geoenvironmental Desk Study Report 12.2 – Coal Mining Risk Assessment
13 Transport	13.1 – Transport Assessment 13.2 – Framework Travel Plan
14 Ecology	14.1 – HSI Assessment & Report 14.2 – Barn Owl Scoping Assessment & Report 14.3 – Ornithological Summary (Breeding Birds) 14.4 – Badger Assessment & Report 14.5 – Bat Roost Suitability Assessment & Report 14.6 – Bat Activity Survey 14.7 – Water Vole Report 14.8 – Reptile Survey 14.9 – Hedgerow Assessment & Report

	14.10 – Bat Roost Suitability Assessment 14.11 – Bat Emergence Survey
15 Type 1 Cumulative Effects	N/A
16 Summary of Residual Effects	N/A

1.1 Site Location Plan



Site Location Plan
1 : 5000

1 : 5000
0 100 200 300m

Notes.

Application boundary

Extents of land under applicants ownership

Rev.	Des.	By	Date	Ch.
B	Red line boundary updated;	DH	15/10/19	RG
A	Red line boundary updated;	DH	09/10/19	RG

Status: PLANNING

The Old Brewery
High Court
Leeds
LS2 7ES
Tel: 0113 242 3622
www.enjoy-design.co.uk

Client: The Church Commissioners		Job No: 18,006
Project: Chidswell Masterplan		
Title: Site Location Plan		
Date: 23/08/19	Scale: 1 : 5000@A1	Checked by: RG
Drawing No: 00-500	Drawn By: DH	Revision: B

ENJOY DESIGN

2.1 EIA Screening and Scoping Report

Deloitte.
Real Estate

Development of land at Chidswell

Environmental Impact Assessment (EIA) Scoping Report

September 2018

Contents

1 Introduction 3
2 Site Description and Development Proposals 5
3 Scope, Structure and Consultation 8
4 EIA Methodology 14
5 Socio-Economic Impact 18
6 Traffic and Transportation 20
7 Ecology and Nature Conservation 24
8 Landscape and Visual Impact 28
9 Archaeology and Built Heritage 30
10 Noise and Vibration 33
11 Air Quality 36
12 Flood Risk and Water Environment 39
13 Ground Conditions 42

1 Introduction

Introduction

1.1 This Environmental Impact Assessment (EIA) Scoping Report has been prepared in respect of development of land at Leeds Road, Chidswell ("the Site").

1.2 CC Projects ("the Applicant") will be submitting a planning application which will seek outline planning permission for a proposed residential development of up to 1,354 dwellings, 35 hectares of employment development, a primary school, local centre, green space and other associated infrastructure (the "Proposed Development"). All matters will be reserved excepted for access. The Proposed Development forms part of the proposed mixed-use allocation MX1905 in the Publication Draft Kirklees Local Plan which was submitted for Examination in April 2017. It excludes the independent site to the north, which is to be accessed from Hey Back Lane and is subject to a separate planning application. The Proposed Development is discussed further within section 2 of this report

1.3 This Scoping Report is submitted to Kirklees Council as a request for a Scoping Opinion under Regulation 15 of the Town and Country Planning (Environmental Impact Assessment) Regulations 2017 (the "EIA Regulations"). In accordance with Regulation 15, paragraph 2, this report contains:

- A plan sufficient to identify the land;
- A brief description of the nature and purpose of the development, including its location and technical capacity; and
- An explanation of the likely significant effects of the development on the environment.

Requirement for EIA

1.4 The EIA process is the mechanism by which development proposals are appraised in terms of environmental criteria, in addition to socio-economic, engineering and technical considerations. The Environmental Statement (ES) defines the context of the Proposed Development and examines the issues considered pertinent in order that decision-makers can understand the likely significant effects associated with a proposal.

1.5 The purpose of the EIA is to establish the nature of the development and the environment on which it is likely to take place to identify likely significant effects on the environment that may arise, by comparing the existing situation at the start of the work (baseline) with the situation once the Proposed Development are in place.

1.6 The EIA Regulations define 'EIA Development' (Regulation 2(1)), and stipulate that any proposed development falling within the description of a 'Schedule 2 development' within the meaning of the Regulations, will be subject to an EIA where such development is likely to have 'significant' effects on the environment by virtue of such factors as its nature, size or location.

1.7 The proposed urban development falls under the category of "Infrastructure Projects" and sub-category of "Urban Development" (Schedule 2, 10, (b)) as described in the Regulations. The applicable threshold above which EIA is more likely to be required is if the development includes more than 1ha of development which is not dwellinghouse development, or the overall area of development exceeds 5ha.

1.8 The Site extends to approximately 112 hectares (ha) and so the Proposed Development exceeds the screening thresholds of the EIA Regulations.

1.9 Given the nature of the Proposed Development in regard to the redevelopment of the Site, and the overall scale of development, an EIA is considered appropriate to test the likely significant effects of the Proposed Development. The applicant therefore proposes to undertake an EIA and to submit an ES in support of the forthcoming planning application.

Purpose of the Scoping Report

1.10 The process of identifying likely significant effects on the environment which should be addressed by the EIA is termed 'scoping'. The Applicant has undertaken a scoping exercise, the results of which are presented within this Scoping Report. The report is intended to inform Kirklees Council's adoption of a Scoping Opinion, which is requested alongside the submission of this report.

1.11 Regulation 15 of the EIA Regulations sets out the requirements for obtaining a Scoping Opinion from the relevant planning authority.

1.12 This Scoping Report sets out the framework within which the Environmental Statement will be produced and the topic areas and information that will be contained within the document. Statutory Consultees are invited to express their views on the proposed scope of the EIA, or suggest additional issues which may be considered to be of significance.

1.13 Section 2 of this report provides a site description and outlines the nature and purpose of the Proposed Development. Section 3 sets out the scope and structure of the ES and details those to be consulted. Section 4 provides details of the proposed EIA methodology to be used in assessing the Proposed Development. Sections 5 to 12 set out the key issues that will be addressed by the EIA.

2 Site Description and Development Proposals

Site Description

2.1 The Site is located to the east of the A653 Leeds Road dual carriageway, which is a strategic corridor between Dewsbury and Leeds. In the immediate vicinity of the Site, Leeds Road runs in a north-south direction, adjoining the A638 Wakefield Road and Junction 28 (the Tingley Interchange) of the M62 Motorway to the north. The A638 Wakefield Road links with the M1 Motorway Junction 40 to the east of the Site.

2.2 The Site lies within the Green Belt and covers an area of approximately 112 hectares, which is wholly within the administrative boundary of Kirklees Council.

2.3 The Site is part of the proposed mixed-use allocation MX1905 in the Publication Draft Kirklees Local Plan which was submitted for Examination in April 2017. It excludes the independent site to the north, which is to be accessed from Hey Back Lane and is subject to a separate planning application. To the east of the Site there is land predominantly in agricultural uses.

2.4 A Site Location Plan is provided at Appendix 1.

2.5 The Site is gently undulating, with two notable landscape features: a higher 'ridge' to the west of the centre, and a 'bowl-like' valley to the north, drained by the streams and ditches.

2.6 The Site does not contain any listed buildings, nor is it located within a Conservation Area. The nearest listed building is Haigh Hall (Grade II), located approximately 735m to the east of the Site

2.7 There are no statutory environmental designations on the Site, however the Site is adjacent to an area identified as a Local Wildlife Site which is part of the Wildlife Habitat Network and is designated as Ancient Woodland (Dogloitch Wood and Dum Wood to the east).

2.8 There are a number of Public Rights of Way which either pass through the site or lie in close proximity. These routes will be fully considered as part of the planning application.

2.9 The Site is not located within an Air Quality Management Area (AQMA).

2.10 The Site is located within Flood Zone 1 and is therefore at low risk of flooding. A water main and existing sewerage infrastructure crosses the Site which may need to be diverted, removed or altered.

Site Context

2.11 The surrounding area is characterised predominantly by agricultural land, with a mix of early and late 20th century bungalows and semi-detached properties fronting the main arterial routes.

2.12 The Site is part of the proposed mixed-use allocation MX1905 in the Publication Draft Kirklees Local Plan which was submitted for Examination in April 2017.

2.13 The vision for Kirklees is that by 2031, it will be a great place to live, work and invest in, delivered through an integrated approach to housing and employment. Development will

have taken place in a sustainable way by balancing economic, social and environmental priorities.

2.14 The Leeds City Region SEP sets out the spatial priority areas to maximise growth potential and ensure prosperity across the whole City Region.

2.15 The SEP identifies growth opportunities which have strategic significance to the whole of the City Region. This includes strategic employment and mixed-use sites. A total of five major development area proposals have been identified in the Leeds City Region, including land at Chidswell, Dewsbury ("the Site").

2.16 This Site presents a sustainable and substantial opportunity for new development in the Plan. The vision is to create a sustainable urban extension to Chidswell, with a strong sense of place and identity based on easily navigable walkable routes linking neighbourhoods, employment, community uses and open spaces.

2.17 A concept masterplan has been developed which sets out how the Site could be developed to accommodate the housing and employment requirements of the allocation. Details of the masterplan are set out below.

Proposed Development

2.18 The Proposed Development is for an outline planning application as follows:

"Outline Application (all matters reserved except access) for a mixed-use development of 1,354 dwellings, 35 hectares of employment development, a primary school, local centre, green space, access and other associated infrastructure."

2.19 The Proposed Development aims to include:

- The residential development will comprise an appropriate range and mix of housing to meet local needs and respond to market requirements;
- The employment space created will include a range of larger and smaller scale opportunities, providing the flexibility to respond to local and national requirements attracted by good accessibility to the M1 and M62 strategic road network;
- Promote a sustainable community with access to school facilities and a local centre on site to serve the new community and existing residents;
- Retention of key woodland blocks (Dum Wood and Dogloitch Wood) and promotion of green fingers throughout the site to promote walkable and cycle friendlyneighbourhoods with a hierarchy of easy to navigate routes connecting neighbourhoods, spaces and employment uses; and
- Provision of multiple vehicular access points to ensure effective connectivity with the strategic transport network for cars and public transport.

2.20 Table 2.1 below illustrates the approximate maximum parameters for development. It should be noted that the proposed figures are not fixed and are part of an evolving design, however are suitable for EIA scoping purposes.

Table 2.1: Proposed Uses, Floorspaces and Heights

Site Area	**Approximately 120 ha**
Uses and Area	• Approximate no. of dwellings – 1,535 • Density – 30-35 dwellings per hectare • Proposed Employment Floor Area – a maximum of 122,500 sqm

2.21 At this stage, construction is envisaged to commence in 2022, with the Proposed Development becoming operational in phases, with the first commencing in 2023.

2.22 The design process is being informed by landscape and ecological considerations in order to ensure the Proposed Development is sensitively designed and will appropriately relate to its surroundings.

2.23 Additional features of and activities related to the Proposed Development are expected to include:

- Significant land re-grading to create development platforms for buildings.
- Removal of existing trees and replanting of new trees with an expected overall neutral effect on tree numbers, and an aspiration to provide a net gain in tree numbers.
- Introduction of drainage infrastructure and potential sustainable urban drainage system (SUDS) features.
- Associated hard and soft landscaping.

2.24 The specific development parameters will be developed over the course of the design phase and informed by the EIA process. The developed design proposals will form part of the planning application once submitted.

3 Scope, Structure and Consultation

Scope

3.1 A scoping exercise has been carried out in order to determine the likely significant effects on the environment that may arise as a result from the Proposed Development. This process has enabled the team to determine which technical disciplines are pertinent to the Proposed Development and the scope of assessment required in order for any likely significant effects on the environment to be addressed as part of the EIA process.

3.2 This process has taken account of the proposed demolition activities, relevant planning policy, knowledge of the Site, and the professional opinion of the project team.

3.3 The information presented in the ES will be provided in accordance with Schedule 4 of the EIA Regulations and will include:

- A description of the development incorporating the information required by Schedule 4 para 1(a);
- A description of the reasonable alternatives studied (Schedule 4 para 2);
- A description of the baseline scenario and an outline of the evolution of the baseline without the Proposed Development (Schedule 4 para 3);
- A description of the aspects of the environment specified in Regulation 4(2) likely to be significantly affected by the Proposed Development;
- A description of the likely significant effects of the Proposed Development on the environment resulting from the matters specified in Schedule 4 para 5;
- A description of the forecasting methods or evidence used in assessing likely significant effects (Schedule 4 para 6);
- A description of the measures envisaged to prevent, reduce and where possible offset any significant adverse effects on the environment (Schedule 4 para 7);

3.4 As the planning application is to be submitted in outline form with all matters reserved except for access, the ES will be undertaken on a series of parameter plans. This will include a masterplan showing the overall development, and a series of parameter plans showing the main development area, drainage ponds, key landscape/ecology areas and building heights.

3.5 The introductory chapters of the ES will provide the following information:

- An introduction to the ES in a legislative and site specific context;
- Description of the Site and proposals;
- Alternatives considered and project design evolution;
- EIA methodology;
- ES structure; and
- Details of the EIA project team.

3.6 The geographical coverage of the EIA will be determined by a number of factors including:

- The physical extent of work;
- The nature of the baseline environment, including the location of sensitive receptors;
- The distance over which effects will be significant; and
- The presence and type of "pathways" along which impacts may be spread.

Environmental Disciplines Scoped Out

3.7 It is considered that the following disciplines will not give rise to likely significant effects on the environment and would therefore not require inclusion in the Environmental Statement. An explanation for each discipline is given below.

Wind Microclimate

3.8 The Proposed Development will be low-rise and does not propose any tall buildings. The proposed built topography of the Site will not be of a scale that would give rise to significant impacts on wind microclimate. Wind microclimate will be given appropriate consideration during the design development and landscape design. This topic is therefore scoped out of the ES as significant effects are not likely.

Electrical Interference

3.9 The proposed built topography of the Site will not be of a scale that would give rise to impacts on televisual or telephonic transmissions. This topic is therefore scoped out of the ES as significant effects are not likely.

Daylight, Sunlight, Overshadowing, Light Pollution and Solar Glare

3.10 The proposed built topography of the Site is unlikely to be of a scale that would give rise to significant effects on local receptors in terms of daylight, sunlight, light pollution and solar glare.

3.11 The proposed external lighting scheme will aim to provide a sensitive and subtle solution, respecting local and national legislation and good guidance practice documents. The proposed external lighting scheme will also follow the principles established by the International Dark Sky Association (IDSA) to limit skyward light glow; the IDSA recommendations provides more descriptive advice on luminaire selections to ensure a low impact solution in relation to both distance views of the Site and views from within the Site.

3.12 The proposed lighting scheme will adhere to the following design and technical principles:

Luminaire Selection Design Points:

(1) Utilise 'full-cut' optic luminaires and ensure tilt angles are minimised with optimal mounting heights.

(2) Utilise luminaires with fully shielded optics (pointing downward) to minimise glare and light trespass.

Lighting Design Implementation Points:

(3) Where lighting is not required for access or safety at night, lighting will be turned off and controllable via digital timeclock, the Building Control System (BMS) and/or photocell control.

(4) Where lighting is not able to be turned off entirely, dimming will be considered during times of low area or space use.

(5) Lighting installations will be designed to be no brighter than necessary, i.e. designed to the minimum recommended illumination levels.

(6) Lighting to be limited to the elements and areas that needs illumination for sports use, site maintenance, safety and personal security.

(7) Switching to ensure lighting is only 'on' when needed; implementing lighting controls such as BMS, photocells and timeclock devices and adapting lighting to actual demand only. This is a key in terms of the site's relationship with its surroundings and respecting the intrinsic dark sky.

(8) Minimise blue spectrum light emissions to be more conducive to scientific observations of the dark sky and providing a better environment for light sensitive species.

3.13 While these aspects help to ensure light use is reduced, at times lighting may not be fully removed from the equation. Where this occurs,

3.14 lighting will be given consideration through the design process and it is expected that a detailed lighting scheme will be secured by planning condition.

3.15 Daylight, sunlight, light pollution and solar glare are therefore scoped out of the ES as significant effects are not likely.

Arboriculture

3.16 There are a number of trees present on the Site. Potential impacts on trees will be carefully considered throughout the design process, in order to ensure that the Proposed Development sensitively relates to the existing trees. The ecological and landscape chapters of the ES will give proper consideration to any proposed changes in tree cover.

3.17 The design process will take a landscape-led approach whereby impacts on trees will be avoided, minimised and mitigated during the design process. An arboricultural survey will be undertaken to inform the design process and the ecological and landscape assessments. This survey will form an appendix to the ecological ES chapter.

3.18 It is considered that significant effects on trees, outside of the ecological and landscape impacts to be assessed within the respective ES chapters, are not likely to arise as a result of the Proposed Development, however the potential for ecological and landscape impacts will be given proper consideration. Therefore, a standalone arboriculture assessment is scoped out of the ES. Notwithstanding this, an Arboricultural Assessment to BS5837:2012 will be provided to accompany the planning application.

Human Health

3.19 The Proposed Development is not anticipated to have any likely significant effects in relation to human health during either the construction or operational phases.

3.20 During the demolition and construction phase, there are likely to be some temporary short-term impacts in relation to the generation of air quality and noise and vibration impacts. These are an unavoidable aspect of demolition and construction works and are controlled through legislation governing pollution control. Construction phase impacts will be mitigated to acceptable levels by the implementation of a Construction Environmental Management Plan (CEMP), which will include measures to minimise any impacts on both on-site workers and local residents. Impacts on air quality and noise and vibration will be assessed within the ES, and any additional specific, non-standard mitigation measures identified as a result of these assessments will be incorporated into the CEMP. It is expected that the CEMP would form a condition of any planning permission.

3.21 In summary, the potential for pollution and other environmental effects with the potential to impact on human health will be accounted for within other ES chapters and assessments, and

within the planning application submission documents. The Proposed Development is not of a type or scale which is likely to give rise to significant effects on human health. This topic is therefore scoped out of the ES.

Climate Change

3.22 The construction and operation of the Proposed Development would inherently give rise to some greenhouse gas emissions, however these are not considered to be significant and would not contribute significantly to climate change.

3.23 Sustainability measures will inform the design process throughout its development, including climate change mitigation and energy usage and appropriate consideration will be given to opportunities to reduce the climate impacts of the Proposed Development.

3.24 Neither the Site nor the Proposed Development are particularly vulnerable to climate change. The Site is located within flood zone 1 and the Flood Risk Assessment that will support the Water Resources Chapter of the ES will fully consider the impacts of climate change. Where appropriate, the Proposed Development's effects on climate change and climatic factors for individual topics will be considered within the relevant chapters of the ES.

3.25 Overall, it is not considered that the Proposed Development will result in any likely significant effects relating to climate change and this topic is therefore scoped out of the ES.

Odour

3.26 Details of odour abatement techniques are required to accompany applications for the use of premises for purposes within Use Classes A3 (i.e. Restaurants and cafes – use for the sale of food and drink for consumption on the premises), A4 (i.e. Drinking establishments – use as a public house, wine-bar or other drinking establishment), A5 (i.e. Hot food takeaways – use for the sale of hot food for consumption off the premises),B1 (general business) and B2 (general industrial).

3.27 The Proposed Development will include commercial development such as B1 uses. It is not considered that this will result in any likely significant effects relating to odour. Notwithstanding this, an Odour Assessment will be submitted in support of the planning application, but it is not considered necessary to include this topic within the ES.

Scoping Summary

3.28 Table 3.1 provides a summary of the scoping exercise undertaken and what disciplines will be considered within the ES. It also identifies what supplementary technical reports will be prepared and submitted as standalone documents in support of the application.

Table 3.1: Environmental Statement Scoping Summary

Topic	Scoped In / Scoped Out	Consultant
Socio-Economic	✓	Deloitte
Traffic and Transportation	✓	Pell Frischmann
Ecology and Nature Conservation	✓	Brooks Ecology
Landscape and Visual Impact	✓	Re-Form Landscape
Archaeology and Built Heritage	✓	Cotswold Archaeology
Noise and Vibration	✓	Delta Simons
Air Quality	✓	Delta Simons
Flood Risk and Water Environment	✓	Patrick Parsons
Ground Conditions	✓	Patrick Parsons
Type 1 Cumulative Effects	✓	Deloitte Real Estate
Type 2 Cumulative Effects	✓	Consultant Team (contained within each technical ES chapter)
Wind Microclimate	*X*	n/a
Electrical Interference	*X*	n/a
Daylight, Sunlight, Overshadowing, Light Pollution and Solar Glare	*X*	n/a
Arboriculture	*X*	n/a
Agricultural Circumstances and Soil	*X*	n/a
Human Health	*X*	n/a
Climate Change	*X*	n/a
Odour Assessment	*X*	n/a

Cumulative Effects Assessment

3.29 An assessment of both Type 1 and Type 2 cumulative effects will be undertaken, as discussed further in Section 4 of this report.

3.30 Type 1 cumulative effects will be assessed within a summary chapter at the end of the ES, which draws upon the residual effects of the Proposed Development as identified in the ES. This assessment will be undertaken in accordance with relevant guidance.

3.31 Type 2 cumulative effects will be assessed within the individual technical chapters of the ES.

3.32 To inform the Type 2 cumulative effects assessment, a search of committed developments has been undertaken. There is no agreed / standard threshold for how far the assessment should go and therefore the assessment is based on professional judgement. On this basis it is considered to appropriate to assess the Proposed Development in the context of the other proposed allocations within the vicinity which are:

- The remainder of site allocation MX1905 (which consists of a small parcel of land accessed of Heybeck Lane);
- Site Allocation H559 (land to the east of Leeds Road, Chidswell);
- Site Allocation MX3394 (Leeds House Farm, Leeds Road, Dewsbury).

3.33 The applicant seeks the agreement of the Local Planning Authority (LPA) on the scope of committed developments.

Consultation

3.34 The following statutory consultees are expected to be consulted through the EIA Scoping process:

- Kirklees Council (KC);
- Environment Agency (EA);
- Highways England;
- Historic England;
- Coal Authority; and
- Natural England.

3.35 A process of stakeholder consultation has already commenced with regard to the Proposed Development. Members of the project team have met with senior officers from the LPA to discuss the Proposed Development, including the likely scope of the EIA.

3.36 Further meetings will take place with KC, which will include additional consultation with the Planning, Environmental Health and with Highways officers.

3.37 Pre-application consultation will take place with local residents, stakeholders, Councillors, adjoining owners and occupiers.

3.38 A Statement of Consultation will be submitted with the application and will provide further detail on consultation undertaken.

4 EIA Methodology

4.1 The EIA will assess both the construction and operational phases of the Proposed Development.

4.2 The ES is anticipated to comprise two volumes, the first of which will set out the findings with respect to each of the environmental disciplines that have been examined as part of the EIA. Volume 2 will include all the supporting documents and technical appendices relating to the chapters. A Non-Technical Summary (NTS) will be produced and form a standalone document.

4.3 Each ES chapter will follow the headings set out below to ensure the final document is transparent, consistent and accessible.

- Introduction;
- Policy Context;
- Assessment Methodology and Significance Criteria;
- Baseline Conditions;
- Identification and Evaluation of Key Effects;
- Mitigation Measures;
- Cumulative Effects;
- Residual Effects; and
- Summary.

4.4 Each chapter sub-heading is explained in further detail below.

Introduction

4.5 This section will introduce the assessment discipline and the purpose for which it is being undertaken.

Policy Context

4.6 This section will include a summary of national, regional and local policies of relevance to the environmental discipline and assessment. Relevant legislation will be summarised where applicable.

Assessment Methodology and Significance Criteria

4.7 This section will provide an explanation of methods used in undertaking the technical study with reference to published standards, guidelines and best practice. The application of significance criteria will also be discussed.

4.8 It will also outline any limitations, assumptions, or difficulties encountered in compiling the required information.

Baseline Conditions

4.9 This will include a description of the environment as it is currently and as it is expected to change were the project not to proceed (i.e. 'do-nothing' scenario). The method used to obtain this information will be clearly identified. Baseline data will be collected in such a way that the importance of the particular subject area to be affected can be placed in its context and surroundings so that the effects of the proposed changes can be predicted.

Identification and Evaluation of Likely Significant Effects

4.10 This section will identify the likely significant effects on the environment resulting from the Proposed Development.

4.11 The significance of an environmental effect is determined by the interaction of magnitude and sensitivity, whereby the effects can be positive or negative. The criteria to be used in carrying out this process are detailed below.

Prediction of Impact Magnitude

4.12 The methodology for determining the scale or magnitude of change caused by the impact is set out below.

Table 4.1: Methodology for Assessing Magnitude of Change

Magnitude of Change	Criteria for assessing magnitude of change caused by an impact
Major	Total loss or major/substantial alteration to key elements/features of the baseline (pre-development) conditions such that the post development character/composition/attributes will be fundamentally changed.
Moderate	Loss or alteration to one or more key elements/features of the baseline conditions such that post development character/composition/attributes of the baseline will be materially changed.
Minor	A minor shift away from baseline conditions. Change arising from the loss/alteration will be discernible/detectable but not material. The underlying character/composition/attributes of the baseline condition will be similar to the pre-development circumstances/situation.
Negligible	Very little change from baseline conditions. Change barely distinguishable, approximating to a 'no change' situation.

Prediction of Receptor Sensitivity

4.13 The sensitivity of a receptor is based on the relative importance of the receptor using the scale set out below.

Table 4.2: Methodology for Determining Sensitivity

Sensitivity	Examples of receptor
High	The receptor/resource has little ability to absorb change without fundamentally altering its present character, or is of international or national importance.
Moderate	The receptor/resource has moderate capacity to absorb change without significantly altering its present character, or is of high importance.
Low	The receptor/resource is tolerant of change without detriment to its character, is of low or local importance.

Assessment of Effect Significance

4.14 Effect significance will be calculated using the matrix in Table 4.3. This illustrates the interaction between impact magnitude and receptor sensitivity.

Table 4.3: Effect Significance Matrix

Magnitude	Sensitivity		
	High	**Moderate**	**Low**
Major	Major Adverse/Beneficial	Major - Moderate Adverse/Beneficial	Moderate - Minor Adverse/Beneficial
Moderate	Major - Moderate Adverse/Beneficial	Moderate – Minor Adverse/Beneficial	Minor Adverse/Beneficial
Minor	Moderate – Minor Adverse/Beneficial	Minor Adverse/Beneficial	Minor - Negligible
Negligible	Negligible	Negligible	Negligible

4.15 All of the assessments will be carried out in accordance with the methodology set out above in order to determine the significance of effects. Should effects need to be determined differently, for example due to requirements of guidance or similar, then this will be clearly set out within the relevant ES chapter.

Mitigation Measures

4.16 Adverse effects will be considered for mitigation and specific mitigation measures put forward, where practicable. Mitigation measures considered may include modification of the project, compensation and the provision of alternative solutions as well as pollution control. The extent of the mitigation measures and how these will be effective will be discussed. Where the effectiveness is uncertain or depends upon assumptions about operating procedures, data will be introduced to justify the acceptance of these assumptions.

4.17 The approach to mitigation will follow best practice guidance, which suggests a hierarchical approach. The UNEP EIA Training Resource Manual (2002) advises that impacts should ideally be:

i. Avoided; if not

ii. Minimised; and/or

iii. Compensated.

4.18 Three 'types' of mitigation are characterised in IEMA's Special Report – The State of Environmental Impact Assessment Practice in the UK (2011):

- EIA influence at design stage;
- Standard construction practices for minimising effects; and
- Follow-up actions for implementation post-consent.

4.19 Clear details of when and how the mitigation measures were carried out, or will be carried out, are to be given within the Environmental Statement. When certainty of impact magnitude and/or effectiveness of mitigation over time exists, monitoring programmes will be proposed to enable subsequent adjustment of mitigation measures, as necessary.

4.20 The opportunity for enhancement measures will also be considered where appropriate.

Cumulative Effects

4.21 Two types of cumulative effect will be assessed:

- Type 1 - Cumulative effects are the interactions between multiple effects of the demolition and redevelopment works on a single receptor.
- Type 2 - Cumulative effects are those that arise from incremental changes caused by other past, present or reasonably foreseeable actions together with the demolition and redevelopment works.

4.22 The cumulative effects of the Proposed Development and the identified committed developments will be assessed.

Residual Effects

4.23 The residual effects, i.e. the effects of the Proposed Development assuming implementation of proposed mitigation, will be determined. The residual effects represent the overall likely significant effect of the Proposed Development on the environment having taken account of practicable/available mitigation measures.

Environmental Statement Chapters

4.24 The following sections of this report are arranged in accordance with the proposed ES chapters, and provide a summary of the content of the chapter, and an overview of the proposed methodology and scope of the assessments. Where relevant, the assumptions of the assessment are described. Current relevant legislation or recognised guidance for individual assessments will be adhered to as appropriate.

5 Socio-Economic Impact

Introduction

5.1 This section of the Scoping Report has been prepared by Deloitte. The proposed ES chapter will assess the likely significant effects of the Proposed Development on the environment with respect to socio-economic matters.

5.2 The assessment will consider direct and indirect construction phase (temporary) and operational phase (permanent) effects on the local and regional environment.

5.3 The study areas within this assessment are, broadly, the 'site', 'local-sub-regional' and 'regional' scales. Data used in the assessment will be based upon publicly available information, relating to various spatial scales for the local ward, district, region, and nation. These scales will be used as a guide within the assessment. Different study areas will be used for the assessment of individual socio-economic impacts, and the study area for each individual assessment will be based upon professional judgement and experience of similar projects.

5.4 In defining study areas, consideration will be given to advice set out by English Partnerships in established guidance[1].

5.5 Socio-economic effects of the Proposed Development, which will be assessed within the ES chapter, are anticipated to include the following topics:

- Population: impact of development on local population;
- Local expenditure: changes in local retail and leisure spending and economic impacts of development;
- Employment and training: changes in infrastructure to support education and training opportunities;
- Leisure, recreation, amenity and sport: changes in the provision of infrastructure for leisure, recreation, amenity and sport; and
- Access, rights of way and common land: impact of development on access routes, public rights of way (PROW), and changes in the provision of common land.

Baseline Conditions

5.6 An appraisal of the baseline conditions in relation to the Site will be undertaken in order to understand the key socio-economic characteristics of the Site and the surrounding area.

5.7 Baseline data will be gathered from a range of publicly available sources of information, including Census data, Office for National Statistics data, and data obtained from the local authority or other relevant sources.

[1] English Partnerships (2008), Additionality Guide – A Standard Approach to Assessing the Additional Impacts of Interventions (Third Edition), https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/191511/Additionality_Guide_0.pdf

Method of Assessment

5.8 Baseline data will be gathered to inform the socio-economic characteristics of the study area.

5.9 The assessment will utilise both quantitative and qualitative methods to consider baseline characteristics and likely impacts. Regard will be given to policy guidance and strategies within the wider area.

5.10 There are no specific technical criteria to classify the significance of socio-economic effects. Therefore, reasoned professional judgement will be applied to consider effects in terms of their overall impact on the study area at various scales.

Potential Effects

5.11 Key issues for consideration include:

- Direct impacts on the local and regional population during the construction and operation of the Proposed Development.
- Direct and indirect impacts on the local economy such as increased local spending.
- Direct and indirect potential impacts of the Proposed Development on employment and training opportunities.
- Direct impacts the Proposed Development may have on the existing local community such as changes impacts on population and changes in the availability of facilities for recreation.
- Direct impacts on the availability, accessibility and quality of access routes, public rights of way, and common land.

Summary of Assessment Scope

5.12 Table 5.1 below summarises the potential socio-economic impacts which have been scoped in to be assessed within the ES.

Table 5.1: Summary of Socio-Economic Impact Assessment Scope

Topic	Impact	Potential Effect
Population	Changes to temporary and permanent population within the area	Potential effects on local population
	Changes in employment and recreational opportunities available to local population	
Economic Impact	Changes in local expenditure during construction and operational phase	Potential effects on local economy
	Contribution of development to local, profile of Chidswell and Dewsbury	Supply chain linkages creating additional economic benefits
Employment and Training	Increased employment opportunities during construction and operation	Creation of employment during construction
	Provision of opportunities for staff for training and development	Short and long term increases in operational employment
Leisure, Recreation, Amenity and Sport	Changes in the availability, type and range of facilities available for leisure and recreation	Potential effects on local population
Access, Rights of Way and Common Land	Changes in the availability, accessibility and quality of access routes, public rights of way, and common land	Potential temporary and permanent effects on users of existing and proposed routes and land

6 Traffic and Transportation

Introduction

6.1 This section of the Scoping Report has been prepared by Pell Frischmann. The proposed ES chapter will assess the likely significant effects of the Proposed Development on the environment with respect to traffic and transportation.

6.2 Due to the temporal differences in peak uses, it is considered appropriate to undertake an assessment of the associated traffic and transportation impacts of the Proposed Development.

Baseline Conditions

Local Highway Network and Strategic Transport Corridors

6.3 The A653 Leeds Road is a two-lane dual carriageway providing access between Leeds and the M62 Junction 28 (Tingley Interchange) to the north and the town of Dewsbury to the south. The site is fronted by residential properties and also has a number of small farm accesses, including access to Lees House Farm which is adjacent to the Site.

6.4 South of the Site, Leeds Road becomes a single carriageway road with a single lane of traffic in each direction. It continues to be fronted by residential properties, although various local shops and facilities are provided between the site and Dewsbury town centre. As Leeds Road enters Dewsbury town centre, it meets the Dewsbury Ring Road which is a dual carriageway with limited active frontage.

6.5 The B6128 Owl Lane is a single carriageway road with a single lane of traffic in each direction. It connects the A653 Leeds Road with the A638 Wakefield Road. The junction of Leeds Road and Owl Lane a signalised crossroads.

6.6 The Leeds City Regional Transport Strategy (RTS) (October 2009) as well as the KC Core Strategy (CS) Development Plan Document (DPD) (p. 99 'Core networks') (2012) identify strategic transport corridors. These corridors, which include road and rail routes, connect Leeds to the north with Bradford, Wakefield, Halifax and the main towns within Kirklees District, including Dewsbury and Huddersfield, with the Highways England (HE) Strategic Road Network (SRN).

6.7 The Site is situated within the Leeds – North Kirklees – Huddersfield – Manchester transport corridor, which is identified as the main strategic corridor in Kirklees District as it links the major towns with the adjoining regional centres. This corridor comprises several transport routes within Kirklees including strategic roads and the TransPennine Railway. The proposals for development in the KC CS have as far as possible been linked with this main corridor, both to take advantage of the highest quality transport links in the District and to ensure new developments are well connected and sustainable.

Local Bus Services

6.8 The Site is situated within a pivotal point on the local bus network, being served by a large number of bus routes providing convenient key links to major employment areas and town centres elsewhere in the District and beyond. There are various existing bus stops located within close proximity to the Site, including at the northern, western and southern edges of the Site, with bus stops situated along the A653 Leeds Road, Heybeck Lane and Chidswell Lane respectively.

6.9 The northern part of the Site is served by local bus routes 117, 205, 212 and 217 in both directions along Heybeck Lane. Routes 117 and 217 connect Wakefield with Leeds via Chidswell; route 205 connects Dewsbury with Pudsey; and route 212 connects Wakefield with Batley, to the west, providing a direct bus service between the Masterplan site and Batley Rail Station.

6.10 The Site's western edge, along Leeds Road, has three bus stops. These are served by routes 117, 202, 203, 205 and 217; routes 202 and 203 run from Huddersfield to Leeds via Dewsbury, all major nearby employment centres.

6.11 The Site's southern edge is also served by route 205 and additionally routes 199, 120 and ML9. Route ML9 connects Chidswell with Dewsbury town centre by five buses a day (Monday to Saturday), once an hour between 10:00 and 14:00 hours, offering a 'hail and ride' service for most of the route. Routes 199 and 120 link Wakefield to Batley via Chidswell.

Mainline Rail Services

6.12 There are two mainline railway stations located within relatively close proximity to the Site. Batley Railway Station is located approximately 3km to the west and Dewsbury Railway Station is located approximately 4km to the south-west. Both stations can be accessed via existing bus routes and bus stops are provided close to both stations; Dewsbury Station also has a dedicated public transport interchange facility located directly outside the station.

Walking

6.13 According to the Department for Transport (DfT), walking is considered to be the most important mode of travel at the local level with the greatest potential to replace short car trips, particularly under 2 kilometres. Additionally, the Chartered Institution of Highways & Transportation (CIHT) Guidance 'Planning for Walking' also states that, *"Across Britain about 80 per cent of journeys shorter than 1 mile are made wholly on foot"*. This would indicate that a large percentage of the trips within the Site itself and within a 1 mile radius of the Site would be made on foot.

6.14 The majority of roads surrounding the Site, including Leeds Road, Heybeck Lane, Chidswell Lane and Windsor Road, have footways provided on both sides of the carriageway to facilitate pedestrian movement.

6.15 Along the A653 Leeds Road, good quality wide footways are provided on both sides of the carriageway. Pedestrian crossing facilities are also provided at various junctions, to provide pedestrian connectivity. Leeds Road is well lit and is considered safe for pedestrians.

6.16 Heybeck Lane also provides good quality wide footways on both sides of the carriageway. It is also well lit making this a safe walking environment for pedestrians.

6.17 Chidswell Lane provides good quality footways on both sides of the carriageway, which are considered sufficiently wide for high volumes of pedestrian traffic and are also well lit.

Cycling

6.18 According to the DfT, cycling has the potential to replace short car trips, particularly those under 5km. The 5km cycling catchment from the site includes Dewsbury, Batley, Morley, East Ardsley, Ossett and parts of Wakefield.

6.19 Appropriate cycling provision is available in the local area with cycle lanes being provided on Leeds Road in order to promote cycling.

6.20 In addition, towns such as Wakefield, Horbury, Morley and Middleton can all be reached by bicycle within 30 minutes via existing safe cycle routes and Public Rights of Way (PRoWs).

6.21 The Site is surrounded by, and connected to, various destinations via several National Cycle Network (NCN) routes. NCN route 69 connects Dewsbury with Ravensthorpe and, in turn via NCN route 66, with Huddersfield and Bradford. NCN route 69 also connects Dewsbury with Ossett and, in turn via NBCN route 699, to the 'Wakefield Wheel'.

6.22 To the north of the Site, there are several local traffic-free cycle routes that link Tingley to Beeston and Middleton to Leeds city centre.

Method of Assessment

6.23 A Transport Assessment will be submitted with the application as part of the ES. This will include a review of the existing situation, an assessment of accessibility by sustainable modes of travel, details of traffic forecasting and highway impact and a review of relevant transport planning policy.

6.24 The traffic and transport impact of the Proposed Development at the Masterplan site will be assed in line with guidance contained within the DfT publication 'Guidance on Transport Assessment' (GTA) (March 2007) and contained within The Institute of Environmental Assessment (now IEMA) 'Guidelines for the Environmental Assessment of Road Traffic'.

6.25 Scoping discussions between Pell Frischmann, on behalf of the Commissioners, and officers from KC and Highways England (HE) (in respect of the SRN) will be undertaken prior to submission of the Transport Assessment (TA) that will accompany the outline planning application.

6.26 It is confirmed that a TA and Framework Travel Plan (FTP) will be prepared to accompany the outline planning application submission.

6.27 The proposed elements to be included within the TA for the outline planning application are as follows:

- Review of policy and assessment of development in accordance with policy;
- Review of sustainable travel modes and any required improvements to support the development;
- Review of public transport availability and any required improvements to support the development;
- Traffic data collection (existing traffic);
- Trip generation;
- Development parking provision;
- Assessment of traffic impacts at the site access junctions and any required highway improvements;
- Assessment of traffic impacts at off-site junctions (scope to be agreed with KC and HE officers) and any required highway improvements; and
- Development of site access arrangements.

6.28 The extent of transport impact will be determined using pre-defined significance criteria for each mode of travel. These criteria will be based on the net change in journeys as a result of the Proposed Development of the Site and any infrastructure improvements, to be delivered as part of the Proposed Development. The significance criteria will establish the magnitude of any beneficial or adverse effects the Proposed Development will have on the transport network.

6.29 The following topics will be assessed for the construction and operational phases:

- Driver severance and delay;
- Comprehensive development infrastructure;
- Pedestrian severance and delay;
- Pedestrian amenity;
- Road traffic accidents and safety;
- Hazardous and dangerous loads; and
- Dust and dirt.

Summary of Assessment Scope

6.30 Table 6.1 summarises the transport and access effects to be included for detailed assessment in the Environmental Statement (TS):

Table 6.1: Transport and Access Effects

Receptor	Effects	Scoped In
Public transport users	Increase in public transport service trips	✓
Highway network users	Change in the number of vehicle trips, including HGVs	✓
Users of local cycle/ pedestrian network	Increase in cycle and pedestrian movements	✓

7 Ecology and Nature Conservation

Introduction

7.1 This section of the Scoping Report has been prepared by Brooks Ecological Ltd. The proposed ES chapter will assess effects on ecology and nature conservation. An Ecological Impact Assessment (EcIA) will be undertaken with reference to the Ecological Impact Assessment guidance published by the Chartered Institute of Ecology and Environmental Management (CIEEM).

7.2 The EcIA will include a summary of the current ecological baseline conditions within the Site and assess the likely significant effects on the Proposed Development on Important Ecological Features (IEFs) such as designated sites, habitats and species populations. Where 'significant' effects cannot be avoided through inherent design, the EcIA will recommend additional mitigation and/or compensation measures.

Baseline Conditions

7.3 The Site's baseline has been established through a range of detailed ecological studies, carried out in 2016 and ongoing throughout 2018. Those completed and ongoing include:

- Extended Phase 1 Habitat Survey – December 2016 (WYG Ltd.);
- Habitat Suitability Index Assessment for Great Crested Newt & Report – March 2018;
- Barn Owl Scoping Assessment – April 2018;
- Badger Assessment - April 2018;
- Bat Roost Suitability Assessment of Trees – April 2018;
- Water Vole Assessment – Interim Report – June 2018;
- Hedgerow Assessment – July 2018;
- Breeding Bird Survey – in write up;
- Bat Activity Survey – ongoing;
- Reptile Survey – ongoing; and
- Bat Roost Suitability Assessment of Buildings – ongoing.

Habitats

7.4 The Site encompasses a collection of large arable fields, enclosed by a mix of post-and-wire fences and a disjointed network of typical field hedgerows. A small number of mature trees are scattered along the field boundaries and within hedgerows, and two large woodland blocks (Dunn Wood & Dogloitch Wood) abut the eastern boundary. Two smaller woodland blocks (recently planted as screens) are present along the western boundary and a small unnamed watercourse (bordered by mature trees and scrub) crosses the northern half of the Site, passing roughly west to east. Two further watercourses pass close to the Site, one along the southern edge of Dogloitch Wood and one along the southern Site boundary. All three water courses eventually connect offsite to the east, where they continue in a south-easterly direction within a small wooded valley.

7.5 A detailed assessment of Hedgerows has identified three short sections of hedge that would meet the threshold for 'Important' status under the Hedgerow Regulations 1997.

Protected Species

7.6 Surveys have concluded the likely absence of great crested newt, barn owl, and badger on Site, with ongoing surveys for water vole and reptiles, finding no evidence of their presence thus far. Bat activity surveys have so far recorded relativity low levels of bat activity, with that found being focussed along the central wooded watercourse. Breeding bird surveys have identified a typical assemblage of farmland birds, including a number of red and amber list species, many of which would be displaced by development.

Invasive Species

7.7 Himalayan balsam is recorded in abundance throughout the Site, especially along the central watercourse, hedgerow ditches and field margins.

Designated Sites

7.8 There are no statutory designated sites within the Ecological Zone of Influence (EZoI).

7.9 Nine non-statutory designated sites fall within 2km of the Site boundary, two of which are considered to fall within the Shite's EZoI. These are Dunn Wood and Dogloitch Wood Local Wildlife Site's (LWSs) and Sites of Wildlife Significance (SWS); both border the Site's eastern boundary.

Screening - Likely Environmental Effects

7.1 Proposals to develop the Site have the potential to impact significantly on a limited range of notable / protected species (bats and nesting birds), Habitats of Principal Importance (flowing water, broad leaved woodland and hedgerow) and Non-statutory Designations (Dunn wood and Dogloitch Wood LWSs). There is also a risk of further spreading Invasive Non-Native Species.

7.2 During demolition and construction, direct impacts on priority habitats and non-statutory sites would include their damage or loss; whilst indirect impacts could include pollution. These risks could extend through the Operational Phase.

7.3 For notable or protected species, impacts from demolition and construction activities could include killing, injuring and disturbing individuals, displacement of individuals/ populations through loss of habitat and severance of commuting routes. These risks could extend through the Operational Phase.

7.4 In the absence of mitigation, the development proposed could result in significant negative effects on the Site's Ecological Interest and as such, this topic should be scoped in.

Scoping - Key Issues for Consideration within the ES

7.5 The Key Issues to be considered within the Ecology ES Chapter are the impacts of development on the following Habitats; Important Hedgerows and Flowing water, and Noteable /Protected Species; Bats and Breeding birds. Impacts on Non-Stautory Designated Sites and Invasive Non-Native Species will also need to be considered. Each of these will be taken through the ES Chapter as Valued Receptors.

7.6 Cumulative Effects of adjacent development, chiefly the proposed residential development to the south, will be considered.

Method of Assessment

Establishing the baseline

7.7 The first stage of the assessment is to establish the baseline conditions for the Site and the surrounding area, which will be completed throughout 2018 as described above.

Consultation

7.8 The following statutory and non-statutory consultees will be consulted as part of the EcIA process (this list may be added to as species interests/sensitivities emerge):

- Natural England;
- Kirklees Council Ecology Officer; and
- Local wildlife groups where applicable.

7.9 Early and regular consultation is seen as an integral part of the EcIA process.

Assessment of Effects

7.10 The identification and evaluation of Important Ecological Features (IEFs) for the purposes of Ecological Impact Assessment, and the assessment of significant adverse or beneficial effects on IEFs, will be undertaken with reference to the Chartered Institute of Ecology and Environmental Management (CIEEM) Guidelines, Second Edition, January 2016.

7.11 The assessment of construction and operational effects on IEFs will be undertaken both before and after consideration of additional mitigation measures, the latter represents the assessment of residual effects, but including the inherent measures incorporated into the Proposed Development e.g. retention of LWS, hedgerows and trees. In addition, the potential for cumulative impacts to arise from the in-combination effects with other development proposals will be assessed.

Summary of Assessment Scope

7.12 Reference will be made to the Chartered Institute of Ecology and Environmental Management's (CIEEM) Guidelines for Ecological Impact Assessment in the UK and Ireland – Terrestrial, Freshwater and Coastal, Second Edition (2016). These guidelines have become a standard point of reference for Ecological Impact Assessment methodologies.

Mitigation Measures

7.13 Mitigation measures which may be appropriate and proportionate for this scheme and which will avoid 'significant harm to biodiversity' (in planning policy terms), avoid significant adverse effects (in EIA terms) and deliver a net biodiversity gain (in planning policy terms), may include (but not limited to):

- Retention of hedgerows and scrub/tree lines;
- Installation of new bat and bird boxes, and log pile hibernaculae (amphibians and reptiles);
- Incorporating biodiversity into building design including green roofs and walls:
- Design of new SuDs lagoons to provide biodiversity opportunities for wildlife, including variable shelf profile to provide different water depths and planting where appropriate/necessary with aquatic/emergent plants;
- Appropriate seeding of new SuDs swales and areas of POS with a range of native grass seed mixes according to variations in anticipated wetness and topography; and
- Appropriate management of retained and created habitats in perpetuity securing their longer-term future.

7.14 The potential for mitigation such as the above will be given careful consideration through the design process to ensure the Proposed Development is sensitive to ecology and nature conservation.

8 Landscape and Visual Impact

Introduction

8.1 This section of the Scoping Report has been prepared by Re-Form. An assessment of the potential landscape and visual effects resulting from the construction and operation of the Proposed Development will be set out in the ES.

Baseline Conditions

8.2 The following baseline conditions are of relevance:

- The Site is well defined within the wider landscape due to the effect of topography, intervening vegetation and surrounding development.
- The site is an area of agricultural land on the edge of Dewsbury, which lies in close proximity to housing, and major road infrastructure including local B-roads and the M1 motorway;
- Beyond the Site, lit areas include surrounding residential areas, local roads and the M1 corridor;
- The area does not incorporate areas of landscape value and quality at a national scale (National Park/ Areas of Outstanding Natural beauty).

8.3 The Site lies within Landscape Character Area LCA E8: Batley – Dewsbury Rural Fringes. The proposals will result in changes to the landscape character of the site and surrounding area. Though the emerging Local Plan no longer designates the Site as within Green Belt, the proposals are likely to bring about change to the sense of 'openness' of the landscape between existing settlements.

8.4 With the introduction of the 2017 EIA Regulations, applicants can now set out plain and uncontroversial mitigation measures that could be included when considering the likely significant effects of a development.

8.5 Taking the above issues into consideration, Landscape Assessment has been scoped into the ES.

8.6 The Site lies in close proximity to residential areas, local roads and a number of Public Rights of Way (PROW). Several PROWs cross the Site. A number of visual receptors are likely to experience significant changes as a result of the Development. Visual Assessment has, therefore, been scoped into the ES.

Assessment Methodology

8.7 The assessment of visual effects resulting from the construction and operation of the Proposed Development would be undertaken in accordance with Landscape Institute and Institute of Environmental Management and Assessment, 'Guidelines for Landscape and Visual Impact Assessment' (Third Edition, 2013).

8.8 The assessment will:

- Define the study area for the Site, identifying key views to be used for the visual impact assessment;
- Assess the susceptibility to change of the visual receptors (the receiving environment);
- Assess the magnitude of visual effects;
- Assess the significance of visual effects;
- Identify requirements of any mitigation measures.

8.9 Assessments will be made in the baseline year 2018, during construction; on completion; in the winter without the benefit of effective new planting; and 15 years thereafter, in summer, with the benefit of effective planting mitigation.

8.10 The study area, assessment methodology and the list of representative viewpoints for assessment would be agreed with the landscape officer.

Summary

8.11 Table 8.1 summarises the effects scoped in and out of the ES.

Table 8.1: Visual Effects

Receptor	Effects	Scope
Typical viewpoints from publicly accessible locations, including roads, footpaths and public open spaces	Visual effects	✓
'Openness' and Landscape Character	Landscape Effects	✓

9 Archaeology and Built Heritage

Introduction

9.1 This section of the Scoping Report has been prepared by Cotswold Archaeology. The proposed ES chapter will assess the likely effects of the Proposed Development on archaeological and built heritage assets.

9.2 The technical consultants are undertaking a baseline Archaeology and Heritage Assessment for the Site, to evaluate the known and potential archaeological and historic resource within it and that within a wider study area. This will be placed in the local, regional and national context, and assessed against national criteria.

Baseline Conditions

9.3 An initial assessment undertaken from readily available online sources indicates there are no designated heritage assets within the Site; however the Grade II Listed Haigh Hall is located 735m to the east of the Site, whilst 160m to the west of the Site is the Grade II Listed Church of St Paul. Several parcels of ancient woodland are located to east and north of the Site. There are twelve Grade II Listed Buildings within the 1km study area, Batley Conservation Area lies c.1.2km to the west and Howley Hall Scheduled Monument lies c.1.5km to the north-west. These built heritage and historic landscape assets will assessed in detail on the basis of the potential impact to their heritage significance as a result of development of the Site.

9.4 The likely presence of buried archaeological remains within the Site has been primarily identified through cropmark evidence identified on aerial photographs. In addition to these cropmark features, there is evidence of the basal remains of a World War II decoy emplacement.

9.5 A Geophysical survey carried out over the majority of the Site (GSB 1998), confirmed cropmarks identified within the Site are likely to be of archaeological origin, these cannot yet be dated or their extent fully understood. Morphologically there is a likelihood that some or all of these potential archaeological features may comprise the buried and infilled remains of ditches and a possible sub-rectangular enclosure. Further anomalies identified in the results of the geophysical survey include two linear responses forming an 'L' shape, which are likely to be associated with the World War II decoy airfield.

9.6 An initial walkover survey of the Site, which was under crop at the time, did not identify any ground level heritage assets, or earthworks indicative of surviving archaeological remains. An initial interrogation of West Yorkshire Archives indicates that the Site appears to have been in agricultural use at least since the 18th century; however, online sources indicate the parts of the Site were mined for coal, with former shafts present within the central region of the Site.

Legislation, Planning Policy and Guidance

9.7 There are two primary Acts governing the conservation and management of the historic environment in an English context.

National Planning Policy

9.8 Section 16 of the NPPF (2018); *Conserving and enhancing the historic environment*, provides guidance for planning authorities, property owners, developers and other on the conservation and investigation of heritage assets. Overall, objectives of Section 16b of the NPPF can be summaries as seeking the:

- Delivery of sustainable development;
- Understanding the wider social, cultural, economic and environmental benefits brought by the conservation of the historic environment;
- Conservation of England's heritage assets in a manner appropriate to their significance; and
- Recognition of the value that heritage makes to our knowledge and understanding of the past.
- In considering any planning application for development, the planning authority will be mindful of the framework set by government policy, in the instance the NPPF, by current development plan policy and by other material considerations.

Local Planning Policy

9.9 The key local planning policy to take account of within the heritage assessment can be found within the Kirklees Local Plan, which was submitted for independent review in April 2017. The key policy within the plan is Policy PLP 35: Historic Environment.

Method of Assessment

9.10 An assessment will be undertaken of the likely significance effects of the Proposed Development on the environment with respect to the archaeological resource and built heritage and will consider both designated and non-designated assets.

9.11 Initial baseline information will be obtained using best practice guideline, including the NPPF, Chartered Institute for Archaeologists (CIfA) standards and guidance, Historic England advice, local planning authority guidance and other guidance from statutory and non-statutory bodies where applicable. The baseline information will examine the following:

- Relevant local planning policy;
- Relevant policy and guidance found in NPPF;
- Geology and topography, including previous site specific geotechnical information and the British Geological Survey online record of borehole data;
- A search of the Yorkshire Historic Environment Record centred on the Site and extending a minimum 1km from the site boundary (the study area) for details of previously completed archaeological works and recorded heritage assets in the study area as well as data on historic landscape character;
- West Yorkshire District Council with regard to any Local List of non-designated Heritage Assets;
- The NHLE, maintained by Historic England, for statutory designated heritage assets including Scheduled Monuments, Registered Parks and Garden, Listed Buildings, Battlefield and World Heritage Sites;
- The Historic England Archives at Swindon for Archives Monuments Information England (AMIE) data and historic aerial photographs;

- West Yorkshire Archives for documentary sources and historic mapping to demonstrate previous land-use and to identify any likely impacts upon heritage resource within the Site;
- Archaeological background including published and unpublished sources, drawn from a variety of sources;
- The result of on-site and adjacent archaeological investigations; and
- A site walkover survey.

9.12 The Desk-Based Assessment will be informed by baseline information obtained for a study area extending a minimum of 1km from the development boundary and will be produced in accordance with professional guidance including the Charted Institute for Archaeologist Standard and guidance for historic environment desk-based assessment (2017).

Summary of Assessment Scope

9.13 The ES Chapter will provide a summary of the baseline assessment results, which will be derived from the results of two stand-alone Desk-Based Assessments and any supporting field surveys that may be required. Such supporting field surveys may include further targeted archaeological investigation to determine the nature, extent and origin of buried archaeological remains (further targeted geophysical survey and / or trial trench evaluation). The results of any such investigations could also be provided as appendices to the ES Chapter and will assist in informing an appropriately robust mitigation strategy.

10 Noise and Vibration

Introduction

10.1 This section of the Scoping Report has been prepared by Delta Simons. The proposed ES chapter will assess the potential noise and vibration impacts of the Proposed Development. The noise assessment will be undertaken in accordance with the following guidance:

- National Planning Policy Framework (NPPF), 2018;
- Noise Policy Statement for England;
- National Planning Practice Guidance (NPPG), 2014;
- British Standard 8233:2014: Sound Insulation and Noise Reduction for Buildings;
- Calculation of Road Traffic Noise (CRTN);
- Design Manual for Roads and Bridges (DMRB);
- British Standard 5228: Code of Practice for Noise and Vibration Control on Construction and Open Sites;
- British Standard 4142:2014: Methods for rating and assessing industrial and commercial sound; and
- West Yorkshire Planning Consultation Guidance – Noise and Vibration.

Baseline Conditions

10.2 The baseline noise levels at the existing and proposed noise sensitive receptors will be measured in accordance with BS7445, at locations to be agreed with the local authority.

10.3 The noise climate across the Site is likely to be dominated by local and distant road traffic, and there could be some noise from commercial and agricultural buildings on the Site perimeter.

Potential Noise and Vibration Impacts

10.4 Potential noise and vibration impacts during the construction and operational phases to be addressed by the ES are as follows:

- Noise and vibration impacts arising from construction processes affecting noise sensitive receptors;
- Noise impacts to future residents within the Site from existing transport or industrial related noise sources;
- Noise impacts to existing and future residents from changes in traffic associated with the redevelopment; and
- Noise impacts to existing and future receptors from mechanical building services plant and operations of the non-residential buildings associated with the new development.

Method of Assessment

10.5 Delta Simons will measure the existing residual and background noise environment for daytime and night-time periods. The measurements will include simultaneous broadband, spectral and statistical data that also satisfies the requirements of BS 7445.

10.6 Where suitable safe access is available, Delta Simons will undertake unattended long term measurements at the noise sensitive locations, over a minimum period of 24 hours. The measurements will record audio so that dominant noise sources can be identified for unattended periods.

10.7 Noise levels at existing receptors subject to potentially significant changes in road traffic will be measured using the shortened CRTN method with the measurements taken over three consecutive hours during the daytime.

Construction Noise and Vibration Assessment

10.8 Delta Simons will predict likely noise and vibration levels during Site works from the information provided by the client and noise data and methodology within BS 5228-1: 2014, review predicted noise levels and determine the significance based on fixed noise limits as per the methodology Annexe E of BS 5228-1.

10.9 If the proposed details indicate a noise impact that does not satisfy the limits, a scheme for the mitigation of the noise may be required. Potentially mitigating features include re-siting or re-directing the noise producing plant, barriers, screens, and limiting time and duration of operation.

Impact of Development – Fixed Plant and On-site Traffic Noise Assessment

10.10 Delta Simons use proprietary acoustic environmental noise modelling software, Cadna/A, to build a 3D model of the existing and proposed road schemes and surrounding buildings.

10.11 Delta Simons will calculate noise levels from the existing and proposed road schemes following the guidance given in the Calculation of Road Traffic Noise (CRTN). Assess the impact following the guidance given in Design Manual for Roads and Bridges (DMRB).

10.12 Assessments will be undertaken at the proposed year of opening and for the year of opening plus 15 years.

10.13 Delta Simons will report the calculation methodologies used, assumptions, supplied information and noise level contour maps for the existing road traffic flows and proposed traffic flows, including the changes in level for the short and long terms assessment periods.

Assessment of site suitability

10.14 Delta Simons will calculate the noise impact on the proposed Site with proprietary acoustic environmental noise modelling software, Cadna/A. The model will include the shielding effect of the existing and proposed buildings.

10.15 Furthermore, Delta Simons will determine a set of daytime $L_{Aeq,16\ hr}$, night time $L_{Aeq,8hr}$ and night time maximum, $L_{AF,max}$ levels on which to assess the acoustic risk to residents and on which to base the sound insulation design.

10.16 Comment on the Site suitability for housing and the potential to achieve the internal and external noise limits described in BS 8233 and assess any commercial sound source in accordance with BS4142 and local authority guidance.

10.17 Provide guidance on the acoustic implications for potential ventilation strategies, in accordance with the current Part F of the Building Regulations.

Assessment of operational noise from the new development

10.18 Delta Simons will assess the impact of noise sources associated with the Site operations, including schools and commercial spaces and guidance on appropriate noise limits or mitigation requirements.

Consultation

10.19 The survey and assessment methodology will be discussed with the local authority, to agree the general approach and to ensure it is appropriate for the local authority's requirements.

11 Air Quality

Introduction

11.1 This section of the Scoping Report has been prepared by Delta Simons. The proposed ES chapter will assess the likely significant effects of the construction and operation of the Proposed Development on the environment with respect to air quality. The key issues for consideration include:

- The impact of dust and particulate (PM_{10}) emissions during construction of the Proposed Development. Fugitive dust has the potential to adversely impact public amenity whilst particulate emissions can adversely affect public health; and
- The impact of existing oxides of nitrogen and particulate (PM_{10} and $PM_{2.5}$) concentrations on the suitability of the Site for development.
- The impact of oxides of nitrogen and particulate (PM_{10} and $PM_{2.5}$) emissions from the operation of the Proposed Development (building and transport) on existing receptors in the area.

Baseline Conditions

Local Air Quality Management

11.2 As required by the Environment Act (1995), Kirklees Council (KC) has undertaken a review and assessment of air quality within their area of jurisdiction. This process has indicated that annual mean nitrogen dioxide (NO_2) concentrations are above the Air Quality Objective (AQO) of 40µg/m^3, as defined within the Air Quality Standards Regulations (2010), at locations of relevant exposure within the council's administrative extents. As such, twelve Air Quality Management Areas (AQMAs) have been declared, with the closest to the development described as follows:

"The designated area incorporates Leeds Road (A653), Dewsbury Ring Road (A638), Wakefield Road (A638), Highgate Road, Highgate Terrace, Bank Street and Old Bank Road, which is in close proximity to Dewsbury Town Centre"

11.3 The Site is located 1.4km north-west of the District of Wakefield (WMDC). Wakefield Metropolitan District Council (WMDC) have also undertaken review and assessment of air quality within their area of jurisdiction. This process indicated that NO_2 concentrations are above the AQO within the District. As such, ten AQMAs have been declared, with the closest to the development described as follows:

"An area encompassing most of the Wakefield urban area"

11.4 The Site is located approximately 2.1km north-east and 1.4km north-west of the AQMAs, respectively. As such, there is the potential for traffic generated by the development during operation to increase pollution levels within the designated areas. This will therefore be considered within the ES.

11.5 The Site is located within the vicinity of a number of existing residential properties. These may be affected by any atmospheric emissions associated with the development and will therefore be considered as sensitive receptors within the ES.

11.6 The Site is bound to the west by the A563 Leeds Road, a source of road vehicle pollution. The ES will therefore consider the suitability of the development for the proposed end-use in respect to air quality.

Background Pollutant Concentrations

11.7 Predictions of NO_2 and particulate matter with an aerodynamic diameter of less than 10µm (PM_{10}) concentrations on a 1km by 1km grid basis have been produced by Department for Environment, Food and Rural Affairs (DEFRA). These maps cover the entire of the UK to assist Local Authorities (LAs) in their Review and Assessment of air quality. The Proposed Development is partially located in six grid squares. Data for these locations was downloaded from the DEFRA website[2] for the current year of 2018 and are summarised in Table 11.1.

Table 11.1 Background Pollutant Concentrations

GRID SQUARE (NGR)	BACKGROUND CONCENTRATION (µg/m³)	
	NO_2	PM_{10}
426500, 422500	16.12	12.67
426500, 423500	15.66	12.84
426500, 424500	15.09	14.72
427500, 422500	14.45	12.81
427500, 423500	13.53	13.08
427500, 424500	14.21	12.65

11.8 As shown in Table 11.1, predicted background NO_2 and PM_{10} concentrations are below the relevant AQOs of 40µg/m³ at the Site.

Key Issues and Requirement for Assessment

11.9 The proposals have the potential to cause air quality impacts as a result of fugitive dust emissions during construction and road traffic exhaust emissions associated with vehicles travelling to and from the Site during operation, as well as expose future occupants to elevated pollution levels. These effects will therefore be considered as part of the EIA.

Assessment Methodology

11.10 It is proposed to undertake an Air Quality Assessment for inclusion within the ES in accordance with the following methodology.

11.11 Baseline air quality conditions in the vicinity of the Site will be defined based on recent monitoring results and information from the DEFRA Air Quality Resource[3]. Sensitive locations that could be affected by the proposals will also be identified, as well as any relevant planning policies or guidance.

11.12 During the construction of the Proposed Development there is the potential for air quality impacts as a result of fugitive dust emissions from earthworks, construction and trackout activities. It is proposed to assess these in accordance with the Institute of Air Quality Management (IAQM) guidance 'Assessment of Dust from Demolition and Construction V1.1'[4].

11.13 During the operation of the development there is the potential for air quality impacts as a result of road traffic exhaust emissions associated with vehicles travelling to and from the Site, as well as the exposure of future users to poor air quality. It is proposed to assess these issues through detailed dispersion modelling using ADMS-Roads in order to fully quantify concentrations of NO_2 and PM_{10} at sensitive locations both with and without the development in place.

[2] https://uk-air.defra.gov.uk/data/laqm-background-maps?year=2015.
[3] https://uk-air.defra.gov.uk/data/laqm-background-maps?year=2015.
[4] Guidance on the Assessment of Dust from Demolition and Construction V1.1, IAQM, 2016.

11.14 The assessment will be undertaken using relevant traffic data, local land use characteristics and 1-year of hourly meteorological records taken from Emley Moor observation station. The modelling outputs will be verified against local monitoring data in accordance with the DEFRA methodology[5]. Impacts will be predicted at sensitive receptor locations and also displayed graphically throughout the assessment extents using contour plots.

11.15 The significance of potential impacts at sensitive receptors will be determined based on the predicted magnitude of change in pollutant concentrations and the criteria provided within the IAQM document 'Land-Use Planning & Development Control: Planning for Air Quality'[6].

11.16 If required following assessment of potential impacts, suitable mitigation measures will be identified in order to reduce air quality effects to an appropriate level. These will be based on the West Yorkshire Low Emission Planning Guidance[7] document.

[5] Local Air Quality Management Technical Guidance (TG16), DEFRA, 2018.
[6] Land-Use Planning & Development Control: Planning for Air Quality, IAQM, 2017.
[7] Air Quality and Emissions: Technical Planning Guidance, West Yorkshire Low Emissions Group, 2014.

12 Flood Risk and Water Environment

Introduction

12.1 This section of the Scoping Report has been prepared by Patrick Parsons. The proposed ES chapter will assess the impact of the Proposed Development on hydrology, drainage and flood risk. This section of the report outlines the basis for preparation of the ES Chapter and supporting technical studies and assessments including a site-specific Flood Risk Assessment and Drainage Strategy.

Assessment Methodology

12.2 Flood Risk Assessment associated with Site A only which following assessment of the flood maps on the Environment Agency website details the development area to be within Flood Zone 1. Therefore, the aforementioned assessment will be undertaken in accordance with Department for Communities and Local Government (DCLG) Technical Guidance to the National Planning Policy Framework (NPPF July 2018) which will include the following:

- Undertake a site assessment including adjacent third-party land where applicable;
- Preliminary assessment of the existing site to establish a current surface water run-off flow rate and existing site drainage format in which to compare against the proposed development applying the hierarchy method of surface water management identifying attenuation requirements if applicable so that each development does not increase the risk of flooding;
- Consultation and liaison with the Environment Agency and Local Planning Authority; and
- Production of a final flood risk assessment report associated with the proposed development site which will be provided as supporting documentation to the planning application.

12.3 Undertake a preliminary assessment associated with the proposed surface water drainage requirements in which to service the development. The assessment associated with proposed surface water management will be undertaken in accordance with Building Regulations Part H and Yorkshire Water Services (YWS) requirements which will follow the hierarchy in order of priority as detailed below:

- Use of SUDS;
- Watercourse; and
- Public Sewer.

12.4 Prepare and issue a YWS Pre-Development enquiry application based on a sewerage application only.

12.5 A preliminary proposed surface water drainage appraisal will be developed including on-site attenuation requirements using SUDS techniques where applicable, based on restricted discharge rates and point of discharge agreed with both YWS and the Lead Local Flood Authority, the proposed scheme and the existing topographical survey for each site.

12.6 Undertake a preliminary assessment associated with the proposed foul water drainage requirements in which to service the development. The assessment will be based on recommendations from the YWS Pre-Development Enquiry response and will consider the

proposed scheme, the existing topographical survey for the site and the point of discharge for the proposed foul water system.

12.7 The overall assessment will also consider diversion routes of existing sewer infrastructure impacted by the development if necessary.

12.8 Full liaison with YWS, Environment Agency and the Local Flood Authority where applicable.

12.9 Provide a detailed Environmental Statement on Flood Risk and Drainage which will include:

- A review of relevant legislation and policy;
- Method of assessment;
- A review of baseline conditions (existing drainage such as watercourses, sewers, etc.);
- An assessment and review of the Strategic Flood Risk Assessment for the area;
- Overall Flood Risk Assessment associated with Site B only which following assessment of the flood maps on the Environment Agency website details the development area to be within Flood Zone 1. Therefore, the assessment will be undertaken in accordance with Department for Communities and Local Government (DCLG) Technical Guidance to the National Planning Policy Framework (NPPF July 2018);
- A development impact assessment during the construction and operational phases;
- A review of mitigation measures against flood risk during the construction and operational phases; and
- Consultation and liaison with the Environment Agency and Lead Local Flood Authority.

Summary

12.10 In summary, the objective of the report is to provide a guidance to secure Outline Planning Permission (OPP) for the development and satisfying the LLFA's requirements on flood risk and surface water drainage.

12.11 The Developer should follow the SUDS Hierarchy in terms of prevention of flow, source control, site control and regional control. The design should where possible utilise infiltration drainage methods as a priority. Where this is not possible then provide positive drainage limited to the 5 l/s/ha of the developed area discharging to the Hey Beck its tributaries or surface water system discharging to the river.

12.12 Provision of suggested solutions for foul sewerage disposal, surface water disposal.

12.13 The proposed surface water drainage strategy (including adoption and maintenance responsibilities of SUDS features) should be further consulted by the key parties and implemented to ensure that the post development runoff rates and volumes are no greater than the pre-development rates.

- A review of existing drainage records
- Locations and results of Building Regulation Part H percolation tests and methodologies
- Analysis of percolation test results to determine suitability for soakaways
- Assessment of the impermeable areas and peak rates of run-off where soakaways are not suitable
- Calculation of the volume of run-off pre and post development and identification of how the additional volume could be dealt with (by infiltration, rainwater recycling or attenuated discharge)
- The submission of a Developer Enquiry to Yorkshire Water Services

- Consultation with Lead Local Flood Authority, Environment Agency and Yorkshire Water services where appropriate
- Assessment of drainage options for the site

12.14 Table 12.1 summarises the Drainage and Flood Risk to be included for detailed assessment in the Environmental Statement (ES):

Table 12.1: Drainage and Flood Risk

Receptor	Effects	Scoped In
Local water Courses	Additional risk of flooding	
Public drainage network	Decrease in available capacity	
Ground conditions	Alternative solution to SuDS such as watercourse or public sewer	

13 Ground Conditions

Introduction

13.1 This section of the Scoping Report has been prepared by Patrick Parsons.

13.2 This chapter will address issues relating to existing geo-environmental conditions at the Site and will include consideration of the potential for the Site to be affected by contamination and ground instability. The range of effects associated with the construction phase and the operation of the Proposed Development will be considered.

13.3 A Phase I Desk Study Report has previously been completed by Patrick Parsons and a Coal Mining Risk Assessment has been commissioned.

Baseline Conditions

13.4 Within the Site there a 4 coal seams outcropping and 6 coal seams anticipated as being present at shallow depth (less than 30m below the surface).

13.5 A significant part of the Site is within a Development High Risk Area and affected by probable past shallow mining with recorded past shallow mining also recorded beneath the Site.

13.6 3 former mine entries are recorded as present within the Site and other unrecorded mine entries are anticipated.

13.7 These criteria and that the site lies within an historic mining area suggests a significant risk to development from ground instability as a consequence of mining legacies.

13.8 Extensive remedial ground consolidation of past shallow mineworkings and mine entries is anticipated.

Method of Assessment

13.9 The Phase I Desk Study Report will be reviewed and updated, as necessary, to determine the baseline conditions at the site in respect to potential contamination and ground instability. The Phase I report included a detailed site walkover survey, a review of historical ordnance survey and geological plans and review of a Coal Authority Mining Report. A conceptual Site model and preliminary risk assessment were also included in the Phase I report.

13.10 The potential for the Site to be affected by instability will be further addressed with reference to the Coal Mining Risk Assessment which is to be completed.

13.11 The potential for contamination effects will be evaluated as part of the Environmental Statement using the conceptual site model which has been developed as part of the Phase I Desk Study Report with consideration of identified potential Source – Pathway – Receptor linkages.

Appendix 1

Site Location Plan

Notes:
Do not scale from this drawing.
All contractors must visit the site and be responsible for taking and checking Dimensions.
All construction information should be taken from figured dimensions only.
Any discrepancies between drawings, specifications and site conditions must be brought to the attention of the supervising officer.
This drawing and the works depicted are the copyright of JTP.

This drawing is for planning purposes only. It is not intended to be used for construction purposes. Whilst all reasonable efforts are used to ensure drawings are accurate, JTP accept no responsibility or liability for any reliance placed on, or use made of, this plan by anyone for purposes other than those stated above.

Key

Red Line Boundary

Rev	Date	Description	Drawn	Chkd
P1	16.02.18	First Issue	VB	GP

Drawing Status
PLANNING

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Project
Land at Chidswell

Drawing Title
Red Line Boundary

Scale @ A1 1:5000
Job Ref. 00974
Drawing No. 00974 _S_01
Revision P1
Scale Bar 0 50 100 150 200 250m

Deloitte.
Real Estate

This report has been prepared for CC Projects and on the understanding that it will be made publically available.

The information contained within this report is provided to assist CC Projects. The report makes use of a range of third party data sources. Whilst every reasonable care has been taken in compiling this report, Deloitte LLP cannot guarantee its accuracy.

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2.2 Kirklees Metropolitan District Council’s EIA Scoping Response

Scoping Opinion

This is the Scoping Opinion (the Opinion) provided by Kirklees Council in respect of the content of the Environmental Statement for the *Development of land at Chidswell.*

This report sets out the Council's Opinion on the basis of the information provided in the report entitled *Environmental Impact Assessment (EIA) - Scoping Report (September 2018)* ('the Scoping Report') prepared by Deloitte Real Estate on behalf of the applicant.

Additional documents which are considered to be part of the Scoping Report include:

Figure 1.5 – Zone of Theoretical Visibility (ref – RFM-XX-00-RP-0001)
Highways Scoping Note - A13398/VA

Matters are not scoped out unless specifically addressed and justified by the applicant, and confirmed as being scoped out by Kirklees Council.

Introduction

On 28th September 2018, Kirklees Council received the Scoping Report submitted under Regulation 15 of the Town and Country Planning (Environmental Impact Assessment) Regulations 2017 ("EIA"). This Opinion is made in response to this request and should be read in conjunction with the applicant's Scoping Report.

The EIA Regulations define 'EIA Development' (Regulation 2(1)), and stipulate that any proposed development falling within the description of a 'Schedule 2 development' within the meaning of the Regulations, will be subject to an EIA where such development is likely to have 'significant' effects on the environment by virtue of such factors as its nature, size or location.

Given the nature of the Proposed Development in regard to the redevelopment of the Site, and the overall scale of development, an EIA is considered appropriate to test the likely significant effects of the Proposed Development. The applicant therefore proposes to undertake an EIA and to submit an Environmental Statement in support of any subsequent planning application.

This Opinion should not be construed as implying that the Council agrees with the information or comments provided by the applicant.

The Council has a duty under Regulation 15 to consult before adopting a scoping opinion. A full list of the consultation bodies is provided at Appendix A.

The Environmental Statement ("ES") submitted by the applicant should demonstrate consideration of the points raised by the consultation bodies. It is recommended that a table is provided in the ES summarising the scoping responses from the consultation bodies and how they are, or are not, addressed in the ES.

Any consultation responses received after the statutory deadline for receipt of comments will not be taken into account within this Opinion. Late responses will be forwarded to the applicant and will be made available on our website. The applicant should also give due consideration to those comments in carrying out the EIA.

Proposed Development

According to the applicant the proposed development is for an outline planning application as follows:

"Outline Application (all matters reserved except access) for a mixed-use development of 1,354 dwellings, 35 hectares of employment development, a primary school, local centre, green space, access and other associated infrastructure."

The Proposed Development aims to include:

- The residential development will comprise an appropriate range and mix of housing to meet local needs and respond to market requirements;
- The employment space created will include a range of larger and smaller scale opportunities, providing the flexibility to respond to local and national requirements attracted by good accessibility to the M1 and M62 strategic road network;
- Promote a sustainable community with access to school facilities and a local centre on site to serve the new community and existing residents;
- Retention of key woodland blocks (Dum Wood and Dogloitch Wood) and promotion of green fingers throughout the site to promote walkable and cycle friendly neighbourhoods with a hierarchy of easy to navigate routes connecting neighbourhoods, spaces and employment uses; and
- Provision of multiple vehicular access points to ensure effective connectivity with the strategic transport network for cars and public transport.

Additional features of and activities related to the Proposed Development are expected to include:

- Significant land re-grading to create development platforms for buildings.
- Removal of existing trees and replanting of new trees with an expected overall neutral effect on tree numbers, and an aspiration to provide a net gain in tree numbers.
- Introduction of drainage infrastructure and potential sustainable urban drainage system (SUDS) features.
- Associated hard and soft landscaping.

Site Description

The Site is located to the east of the A653 Leeds Road dual carriageway, which is a strategic corridor between Dewsbury and Leeds. In the immediate vicinity of the Site, Leeds Road runs in a north-south direction, adjoining the A638 Wakefield Road and Junction 28 (the Tingley Interchange) of the M62 Motorway to the north. The A638 Wakefield Road links with the M1 Motorway Junction 40 to the east of the Site.

The Site lies within the Green Belt and covers an area of approximately 112 hectares, which is wholly within the administrative boundary of Kirklees Council.

The Site is part of the proposed mixed-use allocation MX1905 in the Publication Draft Kirklees Local Plan which was submitted for Examination in April 2017. The Site excludes the independent site to the north, which is to be accessed from Hey Back Lane and is subject to a separate planning application. To the east of the Site there is land predominantly in agricultural uses.

The Site is gently undulating, with two notable landscape features: a higher 'ridge' to the west of the centre, and a 'bowl-like' valley to the north, drained by the streams and ditches. The Site does not contain any listed buildings, nor is it located within a Conservation Area. The nearest listed building is Haigh Hall (Grade II), located approximately 735m to the east of the Site. There are no statutory environmental designations on the Site, however the Site is adjacent to an area identified as a Local Wildlife Site which is part of the Wildlife Habitat Network and is designated as Ancient Woodland (Dogloitch Wood and Dum Wood to the east).

There are a number of Public Rights of Way which either pass through the site or lie in close proximity. These routes will be fully considered as part of the planning application.

The Site is not located within an Air Quality Management Area (AQMA).

The Site is located within Flood Zone 1 and is therefore at low risk of flooding. A water main and existing sewerage infrastructure crosses the Site which may need to be diverted, removed or altered. High voltage power lines also cross the site.

Site Context

The surrounding area is characterised predominantly by agricultural land, with a mix of early and late 20th century bungalows and semi-detached properties fronting the main arterial routes.

The Site is part of the proposed mixed-use allocation MX1905 in the Publication Draft Kirklees Local Plan which was submitted for Examination in April 2017.

The vision for Kirklees is that by 2031, it will be a great place to live, work and invest in, delivered through an integrated approach to housing and employment. Development will have taken place in a sustainable way by balancing economic, social and environmental priorities.

The Leeds City Region SEP sets out the spatial priority areas to maximise growth potential and ensure prosperity across the whole City Region. The SEP identifies growth opportunities which have strategic significance to the whole of the City Region. This includes strategic employment and mixed-use sites. A total of five major development area proposals have been identified in the Leeds City Region, including land at Chidswell, Dewsbury ("the Site").

A concept masterplan has been developed which sets out how the Site could be developed to accommodate the housing and employment requirements of the allocation.

Scope of Environmental Statement

The applicant has set out the following scope:

- A description of the development incorporating the information required by Schedule 4 para 1(a);
- A description of the reasonable alternatives studied (Schedule 4 para 2);
- A description of the baseline scenario and an outline of the evolution of the baseline without the Proposed Development (Schedule 4 para 3);
- A description of the aspects of the environment specified in Regulation 4(2) likely to be significantly affected by the Proposed Development;
- A description of the likely significant effects of the Proposed Development on the environment resulting from the matters specified in Schedule 4 para 5;
- A description of the forecasting methods or evidence used in assessing likely significant effects (Schedule 4 para 6);
- A description of the measures envisaged to prevent, reduce and where possible offset any significant adverse effects on the environment (Schedule 4 para 7);

As the planning application is to be submitted in outline form with all matters reserved except for access, the applicant confirms the ES will be undertaken on the basis of a series of parameter plans. This will include a masterplan showing the overall development, and a series of parameter plans showing the main development area, drainage ponds, key landscape/ecology areas and building heights.

According to the application the introductory chapters of the ES will provide the following information:

- An introduction to the ES in a legislative and site specific context;
- Description of the Site and proposals;
- Alternatives considered and project design evolution;
- EIA methodology;
- ES structure; and
- Details of the EIA project team.

According to the applicant the geographical coverage of the EIA will be determined by a number of factors including:

- The physical extent of work;
- The nature of the baseline environment, including the location of sensitive receptors;
- The distance over which effects will be significant; and
- The presence and type of "pathways" along which impacts may be spread.

The Council's comments

Careful consideration should be given to the description of development. It is noted that the proposals may include significant land re-grading, details of which (along with the associated effects) should be fully detailed in the relevant chapters of the ES. The effects of such works in themselves will require careful consideration to be given to the geographical coverage of the ES.

In terms of the description of the development site and surrounding area, the following approach is recommended:

- A single red line plan should be provided to illustrate all land affected by the proposed works, including all temporary works, such as construction compounds, access roads and storage areas;
- A single red line plan along with a blue line boundary should be provided to show the extent of land ownership within the local area.

Flexibility

It is noted that it is intended to submit the application in outline form. In addition, the proposed development forms a masterplanned approach to site development. However, the applicant should make every attempt to narrow the range of options/details and explain clearly in the ES which elements of the proposed development have yet to be finalised and provide reasons. Parameters of the development should be clearly defined in terms of quantum, scale and location within the site.

In terms of phasing, the applicant should consider testing maximum parameters to produce a robust assessment across multiple plots. This is particularly the case when considering construction relating impacts. However, the effects arising from the way in which the wider site is pieced together should also be considered. This includes infrastructure matters such as roads, drainage and green infrastructure.

It is agreed that the 2017 EIA Regulations means that applicants can now set out plain and uncontroversial mitigation measures that could be included when considering the likely significant effects of a development.

Cumulative Impact

The ES should include an impact assessment to identify, describe and evaluate the effects that are likely to result from the project in combination with other projects and activities that are being, have been or will be carried out. The following types of projects should be included in such an assessment:

a. existing recently completed projects;
b. approved but uncompleted projects;
c. ongoing activities;
d. plans or projects for which an application has been made and which are under consideration by Kirklees Council and Leeds City Council within a set boundary of the site (which can be agreed with the Council).
e. plans and projects which are reasonably foreseeable, ie projects for which an application has not yet been submitted, but which are likely to progress before

completion of the development and for which sufficient information is available to assess the likelihood of cumulative effects.

Traffic and Transportation

The proposed development has the potential to generate significant traffic both from construction and operation. It is intended that the ES considers the likely significant effects of the proposed development with respect to traffic and transportation.

The applicant appointed Pell Frischmann to provide a Scoping Note which accompanied the original Scoping Report.

The Council commissioned AECOM to review the Scoping Report prepared by the applicant in respect of traffic and transportation issues.

Highways England have assessed the Scoping Report.

The baseline conditions outlined in the Scoping Report are agreed.

The local bus services baseline information set out in the Scoping Report is agreed.

Site Access A (Heybeck Lane) is proposed in the form of a priority T-junction with right turn lane. An indicative design has been provided within the appendix of the Pell Frischman scoping note. The access design is considered acceptable in principle subject to capacity testing, detailed design and a road safety audit. However it is considered that the internal access road width of 7.3 metres is overdesigned. A carriageway width of 5.5 metres is considered acceptable for an access serving 250 residential units except on a bus route where the carriageway width should be 6.75 metres (ref: Highways Design Guide, Kirklees Local Plan Supplementary Planning Document, October 2018).

The road is subject to a 30mph speed limit along the site frontage. Drawing A13398-T-002 shows that visibility splays of 2.4m x 70m can be achieved in both directions and are considered acceptable.

Site Access B (Leeds Road North) and Site Access C (Leeds Road South) are proposed in the form of a signal controlled junctions. Kirklees Council have reservations about the installation of signal controlled junctions along the A653 Leeds Road corridor due to the potential impact on journey times. The applicant is encouraged to look at alternative junction types. It will also be necessary to provide an analysis of the effect on journey times between the Challenge Way / John Ormsby V C Way junction and the Syke Road / Rein Road junction for the current, the future baseline and the future baseline plus development scenarios. Site Access D (Chidswell Lane) is proposed in the form of a priority T-junction.

An indicative design has been provided within the Pell Frischman scoping note. The access design is considered acceptable in principle subject to capacity testing, detailed design and a road safety audit. However it is considered that the internal access road width of 7.3 metres is overdesigned. A carriageway width of 5.5 metres is considered acceptable for an access serving 250 residential units except on a bus route where the carriageway width should be 6.75 metres (ref: Highways

Design Guide, Kirklees Local Plan Supplementary Planning Document, October 2018). The road is subject to a 30mph speed limit along the site frontage. Drawing A13398-T-005 shows that visibility splays of 2.4m x 70m can be achieved in both directions and are considered acceptable.

Site Access E (Owl Lane) is proposed in the form of a four arm roundabout on Owl Lane with a new access road running parallel to Windsor Road between Owl Lane and the southern edge of the site. This includes running through an adjacent landholding under the control of Barratt David Wilson Homes. An indicative design has been provided within the Pell Frischman technical note and includes:

· A new roundabout on Owl Lane;
· A new access road between Owl Lane and the southern edge of the site where it meets Chidswell Lane before continuing into the site. Northbound traffic on Chidswell Lane will be required to give-way to traffic on the new link road;
· Stopping up access to Chidswell Lane at the junction with Windsor Road;
· Providing a new link road between Windsor Road and the new access road with priority T-junctions provided at either end.

The access design is considered acceptable in principle subject to capacity testing, detailed design and a road safety audit.

Access points to each development area would be required prior to any of the development areas being occupied.

In terms of trip generation it is noted that the applicant has used version 6.11.1 of the TRICs database. However, the TRICs database has been updated and it is now appropriate to use version 7.5.3.

In accordance with the approach set out in the 2016 Interim Transport Assessment, the mode split for the residential land use has been derived from 2011 census data for the Dewsbury East ward (reference no. E05001398), which is considered to be the ward most representative of the sites residential travel characteristics. This approach is considered acceptable. However, a review by the Council's consultant (AECOM) queries the use of the mode split figures presented in relation to walking and cycling.

The vehicle trip rates associated with the proposed development are considered acceptable. However, the total person rate tripe should be re-calculated based on the latest version of TRICs. It is noted that no allowance has been made for internalised types with regard to residents living on-site also working on-site in the employment area. This should be given consideration.

In terms of total employment person trip rates, no TRICs analysis output within the Scoping Report in order to validate that the total person employment trip rates for each land use are acceptable. No information has been provided in terms of HGV trip rates. Both these areas of uncertainty should be clarified in any subsequent ES.

The Scoping Report makes assumption concerning the split of B1, B2 and B8 uses. However, if uncertainty still exists at the application stage then there will be a need for sensitivity testing to ensure the worst case scenario has been tested.

It is expected that the local centre/community hub will comprise local commercial facilities aimed at servicing the proposed development. This will need clarifying. On the basis of the above the assumption that there will be no net impact on the surrounding road network is acceptable.
The technical note states that the primary school will serve both the proposed development and surrounding existing residential areas with the location of the school located partly within the Dewsbury East and Batley East primary school place planning areas and as such will likely draw some pupils from these two areas.

Further information is required including:
· the number of pupils the school will accommodate;
· the numbers of staff;
· the likely split between the number of pupils living on site and those traveling from external areas; and
· the catchment areas of external pupils.

In terms of traffic modelling, the following junction assessments are proposed:

· Site Access A – Heybeck Lane – priority T-junction;
· Site Access B - Leeds Road (North) – signal controlled junction;
· Site Access C – Leeds Road (South) – signal controlled junction;
· Site Access D – Chidswell Lane – priority T-junction; and
· Site Access E – Owl Lane – priority roundabout.

Off-Site Junctions
· Junction 1: M1 Junction 40 (Flushdyke Interchange) – signal controlled roundabout;
· Junction 2: M62 Junction 28 (Tingley Interchange) – signal controlled roundabout;
· Junction 3: A653 Leeds Road / Heybeck Lane – signal controlled junction;
· Junction 4: A653 Leeds Road / Chidswell Lane – priority T-junction;
· Junction 5: A653 Leeds Road / B6128 Challenge Way / B6128 John Ormsby V C Way (Shaw Cross
Junction) – signal controlled junction;
· Junction 6: B6128 Owl Lane / Windsor Road – priority T-junction;
· Junction 7: A638 Wakefield Road / A638 Chancery Lane / B6128 Owl Lane / B6128 Leeds Road – priority roundabout;
· Junction 8: Chidswell Lane / Windsor Road – priority T-junction;
· Junction 9: A653 Leeds Road / Owl Lane – signal controlled junction; and
· Junction 10: B6128 John Ormsby V C Way / B6128 Owl Lane / Horace Waller V C Parade – priority roundabout.

It is considered that the A653 Dewsbury Road / A6029 Rein Road / Syke Road traffic signal junction should also be assessed.

In terms of traffic surveys, the proposal to undertake surveys in term-time during midweek is acceptable. Surveys should be undertaken in a neutral month such as April, May, June, September or October.

Further justification is required on the chosen assessment years of 2020 and 2030 particularly with regard to residential build out rates. Assuming planning

permission was granted in 2019, this would require 250 residential units to be built out by the end of 2020 or 5 units per week. In terms of full development being completed by 2030, this would require 154 residential units to be built per year or 3 units per week. AECOM question whether these build out rates are achievable and whether alternative assessment years should be selected.

It is proposed that the following modelling scenarios will be presented within the TA:
· 2018 Base;
· 2020 Base + Committed Development;
· 2020 Base + Committed + Site A Development;
· 2030 Base + Committed Development;
· 2030 Base + Committed + Full Development.

As set out above, further justification is required on the assessment years selected.

It is noted that traffic growth factors and committed development flows will be obtained from the Kirklees strategic traffic model. This is considered an acceptable approach.

For clarity, the Council are also aware of a planning application at West Ardsley for *circa* 299 dwellings. The application site falls within Leeds Council administrative area. The reference number of this application is 17/08262/OUT and will need to be considered as part of the cumulative assessment for traffic impact purposes and in terms of wider ES topics.

It is also recommended that the ES sets out all the committed developments as part of the analysis along with a plan and table showing the location and current status of each committed development. As an aside, officers would be willing to agree the scope of committed developments before the ES is prepared.

The proposed structure of the Transport Assessment set out in Section 9 of the technical note is considered acceptable. Additional points to note are:

- Description of the Proposed Development which includes a section on internal circulation should also include Swept Path Analysis for a Refuse Collection Vehicle and a Bus to ensure they can access and safely manoeuvre within the site.

- In terms of the mitigation section, given the size of the development and the fact that the majority of the site is not within the standard threshold of 400 metres of a bus stop, the extension of public transport links into the site connecting into surrounding areas is considered necessary in order enhance the accessibility of the site by sustainable transport modes.

The proposed structure of the Framework Travel Plan set out in Section 9 of the technical note is acceptable however an additional section setting out the roles and responsibilities of the Travel Plan Co-ordinator should be included.

It is also considered that two separate framework travel plans are prepared for the residential and employment elements of the site as the measures, targets

and monitoring will be significantly different. In addition a Framework Travel Plan for the Primary School should be prepared.

Transportation Summary

- The access points to Access A and D are acceptable in principle however the carriageway widths are considered too wide at 7.3 metres given the number of residential units the access road will be serving.
- Both access points are subject to capacity testing, detailed design and a Road Safety Audit.
- Kirklees Council have reservations about the installation of two new signal controlled junctions (Access Points B & C) on the A653 Leeds Road corridor and the potential impact on journey times. Further analysis as part of the ES is required of the effect on journey times on this corridor.
- The site is considered to be well served by existing public transport facilities, walking and cycling facilities however improvements will be required for the size of development proposed and incorporated int eh ES including:

- re-routing of existing bus services into the site; and
- ensuring high quality footways and cycleways are provided internally linking the employment, residential, local hub and primary school as well as connecting into existing networks.

- The methodology for calculating residential trip rates is considered acceptable. However the trip rates have been calculated based on an old version of TRICs. The latest version of TRICS (version 7.5.3) should be used;
- No TRICs analysis outputs have been provided for the employment trip rates in order to confirm and validate that the trip rates are acceptable. In addition the trip rates have been calculated based on an old version of TRICs. The latest version of TRICS (version 7.5.3) should be used;
- No information on HGV trip rates have been provided and should be included in the Transport Assessment;
- The mode split derived for the residential and employment land uses using the 2011 Journey to Work census data is considered acceptable;
- No allowance has been made for internalised trips with regards to residents living on the site working within the employment area;
- The approach to trip distribution is considered acceptable;
- No information has been provided on trips being assigned to the network;
- The junctions identified for assessment and assessment time periods are considered acceptable. Junction capacity analysis should also be undertaken at the A653 Dewsbury Road / A6029 Rein Road / Syke Road traffic signal junction;
- Further justification is required with regard to the assessment years chosen;
- Swept Path Analysis should be provided within the Transport Assessment;
- The production of comprehensive framework travel plan to support the proposals are necessary in terms of actively encouraging residents, workers and pupils / staff to use sustainable modes of transport to and from the development. It is recommended that separate framework travel

plans are prepared for the residential and employment areas and the primary school.
- Committed developments should be agreed before further analysis.

A full copy of the comments from the Council's consultant, AECOM, is appended in appendix A.

Highways England comments:

1) Highways England has previously considered the impact of the proposed site through assessment work related to the Kirklees Draft Local Plan Allocations, the previous work considered a much lower quantum of development which was envisaged to come forward by 2021. Therefore, a full TA and TP will need to be submitted with the forthcoming planning application, which considers the impact of the proposals upon the SRN;

2) Details of the site access will need to be confirmed within the TA;

3) The level of development assessed within the TA will need to correlate to that specified on the forthcoming planning application;

4) DetaiIs of the quantum of development to come forward within each phase and how each plot will be accessed will need to be confirmed within the TA;

5) Given that it is likely that the development's impact will be at SRN junctions located within the Wakefield and Leeds Council administrative areas, these Councils will need to be involved in discussions relating to the impact of the proposals at junctions within their areas;

7) Details of trip generation by all modes should be considered as part of the TA and TP; and

8) The proposed assessment method for the TA set out in Paragraph 6.2.7 of the TA is generally appropriate. However, a TA Scoping Report should be prepared by the Applicant's transport consultants so that the TA input parameters, particularly trip generation, distribution, extent of study area and assessment years can be agreed in detail prior to the submission of the TA.

Given the late submission of the applicant's Scoping Note (provided by Pell Frishmann), Highways England were not re-consulted.

Full comments in appendix A.

Ecology and Nature Conservation

The suite of surveys undertaken, and in progress, appears to be appropriate. However, the applicant should be aware that where there is deviation from survey methods in published survey guidance for individual species and species groups an appropriate ecological justification for this will be required.

The scoping report suggests that consultation with local wildlife groups will be undertaken where appropriate. Consideration should be given to consultation with the West Yorkshire Bat Group, Huddersfield Birdwatchers Club and Kirklees Badger Protection Group. Huddersfield Birdwatchers Club in particular hold data not available through the local records centre.

The applicant should be made aware that the Chartered Institute of Ecology and Environmental Management (CIEEM) have recently issued revised guidance on Ecological Impact Assessments (CIEEM, 2018). The newest version of guidance should be used to inform the assessment methodology.

Ecological Impact Assessment should focus primarily on identifying 'important' ecological features and presenting a comprehensive assessment of impacts resulting in effects on these features, which will constitute 'significant ecological effects' of the scheme. I agree with the preliminary identification of important ecological features presented in the scoping report, but advise that the extensive loss of lower value habitats could also result in significant ecological effects. All significant ecological effects will need to be fully mitigated if the proposals are to be in line with relevant planning policies.

Overall, the development is required to provide a net biodiversity gain (policy PLP 30 and NPPF, chapter 15), which should be 'measurable' (NPPF, chapter 15). In order to demonstrate the amount of net gain it is recommended that a biodiversity offsetting approach, and specifically the accounting system based on the DEFRA metric, is used for the development as a whole. Further discussions are likely to be required to determine the precise accounting methodology prior to submission of an application. Further information of biodiversity offsetting is available through the following link: https://www.gov.uk/government/publications/biodiversity-offsetting-information-for-local-authorities

Landscape and Visual Impact

The baseline conditions and assessment methodology is agreed as set out in 8.2 and 8.7 of the Scoping Report. Visual effects and Landscape effects are both to be considered as part of the ES.

It is noted that the applicant intends to make an assessment of the baseline in 2018, during construction and on completion. The applicant also intends to include an assessment without the benefit of effective new planting and 15 years thereafter (in the summer with the benefit of planting). I would question whether 15 years is sufficient given the likely timescales involved in this masterplanned development. The applicant may wish to consider an assessment based on the phased approach associated with the proposed development.

It is noted that a further report was submitted to the Council as an addendum concerning the viewpoints upon which the LVIA would be based. Attached in appendix B is an additional viewpoint which should be considered as part of the LVIA within the ES. I also note that your ZTV diagram indicates that there would be visibility of the site from the west, although there are no viewpoints proposed from the west.

Archaeology and Built Heritage

The methodology proposed is considered acceptable and the baseline conditions are agreed. Please note that there are Grade II listed gateposts on Grange Road opposite the site which are within the 1km study zone.

It is understood that the ES will provide a summary of the baseline assessment results, including archaeology. It is also noted that this may result in further targeted geophysical survey and/or trial trenching. Comments from West Yorkshire Archaeological Advisory Service are included in appendix A which includes a cautionary note concerning the level of survey information you may wish to commission to inform the ES.

In terms of impacts on the setting of heritage assets, we recommend the Environmental Statement includes an assessment of the contribution that setting makes to the significance of each heritage asset and that the impact assessment takes this into account when considering the overall impact on significance.

Noise and Air Quality

Potential noise and vibration impacts during the construction and operational phases to be addressed by the ES are as follows:

- Noise and vibration impacts arising from construction processes affecting noise sensitive receptors;
- Noise impacts to future residents within the Site from existing transport or industrial related noise sources;
- Noise impacts to existing and future residents from changes in traffic associated with the redevelopment; and
- Noise impacts to existing and future receptors from mechanical building services plant and operations of the non-residential buildings associated with the new development.

The proposed methods and guidance appear suitable in assessing all related noise issues.

The submitted Scoping Report refers to local and national guidance and the proposed methodology is agreed.

Please note, both in terms of noise and air quality, there is the potential for highways mitigation measures (such as traffic signals) to alter traffic flows resulting in queuing traffic. That in itself could affect properties in close proximity, especially those closest to the proposed junctions and signals on Leeds Road. This should be considered as part of the ES. It may be covered in a different topic area.

Flood Risk and Water Environment

The relevant chapter of the submitted Scoping Report which includes baseline and methodology information is generally considered acceptable and agreed. However, the applicant should also take into account the finding by RES as part of the Kirklees Local Plan investigation works. The ES should include agreement or disagreement with its findings and an examination of recommendations. A copy of this document is appended in appendix C.

In addition the EIA process should analyse current flood routing based on the current topography. The analysis should then factor in changes to the land levels to accommodate the proposed development and how this may affect overland water flows. This information should inform the ES and the wider drainage strategy for the site.

Ground Conditions

The proposed methodology for dealing with coal mining risks associated with the site is generally accepted. The ES should consider the presence of mine entries as building over the top of, or in close proximity to, entries should be avoided wherever possible, even after they have been capped, in line with the Coal Authority policy.

Matters to be Scoped Out

It is agreed that the following topic areas are unlikely to result in significant environmental effects and are consequently scoped out of the ES:

Wind Microclimate
Electrical Interference
Daylight, Sunlight, Overshadowing, Light Pollution and Solar Glare
Arboriculture
Odour

It is NOT agreed that the following topic areas should be scoped out and are therefore, required to be included within the ES:

Human Health

A proposal can directly affect population and human health, but also have impacts on many different environmental factors that can indirectly affect determinants of health. Of course, this is a significant topic area and one which you may wish to further scope and agree with the Council before considering as part of an ES. However, the scale of the development in this case could lead to significant effects.

The assessment of impacts on health are concerned with the distribution of effects within a population, as different groups are likely to be affected in different ways. It therefore looks at how health and other social inequalities might be improved or exacerbated by the proposal.

Attached in appendix D is Kirklees Council Rapid Health Impact Assessment guidance notes. Please note that this is intended to guide rapid health impact assessments and not comprehensive health impact assessments. However, the topic areas covered in this guidance are all relevant to your proposal and should be considered in the context of EIA. The ES should also focus on the effects of the scheme on access to health services.

Climate Change

As stated in the Scoping Report, the construction and operation of the proposed development would give rise to greenhouse gas emissions. The Scoping Report also states that sustainability measures will inform the design process throughout its development, including climate change and energy usage. However, no information has been provided in terms of the mitigation measures proposed.

In addition, the National Planning Policy Framework emphasises that responding to climate change is central to the economic, social and environmental dimensions of sustainable development. Strategically, the Council promote development that helps to reduce and mitigate climate change, and development which is adapted so that the potential impact from climate change is reduced and to help the transition towards a low carbon economy.

This is all set within the national context of reducing greenhouse gas emissions by at least 80% by 2050. It is widely acknowledged that climate change is one of the greatest challenges facing society.

The way that waste arising from construction and operation is dealt with could result in significant implications for the greenhouse gas emissions generated. The ES should accurately quantify the direct and indirect effects on climate change and consider adaption and vulnerability of those affected. In terms of potential mitigation, offsetting could be considered.

The impact of the project on climate (for example the nature and magnitude of greenhouse gas emissions) and the vulnerability of the project to climate change should be considered in the ES in terms of the likely significant environmental effects. The Council are able to agree the precise scope of this exercise following further consultation from the applicant.

Majors & Minerals Team Leader
Kirklees Metropolitan Borough Council

D. Wordsworth

D. Wordsworth

2.3 Committed Developments

No.	Address	Applicant	Development
1	Land south of Heybeck Lane, Chidswell	C.C. Projects	Outline planning application (all matters reserved except access), for residential development (Use Class C3) of up to 181 dwellings, engineering and site works, demolition of an existing property, landscaping, drainage and other associated infrastructure.
2	Land at Owl Lane, Chidswell	Barratt Homes	Development of 252 new homes, open space, landscaping and associated infrastructure.

Deloitte.
Real Estate

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