

3. EIA Methodology

1. This chapter sets out the scope and methodology adopted in the EIA process. It explains how the scope of the EIA was defined, the baseline assumptions, methods used to assess the environmental effects, and the general criteria used to evaluate their significance.
2. The process of Environmental Impact Assessment in the context of town and country planning in England is governed by the Town and Country Planning (Environmental Impact Assessment) Regulations 2017 (the '2017 Regulations'). These regulations apply to development which is given planning permission under Part III of the Town and Country Planning Act 1990.
3. All further references in this guidance to regulations are to the 2017 Regulations unless otherwise stated. Subject to certain transitional arrangements set out in regulation 76 of the 2017 Regulations, the 2017 regulations revoke the Town and Country Planning (Environmental Impact Assessment) Regulations 2011 (referred to in this guidance as 'the 2011 Regulations').
4. The aim of Environmental Impact Assessment is to:

“protect the environment by ensuring that a local planning authority, when deciding whether to grant planning permission for a project, which is likely to have significant effects on the environment, does so in the full knowledge of the likely significant effects, and takes this into account in the decision making process. The regulations set out a procedure for identifying those projects which should be subject to an Environmental Impact Assessment, and for assessing, consulting and coming to a decision on those projects which are likely to have significant environmental effects.” (NPPG Guidance Paragraph: 002 Reference ID: 4-002-20140306 Revision date: 06 03 2014).

Regulatory Requirements and Good Practice

5. This ES has been prepared to comply with the EIA Regulations. The structure and content of an ES is defined by Regulations 18(3)/(4)/(5) and Schedule 4 of the EIA Regulations, including the information for inclusion in an ES and requirements to ensure completeness and quality.
6. Good practice guidance documents have also been considered when undertaking the EIA including:
 - Planning Practice Guidance ('PPG') – Environmental Impact Assessment¹;
 - Special Report: The State of Environmental Impact Assessment Practice in the UK (IEMA)
 - Guidelines for Environmental Impact Assessment: Institute of Environmental Management and Assessment ('IEMA')
 - European Commission – Environmental Impact Assessment of Projects: Guidance on the Preparation of the Environmental Impact Assessment Report
 - EIA – Shaping and Delivering Quality Development (IEMA)⁵;

- Delivering Proportionate EIA (IEMA); and,
 - Topic specific guidance referred to in each technical chapter of this ES where appropriate.
7. Each technical assessment has followed respective European, national and local planning policy and guidance as appropriate to their discipline.

Design and EIA Interface

8. The EIA has been undertaken in parallel with the design process for the wider Masterplanning and collation of the Planning Application for the Bradley Villa Farm phase of development. The project team specialists have worked closely with the project design team through an iterative process to reduce, or eliminate where possible, adverse environmental effects through the scheme design. Opportunities for enhancement, such as creation of new public open spaces and new tree planting, have also been identified.

Scope of the EIA

9. Given the scale of development proposed, the Applicant is aware that the development would constitute EIA Development and as such, an EIA screening request was not considered necessary.
10. The EIA Regulations require the ES to consider only the 'likely significant environmental effects' of a development. This is reiterated in the UK Government's online PPG, highlighting the expectation that the ES should remain 'proportionate' and focus on the 'main' or 'significant' environmental effects only.
11. The purpose of scoping the EIA is to identify the likely significant environmental issues that are to be considered in the ES. An applicant who is minded to make an application for EIA Development may request a formal scoping opinion from the local planning authority in accordance with Regulation 15 of the EIA Regulations. A formal scoping opinion sets out the local planning authority's opinion as to the information that needs to be provided in the ES, following consultation with statutory consultees.
12. An EIA Scoping Opinion Request was subsequently submitted to Kirklees Council in September 2020 requesting a formal scoping opinion. The purpose of requesting a Scoping Opinion from the Council was to identify the key environmental concerns associated with the project, identify as appropriate initial mitigation measures for incorporation into the scheme design and set out the proposed approach to undertaking the EIA.
13. Scoping effectively starts at the initiation of the EIA and continues through into the detailed technical assessments. The objective of the scoping process is to identify those significant environmental issues which might arise during the construction and operation of the proposed development and which should, therefore, be addressed in more detail as part of the EIA and the resulting ES.

14. The Council provided an EIA Scoping Opinion on the 30th October 2020 (Ref: 2020/20413) which agreed to the general format of the EIA and also provided detailed guidance on the scope of works that would need to be included within the ES and those that had been scoped out. The Scoping Opinion can be viewed at Appendix 3.1 of the ES.

Consultation Process

15. As part of the Scoping Opinion provided by Kirklees Council, advice was sought from statutory environmental consultees on the proposed scope of the EIA. As consultations usually take place after publication of the Scoping Report, the Scoping Responses are taken into consideration during preparation of the EIA.
16. The Scoping Response from the Council encouraged the Applicant to seek further scoping advice from the following statutory bodies and also provided guidance on what should be included to help inform the ES. Each of the technical Chapters (5-16) details what additional specific scoping was undertaken with relevant Council and statutory bodies whilst preparing the ES.
17. A summary of consultation advice received is detailed at **Table 3.1** below alongside information on where this can be found within the ES technical Chapters (5-17).

Table 3.1 – Summary of Consultation Responses received during EIA Scoping:

Chapter(s)	EIA Scoping Advice
Chapter 5: Socio-Economics Chapter	Please ensure assessments of socio-economic impacts are linked to assessments of the sustainability of the proposed development, including in relation to local employment opportunities (at Bradley Business Park and elsewhere), journeys to work, and available social infrastructure. Given the possibility of a new local centre being provided within the allocated site, some assessment of its location and economic effects should be provided, although a sequential test and impact assessment need not be included in the ES. Reference should be made to the council's affordable housing and housing quality policies, the Interim Affordable Housing Policy (2020) and the Strategic Housing Market Assessment (2016). The Scoping Report notes that crime would be assessed. Please ensure this assessment is linked to detailed aspects of design, including lighting, and the need for areas of public realm (including pedestrian routes) to be adequately overlooked and activated, and not lined with side and rear garden fences.

	Although strongly linked to socio-economic considerations, it would be preferable if human health was given its own chapter within the ES. Having regard to Local Plan policy HS47 and the council's Joint Health and Wellbeing Strategy, the cumulative public health impacts of the proposed development and development at other sites will need to be assessed, however opportunities should also be considered – for example, improved pedestrian and cycle connections can be provided between the various development sites, enabling active travel and exercise throughout the area. Co-ordination of facilities across the various sites could also help avoid duplication, and could result in a more comprehensive and varied health, sports and leisure offer. Health-related issues such as inclusive environments, dementia-friendly design, mental health and loneliness, opportunities for inter-generational interaction and the space, design and amenity implications of the Covid-19 epidemic should also be considered. The ES should also consider the effects of the scheme on access to health services.
Chapter 6: Highways	Commentary on the proposed scope of chapter 6 of the ES will be provided once Highways Development Management officers have returned from leave, however in the meantime you are advised that junction assessments to be provided in the Transport Assessment should include the following junctions within Kirklees: • Bradley Bar Roundabout • Bradley Road/Leeds Road/Colne Bridge Road • Cooper Bridge Road/Wakefield Road/Leeds Road Consideration should also be given to providing improved cross-boundary connectivity for pedestrians, cyclists and equestrians via Shepherds Thorn Lane and the existing bridge over the M62. As noted above, an expansion of the Core Walking and Cycling Network is proposed under the Local Plan via Shepherds Thorn Lane. In the context of ongoing cross-boundary Masterplanning work, scope for an improved connection over the motorway (via the bridge at Shepherds Thorn Farm) should be considered. This could provide a

	traffic-free route from Bradley Park to Brighouse, and could potentially join other routes linking Bradley Park to Huddersfield. Walking-to-school routes (including routes across the borough boundary) should be planned for, and the related effects should be assessed in the ES. Please also ensure the ES and Transport Assessment addresses the attached comments of the council's Public Rights of Way team, Highways England and Calderdale Council.
Chapter 7: Landscape and Visual Impact Assessment	The reference (at paragraph 6.30) to the scope of this chapter being agreed with officers is noted. This matter can be discussed at a forthcoming pre-application meeting, to which KC Landscape officers can be invited. Please ensure the Castle Hill Settings Study (Atkins, 2016) is referred to, that the attached comments of KC Landscape and Calderdale Council are addressed, and that the landscape and visual impacts as experienced from locations within Calderdale and by users of the M62 are assessed. Please also be aware of the White Rose Forest initiative, which is promoted by the council and which is intended to greatly increase tree cover within the borough. Proposals for the allocated site will be expected to respond positively to the aims of this initiative. Tree planting to complement nearby ancient woodlands would also be expected. These expectations will have a bearing on the landscape and visual impacts of the development, which will need to be assessed in the ES.
Chapter 8: Ecology	Having regard to the ecological designations listed above, and those in neighbouring Calderdale, please ensure chapter 8 addresses the attached comments of KC Ecology, Natural England, the Environment Agency, Calderdale Council and the Yorkshire Wildlife Trust. A Biodiversity net gain will need to be achieved, and the ES will need to include (or will need to refer to other application documents that include) a thorough assessment of the allocated site's baseline ecological value, biodiversity metric calculation(s), and full details of how the required net

	gain would be achieved. Without this information you would not be able provide a reliable assessment of ecological effects in the ES. A master planned approach (including in relation to sites in Calderdale) to ecological enhancement would be appropriate, given the importance of wildlife corridors and linkages.
Chapter 9: Trees	The scope of the proposed assessment with regard to trees is broadly acceptable, however the attached comments of KC Trees should be addressed in the ES.
Chapters 10 and 11: Archaeology and Heritage	A complete list of heritage assets is not provided at paragraphs 6.62 to 6.73 of the Scoping Report; however you are aware that the barn at Shepherd Thorn Farm is Grade II listed. The attached response from Calderdale Council lists heritage assets that will need to be referred to in the ES. Please also consider whether Anchor Pit Lock (grade II listed, Historic England ref: 1133862) has a relationship with the allocated site that would require assessment for impacts. You are also aware that the western part of the allocated site includes an archaeological site, and that there is much online conjecture regarding the possible route of a Roman road through Bradley. As no above-ground designated heritage assets exist within the allocated site, the assessment in the ES will largely relate to settings. The ES should include an assessment of the contribution that setting makes to the significance of each heritage asset, and should take this into account when considering the overall impact on significance. The attached comments of KC Conservation and Design, West Yorkshire Archaeology Advisory Service, the Council for British Archaeology and Calderdale Council will need to be addressed in the ES in relation to archaeology and heritage. Historic England did not wish to offer any comments on the Scoping Report.
Chapter 12: Air Quality	The impact of the development on the nearest Air Quality Management Area (AQMA 1) within Kirklees (at the junction of the A62 and A644 at Cooper Bridge) will need to be

	considered in the ES. Please see: https://www.kirklees.gov.uk/beta/crime-and-safety/pdf/AirQualityAreaOrder1.pdf Chapter 11 should be cross-referenced with the Transport Assessment, to ensure vehicle movement predictions are consistent across the application submission. Please also ensure that the attached comments of Calderdale Council are addressed, including in relation to the Air Quality Management Area at Brighouse: https://www.calderdale.gov.uk/v2/businesses/pollution/air-quality/air-quality-management-areas-aqma In addition, the air quality assessment for the operational phase impacts should include the cumulative effects from other nearby large sites that are allocated in the Local Plan, together with similar nearby sites within Calderdale. Please also consider the air quality measures being implemented in relation to the Aflex Hose development at Bradley Business Park (application ref: 2018/91432). Otherwise the general proposals and methodology regarding air quality issues are considered to be satisfactory. Up-to-date air quality data for Kirklees can be obtained from Andrew Jameson (x70833 andrew.jameson@kirklees.gov.uk).
Chapter 13: Noise and Vibration	The impact of noise from outdoor sports activities within the development, on both existing and future residential uses, needs to be included in the list of potential noise impacts. Please note that, both in terms of noise and air quality, there is the potential for highways mitigation measures (such as traffic signals, if required) to alter traffic flows resulting in queuing traffic. That in itself could affect properties in close proximity, especially those closest to the proposed/existing junctions and signals. This should be considered in the ES. Otherwise the general proposals and methodology regarding noise and vibration issues are considered to be satisfactory.
Chapter 14: Ground Conditions,	Council-held records indicate that part of the east end of the allocated site is potentially contaminated. With reference to the Scoping Report, the general proposals and methodology regarding land contamination issues are

	considered to be satisfactory. The Coal Authority have been consulted, and they are pleased to see that the chapters proposed for the ES include consideration of ground conditions. The ES should consider the presence of mine entries, given that 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 Coal Authority policy.
Chapter 15: Flood Risk and Drainage	Commentary on the proposed scope will be provided once the Lead Local Flood Authority have reviewed the Scoping Report, however in the meantime reference should be made to the desk top work and site assessment carried out during the preparation of the Local Plan (in particular, see the report by RES Environmental, ref: 543KLE\H1747-H351 rev P1) and in support of the planning application (ref: 2018/93965) relating to part of the allocated site. Of note, the allocated site drains to the same watercourses as other allocated sites in Calderdale do. This water then flows through areas of higher flood risk within Calderdale and Kirklees. Development at the allocated must not be allowed to increase flood risk or limit opportunities for development at other allocated sites, and cumulative flood risk impacts will need to be assessed. The ES should consider flood routing based on the current topography. The analysis should then factor in any changes to the land levels needed to accommodate the proposed development, and consider how this may affect overland water flows. This information should inform the ES and the wider drainage strategy for the site. Early engagement with the Environment Agency is recommended in relation to the above matters, as is early consultation with Highways England, as in some cases drains and watercourses (serving adjacent land) connect with the M62's drainage infrastructure. Flood risk to this nationally-important infrastructure must not be increased.
Chapter 16: Lighting Impact Assessment	The general proposals and methodology regarding artificial lighting issues are considered to be satisfactory insofar as they relate to environmental health considerations. Chapter 15 will also need to consider the effects of lighting on road safety, wildlife and amenity. Please also ensure general

	safety (particularly of pedestrians and cyclists) at night is considered with reference to crime prevention objectives.
Chapter 17: Cumulative Effects Summary / Environmental Mitigation Measures	Chapter 17 should clearly set out what (if any) residual impacts are likely to occur after development and mitigation has been carried out.

Additional Comments in the EIA Scoping Response	Response from Project Team
There is no mention of odour in the Scoping Report. Please note that site allocation HS11 identifies an odour source near the site (the landfill site to the northeast), and requires the submission of an odour assessment. A chapter regarding odour should therefore be included in the ES.	Odour is assessed as part of Chapter 12 Air Quality. An odour Assessment is also submitted as part of the Full Planning Application for the Bradley Villa Farm phase of development.
The Scoping Report does not explicitly state that certain other matters (such as wind and microclimate, electrical interference, solar glare and daylight, sunlight and overshadowing) are to be scoped out of the ES. If you believe the development is unlikely to result in significant environmental effects in relation to those matters, and can therefore be scoped out, explanatory commentary should be submitted for further consideration by the Council.	The wider HS11 site is allocated for residential development in the Local Plan having undergone significant assessment by the council during the Local Plan process. Typical residential development for this site would be houses of two storeys in height. There are no high rise buildings proposed. Generally, detailed assessment relating to wind, microclimate, electrical interference solar glare and daylight, sunlight and overshadowing would be undertaken only for tall buildings that would likely have an effect on these matters. A standard residential development is not considered to cause any impact on these matters, nor have they been flagged as a potential issue when the site was progressed through the Local Plan process. For these reasons, these matters have been scoped out of the ES as they are unlikely to result in any significant environmental effects.

No information is included in the Scoping Report regarding climate change and sustainability, despite the fact that the construction and operational phases of the development will give rise to greenhouse gas emissions, and the relevance of climate change to flood risk and drainage. The NPPF emphasises that responding to climate change is central to the economic, social and environmental dimensions of sustainable development. The council encourages and supports development that helps to reduce and mitigate climate change, that is adaptable so that the potential future impacts of climate change are reduced, and that helps the transition towards a low carbon economy. The Council approved Climate Emergency measures at its meeting of full Council on 16/01/2019, and you may also be aware of the West Yorkshire Combined Authority's pledge for the Leeds City Region to reach net zero carbon emissions by 2038. The ES should accurately quantify the development's direct and indirect effects on climate change and should consider the vulnerability of those affected. In terms of potential mitigation, measures such a district heat network provision or offsetting could be considered. The impact of the development on the climate (for example, given the expected levels of greenhouse gas emissions) and the vulnerability of the development to climate change should be considered in the ES in terms of the likely significant environmental effects.	It is expected that a Sustainability Assessment would be undertaken for each phase of Development full planning application when the full details of development for each phase is known for the Council owned element of the site. The development impact on climate change and sustainability is considered separately as part of each Technical Chapter of the ES where applicable (Chapters 5 –17). A sustainability statement is also submitted as part of the full planning application for the Bradley Villa Farm Phase of Development which sets out sustainability features of the development and Redrow Homes approach to sustainability and climate change.
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18. The EIA Regulations stipulate that an ES should identify, describe and assess the likely significant effects of a development on the environment. Therefore, this ES identifies and

assesses the likely significant effects of the Development in relation to both the construction phase and the completed development.

19. Environmental effects have been evaluated with reference to definitive standards and legislation where available. Where it has not been possible to quantify effects, qualitative assessments have been carried out, based on available knowledge and professional judgement. Where uncertainty exists, this has been noted in the relevant assessment chapter.

Structure of Technical Chapters

20. Each technical chapter of the ES (Chapters 5-16) has been set out broadly in line with Table 3.2 below. Some chapters differ slightly dependent upon the technical assessment specialism however the proposed structure as below is intended as a best practice guide.

Table 3.2: Structure of the Technical Chapters:

Heading	Content
Introduction	Each of the technical chapters begins with an introduction providing context to the EIA completed.
Planning Policy and Legislation	This section includes a summary of policies of relevance to the environmental discipline and explains its purpose in the context of the Development and the ES.
Methodology	This section describes the method and approach employed in the assessment of likely significant effects, the criteria against which the significance has been evaluated, the sources of information used and any technical difficulties encountered. Relevant legislation is also identified.
Baseline Conditions	This section describes and evaluates the baseline environmental conditions i.e. the current situation and anticipated changes over time assuming the Site remains undeveloped.
Assessment of Effects, Mitigation and Residual Effects	This section identifies the likely significant effects on the environment resulting from the Development during construction and operational phases. This section describes the measures which would be implemented to mitigate against potential adverse impacts. Where possible, enhancement measures have also been proposed. The residual effects, i.e. the remaining effects of the Development assuming implementation of the proposed mitigation measures, have been estimated and presented.

Cumulative Effects	This section identifies the cumulative effects of the Proposed Development from Effects arising from each environmental Chapter when considered together alongside the cumulative developments listed further in this Chapter of the ES.
Assumptions and Limitations	This Section sets out the limitations of the assessment works undertaken and details any assumptions that have been made and justification for this.
Summary and Conclusions	Each technical chapter concludes with a brief summary outlining the potential residual effects for the construction phase (short/medium) and operation (medium/long-term) phase of the Development.

Determining Significance and Magnitude

21. It is broadly accepted that significance reflects the relationship between two factors:
 - The actual change taking place to the environment (i.e. the magnitude or severity of an effect); and
 - The sensitivity, importance or value of the affected resource or receptor
22. Significance of an environmental effect is determined by the interaction of magnitude and sensitivity, whereby the impacts can be beneficial or adverse.
23. During EIA Scoping, the Council requested that the assessment of the significance of effects should include the geographical extent of each likely effect in each technical Chapter of the ES. This would be determined by several factors, including the physical extent of each intervention, the distance over which effects would be significant, and the presence and type of pathways along which impacts may be spread.
24. Table 3.3 below shows how magnitude and sensitivity interact to derive effect significance.
25. The magnitude of an effect is often quantifiable in terms of, for example, extent of land take, or predicted change in noise levels. A methodology for determining the scale, or magnitude, of effect is set out in Table 3.4 below.

Table 3.3 – Methodology for Assessing Significance

Magnitude	High	Medium	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 Adverse/Beneficial - Negligible
Negligible	Negligible	Negligible	Negligible

Table 3.4 – Methodology for assessing Magnitude

Magnitude of Impact	Criteria for Assessing Effect
Major	Total loss or major/substantial alteration to key elements/features of the baseline 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.

Sensitivity

26. The sensitivity, importance or value of the resource or receptor is normally derived from:

- Legislative controls;
- Designated status within the land use planning system;
- The number of individual receptors such as residents;
- An empirical assessment on the basis of characteristics such as rarity or condition; and/or
- Ability of the receptor to absorb change.

27. The sensitivity of a receptor is based on the relative importance of the receptor using the scale in Table 3.5 below

Table 3.5 - Methodology for Assessing 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.

28. The sensitivity, magnitude and significance criteria detailed above has been provided as a guide for technical specialists to assess impact significance. Where discipline specific methodology has been applied that differs from the generic criteria above, this has been clearly explained within the given chapter under the heading 'Methodology'.

Mitigation

29. Any adverse environmental effects have been considered for mitigation at the design stage and, where practicable, specific measures have been put forward. These are detailed in each technical chapter of the ES (chapters 5-16).
30. Where the effectiveness of the mitigation proposed has been considered uncertain, or where it depends upon assumptions of operating procedures, data and/or professional judgement has been introduced to support these assumptions.
31. Mitigation to be implemented during the operational phase for each phase of development is expected to be secured through planning conditions and obligations attached to each planning permission.

Cumulative Effects

32. Schedule 4 of the EIA Regulations states that an ES should include a description of the likely significant effects of the development on the environment resulting from the cumulation of effects with other existing and/or approved projects, taking into account any existing environmental problems relating to areas of particular environmental importance likely to be affected or the use of natural resources.
33. The cumulative impact assessment has been informed by NPPG Guidance which states:

"Each application should be considered on its own merits. There are occasions, however, when other existing or approved development may be relevant in determining whether

significant effects are likely as a consequence of a proposed development. The local planning authorities should always have regard to the possible cumulative effects arising from any existing or approved development.” (Paragraph: 024 Reference ID: 4-024-20170728 Revision date: 28 07 2017).

34. Allocated site HS11 is located within an area expected to undergo significant change in the coming years as a result of developments at allocated sites (proposed and adopted) in both Kirklees and Calderdale.
35. Cumulative development sites were scoped with the Council during the EIA Scoping process and the Council provided a list of eight sites within proximity to the HS11 Allocation site that should be assessed within the ES for cumulative impact.
36. The cumulative impact of these developments are considered in each of the Technical Chapters 5-16 of the ES and in the Concluding Chapter 17 for the following identified sites:
 1. HS11 - 105 dwellings approved 04/09/2020 on land at Tithe House Way under application Ref: 2018/93965).
 2. HS12 – Land north and west of Gernhill Avenue, Fixby. Housing allocation (indicative capacity: 377 units). Planning permission granted for 252 units under application ref: 2018/92055.
 3. ES1 – Land at Bradley Business Park (Aflex Hose site), Dyson Wood Way, Bradley. Employment allocation (indicative capacity: 15,155sqm floorspace). Planning permission granted for 19,202sqm B1(a), B1(b), B2 and B8 floorspace under application ref: 2018/91432.
 4. HS13 – Land to the east of Netheroyd Hill Road, Cowcliffe. Housing allocation (indicative capacity: 68 units).
 5. HS14 – Land north of Ashbrow Road, Brackenhall. Housing allocation (indicative capacity: 162 units). Planning permission granted for 161 units under application ref: 2019/92940.
 6. ES9 – Former Cooper Bridge Waste Water Treatment Works, Leeds Road. Employment allocation (indicative capacity: 14,910sqm floorspace).
 7. MXS6 – Land at Slipper Lane and Leeds Road, Mirfield. Mixed use allocation (indicative capacities: 166 residential units and 17,234sqm employment floorspace). Various permissions granted for residential and employment development.
 8. Garden Suburb Proposed Allocation Site Ref: LP1451 in Calderdale Council Local Authority Area which proposes circa 1,257 dwellings and associated infrastructure

Assumptions and Limitations

37. The principal assumptions that have been made and any limitations that have been identified, in preparing this ES are set out below. Assumptions relevant to specific topics have been made in the appropriate technical chapters based on the following:

- All of the principal existing land uses surrounding the Application Site will remain, except where development proposals have already been granted planning consent;
- Baseline conditions have been established from a variety of sources, however due to the dynamic nature of certain aspects of the environment, existing conditions could change during the construction and operation of the Scheme;
- Information received from third parties is complete and up to date;
- The design, construction and completed scheme will satisfy minimum environmental standards, consistent with contemporary legislation, practice and knowledge;
- Significant environmental effects have been assessed using development parameters;
- Conditions will be attached to planning permission as necessary that will control disturbance during the construction works;
- Necessary off-site services infrastructure for the Development will be provided by statutory undertakers; and
- The planning permission, when granted for each stage of development, will contain conditions that will be sufficient to limit the Development to what has been assessed.

Summary and Conclusions

38. This Chapter of the ES sets out a best practice guidance on how the ES should be structured to provide a robust assessment of environmental impact in accordance with the 2017 EIA Regulations.

39. The sensitivity, magnitude and significance criteria has been provided as a guide for technical specialists to assess impact significance. Where discipline specific methodology has been applied that differs from the generic criteria above, this has been clearly explained within the given chapter under the heading 'Methodology'.

40. The technical studies undertaken within the ES (Chapters 5 – 17) have been prepared by qualified technical consultants in their individual specialisms and have been progressed in a transparent, impartial and unbiased way with equal weight attached, as appropriate, to beneficial and adverse effects.

41. Where possible, this has been based upon quantitative and accepted criteria together with the use of value judgements and expert interpretations.

References

- Department for Communities and Local Government (DCLG), 2015. Planning Practice Guidance -
- Environmental Impact Assessment. ID 4, updated: April 2015. Available online at: <http://planningguidance.planningportal.gov.uk/blog/guidance/environmental-impact-assessment/>
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