

# STRIDE TREGLOWN



## Environmental Statement: Chapter 2 – EIA Process

Ellel Holiday Village, Lancaster

*Ellel*

Ellel Holiday Village LLP

## 2. Environmental Impact Assessment Process

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### 2.1. Introduction

- 2.1.1 This chapter of the ES sets out the overall approach and methodology for assessing the environmental effects of the proposed development.
- 2.1.2 The EIA methodology is in accordance with applicable legislation and guidance and has been tailored to each technical discipline of the EIA (e.g. air quality, ecology, cultural heritage and archaeology etc.) using industry standard methods and criteria.
- 2.1.3 Further details on how the assessment methodology has been applied to each technical discipline are presented within the technical chapters of this ES (Technical Chapters 6-11).

### 2.2. The Requirement for EIA

- 2.2.1 Development which falls within the scope of the Town and Country Planning (Environmental Impact Assessment) Regulations 2017 (as amended) (hereafter referred to as the 'EIA Regulations') is defined as 'EIA Development'.
- 2.2.2 The requirement for EIA is based on the likelihood of significant environmental effects arising from the proposed development and is either mandatory or conditional depending on the classification of the development. EIA developments are divided into Schedule 1 and Schedule 2 developments under the EIA Regulations.
- 2.2.3 Schedule 1 developments constitute those developments that are deemed to have significant effects on the environment, such as major chemical or petrochemical projects for which EIA is mandatory. For developments which fall under Schedule 2, the need for an EIA is determined on the basis of set criteria, as follows:
- It is within one of the classes of development stated in Schedule 2; AND
  - EITHER it meets or exceeds the applicable threshold criteria for that class of development in Schedule 2; OR the development is to be carried out partly or wholly within a sensitive area (as defined in Part 1 of the EIA Regulations); AND
  - It is likely to have significant effects on the environment by virtue of factors such as its nature, size or location.
- 2.2.4 Due to the scale and nature of the proposed development, there is considered to be the potential for likely significant environmental impacts which require environmental assessment and determination of mitigation measures. In this instance, the local planning authority (LPA), Lancaster City Council (LCC), determined that the proposed development is considered to be an 'EIA Development' under the provisions of the EIA Regulations.

### 2.3. The EIA Process

- 2.3.1 EIA is the process of identifying, evaluating and, where possible, mitigating the likely significant environmental effects of a proposed development. The process promotes the early identification and evaluation of potential significant environmental effects of a proposed development and enables appropriate mitigation (i.e. measures to avoid, prevent, reduce or offset likely significant environmental effects) to be identified and incorporated into the design of a development prior to the submission of the outline planning application.

2.3.2 The results of the EIA also ensure that decision makers, statutory consultees and other consultees are aware of a development's likely environmental effects. They are taken into account by the LPA prior to the determination of an application for planning consent.

## 2.4. Environmental Baseline

2.4.1 To establish the baseline, a study area that is appropriate for each environmental discipline is identified. Each study area will consider the surrounding context and the likely scale and range of potential significant effects.

2.4.2 Data has been collected from a combination of sources for each environmental discipline in respect of their study areas, in order to inform each assessment, including:

- Identification of sensitive environmental receptors;
- Physical surveys (including site walkovers);
- Desk-based studies, including data from statutory and non-statutory consultees; and
- Monitoring and modelling (including air quality and transport)

## 2.5. Scoping of Issues

2.5.1 Schedule 4 of the EIA Regulations focuses on the "main" or "significant" environmental effects of which a development is likely to give rise to. The ES should be proportionate and not be any longer than is necessary to properly assess those effects. The EIA process has scoped out a number of topics through the formal scoping process, in agreement with the LPA.

2.5.2 An EIA Scoping Letter was submitted to LCC in January 2020 and LCC's formal Scoping Opinion was received in April 2020. The formal scoping process confirmed both the scope of the EIA and the potential environmental effects to be the focus of the EIA.

2.5.3 In accordance with the EIA regulations, the following bodies were consulted. Not all consultees provided comment for input into the scoping exercise.

- Lancashire County Council Public Rights of Way
- Ramblers Association
- British Horse Society
- Historic England
- Conservation Officer
- Lancashire County Archaeological Advisory Service;
- Ellel Parish Council
- Thunham Parish Council
- Wyre Parish Council
- Environment Agency
- Lead Local Flood Authority
- Greater Manchester Ecology Unit

- Environmental Health
- United utilities
- City Council Planning policy
- Forest of Bowland Area of Outstanding Natural Beauty Office
- Royal Society for Protection of Birds
- City Council Tree Protection Officer
- City Council Public Realm Officer
- Natural England
- Canal and Rivers Trust
- County Highways
- Highways England
- Marine Management

2.5.4 Arising from the consultation responses at Appendix 2, the following topics were identified for investigation and assessment as part of this Scoping Process;

- Highway Impacts;
- Landscape and Visual Impacts;
- Air Quality;
- Ecological Issues (Protected Species, Impact on the Morecambe Bay SPA and SAC);
- Access and Recreation;
- Contaminated Land;
- Noise;
- Heritage related matters;
- Tree Protection Measures;
- Public Open Space Provision; and
- Flooding and Drainage.

## 2.6. Basis of Assessment

2.6.1 The Applicant (Ellel Holiday Villages LLP) is seeking to obtain outline planning permission for the proposed development of a new tourism/leisure destination in Galgate, Lancaster.

2.6.2 The planning application will be supported by the following documentation;

- Forms and notices:

- Design and Access Statement;
- Agricultural Land Classification Report;
- Contaminated Land Assessment (Phases 1 and 2);
- Energy Statement;
- Economic Benefits Report;
- Employment and Skills Plan;
- Health Impact Assessment;
- Noise and Vibration Survey;
- Foul and Surface Water Drainage;
- Flood Risk Assessment;
- Sustainable Drainage Assessment;
- Arboricultural Impact Assessment;
- Statement of Community Involvement; and
- Retail Impact Assessment.

2.6.3 The assessments contained within this Environmental Statement are based on the scheme information and architectural drawings submitted in support of the planning application. Details of how the proposed development has responded to environmental considerations are set out in Chapter 4: Consideration of Alternatives and within the Planning Statement.

## **2.7. Assessment of Effects and Determining Significance**

2.7.1 Schedule 4 of the EIA Regulations requires a description of the likely significant effects to be provided in the ES. However, it should be noted that in the context of the general methodology used for this assessment, the terms ‘impact’ and ‘effect’ are distinctly different, whereby the ‘impacts’ of the proposed development may or may not result in significant environmental ‘effects’ depending on the sensitivity or value of the receptor or resource.

2.7.2 Methodologies for each environmental discipline are presented within the subsequent technical chapters of this ES (Technical Chapters 6 - 11). These approaches are based upon good practice guidance and standards which are specific to each discipline, in addition to the outcomes of pre-application consultation. However, the approach to assessing effects and determining significance is broadly similar for all environmental disciplines, with some variation in the descriptions of assessment criteria.

2.7.3 For each discipline, the assessment of significance has been informed by the sensitivity of the existing baseline environmental conditions (i.e. the receptors or resources within the study area for each discipline) and the magnitude of the change to these conditions which result from the construction and operational phases of the proposed development. The classification of effects requires consideration of:

- Whether the impacts are beneficial or adverse;

- Impact duration (short, medium or long-term);
- Impact nature (direct or indirect, reversible or irreversible);
- Whether the impacts are permanent or temporary;
- The extent and complexity of the impact; and
- Whether a particular impact occurs in isolation or is cumulative or interactive with another impact.

2.7.4 For each environmental discipline that utilises this approach, either fully or in part, the categories of resource/receptor sensitivity and magnitude of impact will be described and defined. The following sections provide the generic criteria for the definition of resource/receptor sensitivity (see Table 2-1), magnitude of impacts (see Table 2-2) and significance of effect (see Table 2-3). Environmental topics will broadly follow the approach set out in the following sections and any deviations from this approach are explained and justified where appropriate.

## 2.8. Sensitivity of Value or Receptor / Resource

2.8.1 Table 2-1 describes and defines the generic guidelines for the assessment of sensitivity. In each of the following technical chapters of this ES (Technical Chapters 6 – 11), the criteria for defining sensitivity will be explained with reference to each particular environmental discipline.

**Table 2 -1: Generic guidelines for the assessment of sensitivity**

Sensitivity / Value	Guidelines
High	<p>Value: Feature/receptor possesses key characteristics which contribute significantly to the distinctiveness, rarity and character of the site/receptor (e.g. designated features of international/national importance, such as World Heritage Sites, Areas of Outstanding Natural Beauty (AONB), Special Areas of Conservation (SACs), Special Protection Area (SPAs), Ramsar sites, Sites of Special Scientific Interest (SSSIs), Scheduled Ancient Monuments, Air Quality Management Areas (AQMA), Grade I and Grade II* Listed Buildings).</p> <p>Sensitivity: Feature/receptor has a very low capacity to accommodate the proposed form of change.</p>
Medium	<p>Value: Feature/receptor possesses key characteristics which contributes significantly to the distinctiveness and character of the site/receptor (e.g. designated features of regional or county importance, such as County Wildlife Sites (CWSs), Local Biodiversity Action Plans (BAP), Conservation Areas, Grade II Listed Buildings, Heritage Coast and Special Landscape Areas etc.).</p> <p>Sensitivity: Feature/receptor has a low capacity to accommodate the proposed form of change.</p>
Low	<p>Value: Feature/receptor only possesses characteristics which are locally significant. Feature/receptor not designated or only designated at a district or local level (e.g. local nature reserve, locally Listed Buildings).</p> <p>Sensitivity: Feature/receptor has some tolerance to accommodate the proposed change.</p>

Very Low	Value: Feature/receptor characteristics do not make a significant contribution to local character or distinctiveness. Feature/receptor is not designated.  Sensitivity: Feature/receptor is generally tolerant and can accommodate the proposed change.
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## 2.9. Magnitude of Impact

2.9.1 Table 2-2 sets out the generic guidelines for the assessment of magnitude. In each of the following technical chapters of the ES (Technical Chapters 6 – 11), the criteria for determining magnitude will be explained with reference to each particular environmental discipline.

**Table 2 -2: Generic guidelines for assessment of magnitude**

Sensitivity / Value	Guidelines
High	Large-scale changes over the whole development area to key characteristics or features of the particular environmental aspect's character or distinctiveness.
Medium	Medium-scale changes over the majority of the development area to key characteristics or features of the particular environmental aspect's character or distinctiveness.
Low	Noticeable but small-scale changes over part of the development area, to key characteristics or features of the particular environmental aspect's character or distinctiveness.
Very Low	Very small-scale or barely discernible changes, over a small part of the development area, to key characteristics or features of the particular environmental aspect's character or distinctiveness.

## 2.10. Significance of Effects

2.10.1 A combination of the sensitivity/value of the receptors or resources and the magnitude of potential impacts will be used to determine the significance of effects. Table 2-3 illustrates the matrix used for the classification of these effects.

**Table 2-3: Classification (scale) of effects**

		Magnitude of Impact				
		Very High	High	Medium	Low	Very Low
Receptor Sensitivity						
	Very High	Major	Major	Moderate	Minor	Minor

	High	Major	Moderate	Minor	Minor	Negligible
	Medium	Moderate	Minor	Minor	Negligible	Negligible
	Low	Minor	Minor	Negligible	Negligible	Negligible
	Very Low	Minor	Negligible	Negligible	Negligible	Negligible

2.10.2 It should be noted that this general approach is not necessarily the definitive matrix to be used for each environmental discipline. Therefore, in each of the following technical chapters of the ES (Technical Chapters 6 – 11), the significance of effects will be explained with reference to each particular environmental discipline.

2.10.3 The significance of effects arising from the proposed development will be reported using a seven-point scale, as follows:

- Major Adverse;
- Moderate Adverse;
- Minor Adverse;
- Negligible;
- Minor Beneficial;
- Moderate Beneficial; and
- Major Beneficial.

2.10.4 Potential effects will be separated into two types based on the different phases of the development:

- Construction Effects: These are effects that begin and end during the construction phase of the proposed development, for example by construction traffic, noise and vibration, dust generation, site runoff, and the visual intrusion of on-site machinery.
- Operational Effects: These are the long-term effects that occur once the proposed development has been completed and is in operational use.

2.10.5 Following the classification of an effect using this methodology, a clear statement will then be made as to whether that effect is 'significant' or 'not significant'. As a general rule, 'major' and 'moderate' effects are considered to be significant, whilst 'minor' and 'negligible' effects are considered to be not significant. However, professional judgment will also be applied where necessary.

## 2.11. Mitigation and Monitoring

2.11.1 Each technical chapter of the ES will also include a description of the mitigation measures to avoid, prevent, reduce and where possible, offset any significant environmental effects.

2.11.2 Two types of mitigation measures will be applied in the assessments and are described as such within each technical chapter. These are:

- Embedded (standard) mitigation: This includes modifications to the location or design of the proposed development made during the pre-application phase that are an inherent part of the design for which planning consent is sought (e.g. reduction in the height of a building to reduce its visual impact or identifying a key habitat that should remain unaffected by the proposed development and incorporated into the design). Embedded mitigation also refers to industry standard mitigation which would be applied during the construction phase and will be detailed within a Construction Environment and Management Plan (CEMP) should outline planning permission be granted; and
- Additional (non-standard) Mitigation: This includes any further measures or monitoring regimes required in order to provide effective mitigation against any significant environmental effects, therefore going beyond standard good practice guidance. These may be imposed as part of the planning consent (e.g. commitment to implement construction monitoring or enhancing local habitats).

2.11.3 The 'standard' and 'non-standard' mitigation measures and monitoring regimes for each environmental discipline are described in each of the technical chapters of the ES (Technical Chapters 6 – 11), where necessary.

## 2.12. Inter-relationships and Cumulative Effects

2.12.1 The approach to the consideration of cumulative effects arising from the proposed development will be 'proportionate' for each technical discipline included within the ES, as per the requirements of Regulation 26(3) of the EIA Regulations.

2.12.2 The assessment of cumulative effects arising from the proposed development in-combination with other developments (inter-project effects) will primarily constitute a desk-top study of planning documents considered relevant to the assessment. The focus of the desk-top study is the collection of information relating to the background of relevant projects, their expected timelines and likely environmental impacts. As such, the study area for the potential 'interdevelopmental' cumulative effects will consider all major developments within a defined radius of the proposed development, based upon the potential impacts on all sensitive environmental receptors and resources.

2.12.3 The main source of data for the intra-project cumulative effects assessment will be the outcomes and information obtained from each technical discipline assessments. The assessment will include a list of those developments considered likely to result in a cumulative effect together with the proposed development.

2.12.4 The criteria for determining the significance of any cumulative effect will be based upon:

- The duration of effect, i.e. will it be temporary or permanent;
- The extent of effect, e.g. the geographical area of an effect;
- The type of effect, e.g. whether additive or synergistic;
- The frequency of the effect;
- The 'value' and resilience of the receptor affected; and
- The likely success of mitigation.

## 2.13. Schemes for Inclusion in the Cumulative Assessment

2.13.1 On the basis of their scale and proximity to the proposed development, the following Local Plan site allocations in Table 2-4 will be considered within the cumulative assessment. For all environmental disciplines scoped into the EIA, consideration will be given to the potential for cumulative effects to the extent possible, based on publicly available information at the time of undertaking the assessment.

**Table 2-4: Cumulative Schemes**

Local plan Site Allocation Ref:	Previous SHLAA Ref	Site Name	Allocation type
780	84	Galgate Mill	Rural Employment Site
<Null>	722	Galgate Mill	Development Opportunity Site
334	341	Bailrigg Garden Village - Whinney Carr and Bailrigg Lane	Strategic Housing
643	654	Land south of Marsh Lane	Rural Housing
824	N/A	Junction 33 Auction Market	Agricultural employment Site
671	682	Ridge Farm/Cuckoo Farm	Strategic Housing
251	257	Leisure Park/Auction Mart, Wyresdale Road	Urban Housing
739	N/A	Lancaster University Innovation Campus	General Employment Site
321	328	Grab Lane	Urban Housing
710	721	North Lancaster Strategic Site	Strategic Housing
739	N/A	Lancaster University Innovation Campus	General Employment Site

2.13.2 An outline planning application is currently being considered by LCC on land to the north east of Bailrigg Lane for up to 680 dwellings. Whilst this application has yet to be determined, it is included within the cumulative assessment for the purposes of this ES.

2.13.3 This list was agreed with the Local Planning Authority (LPA). See Technical Chapters 6 – 11 for further details related to specialist disciplines.

## 2.14. Residual Effects

2.14.1 The ES will report on the anticipated effects of the proposed development following the implementation of ‘standard’ and ‘non-standard’ mitigation measures. These are known as ‘residual effects’. A clear statement will be made as to whether the residual effects are ‘significant’ or ‘not significant’. Further detail is provided in Technical Chapters 6 – 11.

## 2.15. Consultation

2.15.1 The Applicant is committed to facilitating stakeholder and community engagement for the proposed development. Consultation with key local stakeholders and the local community has been undertaken as part of the pre-application process.

2.15.2 A list of consultation events and a list of key design evolutions following consultation can be found in Chapter 3: Consideration of Alternatives. Further information can also be found within the Statement of Community Involvement submitted with the planning application.

### Statutory Consultation

2.15.3 The applicants have engaged with the Local Planning Authority, Local Highway Authority and Highways England prior to the submission of this planning application. They had previously engaged in the Local Plan process, having previously advanced Home Farm, Ellel as a potential Strategic Site allocation in the Lancaster District Local Plan (Part One) Strategic Policies and Land Allocations.

2.15.4 The pre-application consultations with the Local Planning Authority has afforded the applicants to engage with officers but also representatives of Ellel Parish Council and local District Councillors, through the Council’s Member Engagement Forum. Galgate Flood Action Group also attended the most recent meeting in August 2020.

## 2.16. Assumptions and Limitations

2.16.1 A number of general assumptions have been made during the EIA, which are set out below:

- The baseline is considered to be the existing site as it stands at the time of writing the ES, with the buildings on site still in place but not including the temporary site offices occupying the site which are associated with a nearby construction project;
- The principal land uses adjacent to the site remain as they are at the time of the ES submission, except in cases where planning permission has already been granted for adjacent development. In this instance, it is assumed that approved developments will take place;
- It is assumed that the cumulative schemes take place as per the allocation descriptions;
- Information provided by third parties, including publicly available information and databases, is correct at the time of publication;
- The site or adjacent properties will not be the subject of any unforeseen events of a severe nature; and
- The programme of works for the construction will be set out within a CEMP which will be submitted as a discharge of a ‘pre-commencement’ condition should outline planning permission be granted.