



Planning
Inspectorate

SCOPING OPINION:

Proposed Intermodal Logistics Park North

Case Reference: TR0510001

Adopted by the Planning Inspectorate (on behalf of the Secretary of State)
pursuant to Regulation 10 of The Infrastructure Planning (Environmental
Impact Assessment) Regulations 2017

12 December 2024

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1. INTRODUCTION

- 1.0.1 On 04 November 2024, the Planning Inspectorate (the Inspectorate) received an application for a Scoping Opinion from Intermodal Logistics Park North Limited (the Applicant) under Regulation 10 of the Infrastructure Planning (Environmental Impact Assessment) Regulations 2017 (the EIA Regulations) for the proposed Intermodal Logistics Park North (the Proposed Development). The Applicant notified the Secretary of State (SoS) under Regulation 8(1)(b) of those regulations that they propose to provide an Environmental Statement (ES) in respect of the Proposed Development and by virtue of Regulation 6(2)(a), the Proposed Development is 'EIA development'.
- 1.0.2 The Applicant provided the necessary information to inform a request under EIA Regulation 10(3) in the form of a Scoping Report, available from:

<https://nsip-documents.planninginspectorate.gov.uk/published-documents/TR0510001-000004-TR051001%20-%20Scoping%20Report.pdf>
- 1.0.3 This document is the Scoping Opinion (the Opinion) adopted by the Inspectorate on behalf of the SoS. This Opinion is made on the basis of the information provided in the Scoping Report, reflecting the Proposed Development as currently described by the Applicant. This Opinion should be read in conjunction with the Applicant's Scoping Report.
- 1.0.4 The Inspectorate has set out in the following sections of this Opinion where it has / has not agreed to scope out certain aspects / matters on the basis of the information provided as part of the Scoping Report. The Inspectorate is content that the receipt of this Scoping Opinion should not prevent the Applicant from subsequently agreeing with the relevant consultation bodies to scope such aspects / matters out of the ES, where further evidence has been provided to justify this approach. However, in order to demonstrate that the aspects / matters have been appropriately addressed, the ES should explain the reasoning for scoping them out and justify the approach taken.
- 1.0.5 Before adopting this Opinion, the Inspectorate has consulted the 'consultation bodies' listed in Appendix 1 in accordance with EIA Regulation 10(6). A list of those consultation bodies who replied within the statutory timeframe (along with copies of their comments) is provided in Appendix 2. These comments have been taken into account in the preparation of this Opinion.
- 1.0.6 The Inspectorate has published a series of advice pages, including [Advice Note 7: Environmental Impact Assessment: Preliminary Environmental Information, Screening and Scoping \(AN7\)](#). AN7 and its annexes provide guidance on EIA processes during the pre-application stages and advice to support applicants in the preparation of their ES.
- 1.0.7 Applicants should have particular regard to the standing advice in AN7, alongside other advice notes on the Planning Act 2008 (PA2008) process, available from:

<https://www.gov.uk/government/collections/national-infrastructure-planning-advice-notes>

- 1.0.8 This Opinion should not be construed as implying that the Inspectorate agrees with the information or comments provided by the Applicant in their request for an opinion from the Inspectorate. In particular, comments from the Inspectorate in this Opinion are without prejudice to any later decisions taken (e.g. on formal submission of the application) that any development identified by the Applicant is necessarily to be treated as part of a Nationally Significant Infrastructure Project (NSIP) or Associated Development or development that does not require development consent.

2. OVERARCHING COMMENTS

2.0 Description of the Proposed Development

(Scoping Report Sections 2 and 3)

| ID | Ref | Description | Inspectorate's comments |
|-----|---------------------------------------|--|--|
| 201 | Paragraph 3.2 Paragraph 3.10 | Project elements and options | <p>In addition to the rail freight infrastructure, the Scoping Report lists other elements such as energy infrastructure, battery storage, a Combined Heat and Power Plant (CHP), and photovoltaics that are not yet confirmed but may form part of the Proposed Development.</p> <p>The Inspectorate expects that at the point an application is made, the description of the Proposed Development will be sufficiently detailed to include the design, size, capacity, technology, and locations of the different elements of the Proposed Development. Where details are not yet known, the assumptions applied to the impact assessment in relation to these aspects should also be set out. Where flexibility is sought, the ES should clearly set out and justify the maximum design parameters that would apply for each option assessed and how these have been used to inform an adequate assessment in the ES.</p> <p>The Applicant should nevertheless make every attempt to narrow the range of options within the ES, explain clearly which elements of the Proposed Development have yet to be finalised and provide the reasons. At the time of application, any Proposed Development parameters should not be so wide-ranging as to represent effectively different developments.</p> <p>It should be noted that if the Proposed Development materially changes prior to submission of the Development Consent Order (DCO) application, the Applicant may wish to consider requesting a new Scoping Opinion.</p> |
| 202 | Figure 1.1 Paragraphs 3.9 and 3.25 | Parkside West Scheme Parkside Link Road | <p>An area of redevelopment known as Parkside West and the Parkside Link Road are both identified within the Scoping Report project description as potential or future developments overlapping (temporally and spatially) with the Proposed Development. The Parkside Link</p> |

| ID | Ref | Description | Inspectorate's comments |
|-----|----------------|---------------------------------------|--|
| | | | <p>Road is identified as the main construction access to the Proposed Development and is stated to be currently under construction.</p> <p>The ES should confirm the status and location of these developments and be clear how both developments have been taken into account within the aspect assessments and/ or as projects considered in the cumulative effects assessment.</p> |
| 203 | Paragraph 3.16 | Parameters | <p>The Scoping Report refers to a maximum building height of 35m, but no minimum building height. No maximum or minimum height is given for the lower buildings that are proposed to be in zones of greatest sensitivity and no depths of foundations are provided. This should be set out and used to inform the assessment in the ES. Measurement units should be expressed in relation to the existing ground levels.</p> |
| 204 | n/a | Operation of the Proposed Development | <p>The Scoping Report provides few details of the operation of the Proposed Development, which has limited the Inspectorate's ability to comment on this matter. The ES should provide sufficient information on the operation of the Proposed Development to provide certainty on the environmental effects and mitigation requirements. This should include, but not necessarily be limited to:</p> <ul style="list-style-type: none"> • operational requirements including the main characteristics of the freight process; • site access; • expected train movements; • loading and unloading activities; • operational working hours; • phasing, if relevant; • working hours; employment and workforce requirements; and • energy use. |

| ID | Ref | Description | Inspectorate's comments |
|-----|-----|---------------------------------|--|
| | | | Where uncertainty remains, the ES should describe how the parameters for the assessment have been developed and how this has informed the assessment of effects. |
| 205 | n/a | Transport and traffic | The Scoping Report identifies potential for offsite highway works to be required that have not yet been defined. The ES should therefore describe how the spatial scope of the assessment for operational transport and traffic has been derived and demonstrate how the scope of the assessment has been discussed and where possible agreed with relevant consultation bodies. |
| 206 | n/a | Project description consistency | <p>The Inspectorate notes some aspect chapters contain additional information on the description of the proposed development (such as references to piling) that is not included within Scoping Report Chapter 3.</p> <p>A consistent project description that is used to underpin all the aspect assessments should be provided in the ES.</p> |

2.1 EIA Methodology and Scope of Assessment

(Scoping Report Section 4)

| ID | Ref | Description | Inspectorate's comments |
|------|---------------------------|------------------------------------|--|
| 21.1 | Paragraph 2.9 to 2.19 | Site and environmental constraints | <p>The Inspectorate notes that there are environmental constraints, such as designated wildlife and heritage sites, either within the site or directly adjacent to it. The site also has underlying features such as a Principal Aquifer and falls within a Nature Improvement Area and Core Biodiversity Area identified by St Helens Borough Council.</p> <p>The ES should demonstrate how the mitigation hierarchy has been applied in the design and consideration of alternatives.</p> |
| 212 | Table 4.4 | Neutral effects | <p>The ES should define the term 'neutral' in relation to magnitude of effects and provide a justification for whether these effects are significant or not significant.</p> |
| 213 | Paragraphs 4.3.1 to 4.3.4 | Maximum Design Scenario (MDS) | <p>Where flexibility is retained (please see ID 2.1.5 of this Opinion), any Limits of Deviation should also be set out in the ES and secured within the DCO.</p> |
| 214 | Paragraph 4.10 | Decommissioning | <p>The Scoping Report notes that there are no plans to decommission the Proposed Development and that decommissioning effects would not therefore be considered within the ES.</p> <p>The Inspectorate notes however that the Proposed Development may include provision of energy infrastructure such as photovoltaics and battery storage. There is no information in the Scoping Report to indicate the lifespan of these facilities and whether they would be decommissioned or whether works would be required to extend their operational life at any point.</p> |

| ID | Ref | Description | Inspectorate's comments |
|-----|-----------------|---|---|
| | | | <p>The Inspectorate does not therefore agree that decommissioning effects can be scoped out of the assessment at this stage. The ES should provide a proportionate description of all decommissioning activities or describe those activities required to extend operational life, where these are relevant. Where significant effects are likely to occur as a result of such works, these should be assessed in the ES.</p> |
| 215 | Paragraph 4.31 | Maximum Design Parameters / Flexibility | <p>The Inspectorate also notes the Applicant's intention to apply a Rochdale Envelope approach, define a 'Maximum Design Scenario' (MDS) and retain optionality within the design of the Proposed Development.</p> <p>The parameters should use the maximum envelope within which the built development may be undertaken, to ensure a worst-case assessment. When considering the worst-case scenario for each aspect scoped in to the assessment, the interactions between aspects should also be taken into account.</p> <p>The development parameters should be clearly defined in the DCO and in the accompanying ES. The description of the Proposed Development in the ES must not be so wide that it is insufficiently certain to comply with the requirements of Regulation 14 of the EIA Regulations. The Inspectorate draws the Applicant's attention to Advice Note 9: Rochdale Envelope, which states that "it will be for the authority responsible for issuing the development consent to decide whether it is satisfied, given the nature of the project in question, that it has 'full knowledge' of its likely significant effects on the environment."</p> |
| 216 | Paragraph 14.31 | Extent of peat deposits | <p>The presence of peat deposits and peat habitats within the Proposed Development is identified in Scoping Report Chapter 14. The extent of these deposits should be identified in the ES and considered in the relevant aspect assessments, where significant effects are likely to occur.</p> |

| ID | Ref | Description | Inspectorate's comments |
|------|-----|---|--|
| 21.7 | n/a | Phasing and assessment years – construction and operation | <p>The Scoping Report refers to the daily rail freight movements potentially increasing to a maximum capacity but the period of time over which this would occur is not defined. This should be set out in the ES and considered within the assessment.</p> <p>The ES should describe whether the Proposed Development would be phased in its delivery and how these phases have been assessed with reference to defined assessment years.</p> |
| 21.8 | n/a | Transboundary | <p>The Inspectorate on behalf of the SoS has considered the Proposed Development and concludes that the Proposed Development is unlikely to have a significant effect either alone or cumulatively on the environment in a European Economic Area State. In reaching this conclusion the Inspectorate has identified and considered the Proposed Development's likely impacts including consideration of potential pathways and the extent, magnitude, probability, duration, frequency and reversibility of the impacts.</p> <p>The Inspectorate considers that the likelihood of transboundary effects resulting from the Proposed Development is so low that it does not warrant the issue of a detailed transboundary screening. However, this position will remain under review and will have regard to any new or materially different information coming to light which may alter that decision.</p> <p>The SoS' duty under Regulation 32 of the 2017 EIA Regulations continues throughout the application process.</p> <p>The Inspectorate's screening of transboundary issues is based on the relevant considerations specified in the Annex to its Advice Page 'Nationally Significant Infrastructure Projects: Advice on Transboundary Impacts and Process', links for which can be found in paragraph 1.0.7 of this opinion above.</p> |

3. ENVIRONMENTAL ASPECT COMMENTS

3.1 Transport

(Scoping Report Section 6)

| ID | Ref | Applicant's proposed matters to scope out | Inspectorate's comments |
|------|-----------|--|--|
| 31.1 | Table 6.6 | Construction traffic travelling to and from the DCO site | The Scoping Report proposes to scope this matter out of further assessment, on the basis that past experience indicates this is not expected to result in a significant increase in traffic. Given that there are no details yet available of the likely level of construction traffic, including whether this would include abnormal loads, and as Figure 6.1 (extract from a traffic assessment for the Parkside Link Road development) indicates there may be existing capacity issues on the surrounding road network, the Inspectorate does not agree that this matter can be scoped out of the assessment at this stage. |

| ID | Ref | Description | Inspectorate's comments |
|------|----------------|---|--|
| 31.2 | Paragraph 6.74 | Parkside Link Road Saturn Traffic Model | The ES should ensure any models used are up-to-date. Models should be re-calibrated and re-validated where necessary and accurately reflect the proposed scenarios and assessment years. |

3.2 Air Quality

(Scoping Report Section 7)

| ID | Ref | Applicant's proposed matters to scope out | Inspectorate's comments |
|-----|-----|---|--|
| 321 | n/a | n/a | No matters have been proposed to be scoped out of the assessment |

| ID | Ref | Description | Inspectorate's comments |
|-----|----------------|---|--|
| 322 | Paragraph 7.56 | Combined Heat and Power (CHP) - operation | Effects from combustion plant such as CHP are scoped into the assessment but details of the assessment are dependent on the specification of the plant that would be included in the Proposed Development. The study area and approach for this assessment should be discussed and where possible agreed with relevant consultation bodies and should include effects on both human and ecological receptors. |
| 323 | n/a | Air Quality assessment – ecological receptors | The Applicant's attention is drawn to the Inspectorate's comments in ID 3.2.2 and 3.5.7 of this Scoping Opinion in relation to the assessment of air quality effects. The Scoping Report is not clear whether effects from potential combustion plant on ecological receptors are identified as part of the scope of the air quality assessment and are not referred to in the ecology and biodiversity scope. The ES should include an assessment of air quality effects from combustion on ecological receptors. There should be appropriate cross reference between the air quality and ecology and biodiversity assessments to ensure consistency. The study area and approach for this assessment should be discussed and agreed with relevant consultation bodies. |

3.3 Noise and Vibration

(Scoping Report Section 8)

| ID | Ref | Applicant's proposed matters to scope out | Inspectorate's comments |
|-----|------------|--|--|
| 331 | Table 8.10 | Construction vibration beyond 100m from nearest construction activity likely to induce vibration | The Scoping Report seeks to scope out vibration effects beyond 100m from construction activities on the basis that there would not be any significant effects beyond this distance. The Inspectorate agrees that this matter is unlikely to lead to significant effects and can be scoped out of the assessment. |
| 332 | Table 8.10 | Operational vibration from vehicles travelling along highway network | <p>The Scoping Report seeks to scope out operational vibration from vehicles travelling along the highway network on the basis of that a smooth road surface is unlikely to be a source of significant vibration.</p> <p>The Scoping Report does not set out which roads in the local highway network are likely to be the main source of operational traffic nor their condition. Given this uncertainty, and as the condition of these roads may also be outside the control of the Applicant, the Inspectorate does not therefore agree to scope this matter out at this stage.</p> |
| 333 | Table 8.10 | Operational vibration from vehicles travelling along Parkside Link Road or new access roads | The Scoping Report seeks to scope out operational vibration from vehicles travelling along Parkside Link Road as this is a new road that would therefore be unlikely to generate vibration effects. The ES would also set out the measures that would be applied to ensure the surface was maintained to prevent irregularities. The Inspectorate agrees that provided evidence is supplied in the ES of how the measures to maintain the road will be secured, that this matter can be scoped out of the assessment. |

| ID | Ref | Description | Inspectorate's comments |
|-----|----------------|--|--|
| 334 | Paragraph 8.89 | Operational noise and vibration – energy plant | The ES should include an assessment of the proposed energy infrastructure, including operation of the battery storage and CHP plant, where these are included as part of the Proposed Development and where significant effects are likely to occur. |

3.4 Landscape and Visual

(Scoping Report Section 9)

| ID | Ref | Applicant's proposed matters to scope out | Inspectorate's comments |
|------|-----------|--|---|
| 34.1 | Table 9.4 | Statutory designated landscapes – construction and operation | The Scoping Report seeks to scope out effects on statutory designated landscapes as none occur within the study area. The Inspectorate agrees that given the location and scale of the Proposed Development, this matter can be scoped out of the assessment. |
| 34.2 | Table 9.4 | Non-statutory designated landscapes – construction and operation | It is not clear in the Scoping Report what is included in the definition of 'non-statutory designated landscapes'. The Inspectorate considers that provided the impact on local landscape character is assessed, and the term non-statutory designated landscapes is defined in the ES, that this matter can be scoped out of the assessment. |
| 34.3 | Table 9.4 | Effects on National Character Areas – construction and operation | <p>The Scoping Report seeks to scope out effects on National Character Areas on the basis that local level landscape character is a more appropriate scale for the assessment. The Inspectorate therefore agrees that this matter can be scoped out of the assessment.</p> <p>The Inspectorate notes that nevertheless, National Character Areas should be considered as part of the baseline description for the Proposed Development.</p> |

| ID | Ref | Description | Inspectorate's comments |
|------|---------------|---------------------------------|--|
| 34.4 | Paragraph 9.3 | Receptors beyond 5km study area | The Scoping Report refers to reference to receptors beyond the 5km study area potentially being affected. The ES should demonstrate how receptors further afield would be identified and assessed and the reasons for their selection. |

3.5 Ecology and Biodiversity

(Scoping Report Section 10)

| ID | Ref | Applicant's proposed matters to scope out | Inspectorate's comments |
|-----|-----------------|---|--|
| 351 | Table 10.2 | Manchester Mosses SAC Rixton Clay Pits SAC | <p>The Scoping Report seeks to scope out effects on Manchester Mosses SAC and Rixton Clay Pits SAC on the basis of the distance from the Proposed Development and lack of impact-pathways. The Inspectorate notes that potential effects from combustion on Manchester Mosses SAC are scoped into the assessment of effects in Scoping Report Chapter 7 (Air Quality) but not Rixton Clay Pits SAC.</p> <p>The Inspectorate considers that there is potential for effects on Manchester Mosses SAC and Rixton Clay Pits SAC from air quality emissions associated with the Proposed Development. These sites cannot therefore be scoped out of the assessment at this stage. The ES should also ensure appropriate cross reference between the ecology assessment and other relevant aspect assessments to ensure consistency.</p> |
| 352 | Paragraph 10.63 | Other statutory designated sites | <p>The Scoping Report seeks to scope out all other statutory designated sites from the assessment. The Applicant's attention is drawn to the Inspectorate's comments in relation to the extent of the study area in the scoping report in ID 3.5.7. As such, the Inspectorate does not agree that other statutory designated sites can be scoped out of the assessment at this stage.</p> |
| 353 | Table 10.2 | Arable Land – construction and operation | <p>The Scoping Report seeks to scope out effects on agricultural land due to it being insignificant in terms of the habitat available in the wider locality. The Inspectorate notes that field surveys, including for breeding and wintering birds, have not yet been completed. The Inspectorate considers that arable land cannot therefore be scoped out of the assessment at this stage.</p> |

| ID | Ref | Applicant's proposed matters to scope out | Inspectorate's comments |
|-----|------------|--|--|
| 354 | Table 10.2 | Otter and water vole – construction and operation | The Scoping Report seeks to scope out effects on otter and water vole on the basis of there being no aquatic habitat within the area of the Proposed Development. The Inspectorate notes that field surveys of the Proposed Development have not yet been completed and notes within Scoping Report Chapters 13 and 14, reference to watercourses and ditches along the northern boundary of the Proposed Development with possible linkages to Highfield Moss Site of Special Scientific Interest (SSSI). The ES should be supported by appropriate baseline data and surveys and in the absence of agreement with relevant consultation bodies, the Inspectorate does not therefore agree this matter can be scoped out of the assessment at this stage. |
| 355 | Table 10.2 | Reptiles – construction and operation | The Scoping Report seeks to scope out effects on reptiles due to a lack of suitable habitat within the Proposed Development. The Inspectorate notes that field surveys have not yet been completed for the whole of the Proposed Development to confirm all potential habitat for reptiles. Where a lack of suitable habitat for reptiles is confirmed through further field survey, the Inspectorate agrees this matter does not require further assessment. This should however be confirmed in the ES through provision of appropriate evidence and/ or through evidence of agreement with relevant consultation bodies. The Inspectorate does not therefore agree this matter can be scoped out of the assessment at this stage. |
| 356 | Table 10.2 | Other non-statutory sites within 2km of the Proposed Development | Table 10.2 states that potential impacts to these sites are considered unlikely for construction and operation, although Table 10.2 also states that construction effects are scoped into the assessment while operation effects are scoped out using the same reasoning. In the absence of further evidence demonstrating there is no potential for significant effects, or clear agreement that this is the case with relevant consultation bodies, the Inspectorate does not agree to scope these matters out of the assessment. Accordingly, the ES should include an assessment of effects on non-statutory sites. |

| ID | Ref | Description | Inspectorate's comments |
|-------|-----------------|--|---|
| 35.7 | n/a | Assessment of air quality emissions including from combustion plant | <p>The Ecology and Biodiversity Scoping Report chapter does not consider the potential for effects from changes to air quality associated with the potential CHP plant, or rail and road emissions during construction and operation of the Proposed Development.</p> <p>The ES should include an assessment of effects in conjunction with the assessment of air quality effects. The approach, study area and receptors for this assessment should be discussed and agreed with relevant consultation bodies.</p> |
| 35.8 | Paragraph 10.41 | Study areas | <p>The Inspectorate considers that the proposed study area may therefore need to be extended beyond 2km to account for the wider scope of potential impact-pathways. The study areas should be based on appropriate published guidance and discussed and agreed with relevant consultation bodies. An assessment of effects on identified features should be provided in the ES, where significant effects are likely to occur.</p> |
| 35.9 | Paragraph 10.79 | Construction Environmental Management Plan (CEMP) – Invasive Non-Native Species (INNS) | <p>The proposed CEMP should include control and management measures for other INNS in addition to Himalayan Balsam where these are identified through further desk and / or field-based studies.</p> |
| 35.10 | Table 10.2 | Habitat surveys – trees and ancient woodland | <p>The Scoping Report refers to effects on broadleaved woodland but it is not clear whether any woodland within the Proposed Development could be ancient woodland. This should be clarified in the ES through appropriate surveys. Tree surveys should also be carried out and identify whether any trees present could be veteran or ancient trees. An assessment of effects on these receptors should be provided where they are identified and where significant effects are likely to occur.</p> |
| 35.11 | n/a | Field surveys | <p>Baseline survey scopes should include consideration of existing buildings or structures within the Proposed Development. The approach and methodology for</p> |

| ID | Ref | Description | Inspectorate's comments |
|-------|-----|----------------------|--|
| | | | surveys should be discussed and where possible agreed with relevant consultation bodies. |
| 35.12 | n/a | Confidential Annexes | Public bodies have a responsibility to avoid releasing environmental information that could bring about harm to sensitive or vulnerable ecological features. Specific survey and assessment data relating to the presence and locations of species such as badgers, rare birds and plants that could be subject to disturbance, damage, persecution, or commercial exploitation resulting from publication of the information, should be provided in the ES as a confidential annex. All other assessment information should be included in an ES chapter, as normal, with a placeholder explaining that a confidential annex has been submitted to the Inspectorate and may be made available subject to request. |

3.6 Built Heritage

(Scoping Report Section 11)

| ID | Ref | Applicant's proposed matters to scope out | Inspectorate's comments |
|-----|------------|--|---|
| 361 | Table 11.4 | <p>Designated Heritage Assets:</p> <ul style="list-style-type: none"> • Bowl Barrow West of Highfield Lane (Scheduled Monument) • Castlehill Motte and Bailey and Bowl Barrow (Scheduled Monument) <p>Construction and operation</p> | <p>The Scoping Report seeks to scope out effects on these assets due to a lack of visibility to the Proposed Development.</p> <p>The Inspectorate notes that Bowl Barrow West of Highfield Lane is identified within an area of potential visibility in Scoping Report Figure 9.2. The lack of visibility to this asset should therefore be confirmed in the ES. Castlehill Motte and Bailey and Bowl Barrow would appear not to be within an area of visibility. The Inspectorate considers that provided the reasons for lack of visibility between these assets and the Proposed Development are set out in the ES, that these assets can be scoped out of further assessment.</p> |
| 362 | Table 11.4 | <p>Non-Designated Heritage Assets:</p> <ul style="list-style-type: none"> • No. 149 Mill Lane • The Millstone Public House • Nos. 45-51 Golborne Dale Road No. 6 Bull Houses • Nos. 18-14 Bull Houses | <p>The Scoping Report seeks to scope out effects on these as low value locally important heritage assets and due to limited intervisibility with the Proposed Development.</p> <p>The Inspectorate agrees that on this basis, these assets can be scoped out of further consideration.</p> |

| ID | Ref | Applicant's proposed matters to scope out | Inspectorate's comments |
|-----|------------|--|--|
| | | Highfield Kenyon Lane Local Listed Building Construction and operation | |
| 363 | Table 11.4 | Heritage assets within 3km of the Proposed Development | <p>The Scoping Report seeks to scope out assessment of heritage assets within a wider 3km study area on the basis that through the use of a Zone of Theoretical Visibility, it is considered unlikely that the Proposed Development would be substantially visible at this distance.</p> <p>The ES should present the findings of this assessment to confirm whether there are any likely significant effects on setting of heritage assets within the wider 3km study area from the Proposed Development. Subject to confirmation in the ES, demonstrating that significant effects are unlikely, the Inspectorate agrees to scope this matter out.</p> |

| ID | Ref | Description | Inspectorate's comments |
|-----|------------|----------------|--|
| 364 | Table 11.1 | Heritage value | <p>Table 11.1 should identify non-statutory designated sites such as Registered Parks and Gardens and Registered Battlefields (the site of the Historic Battlefield of Winwick is identified within the Proposed Development). The ES should also clarify how non-designated heritage assets that are not in a poor state of preservation would be valued. The Inspectorate notes that while Table 11.1 values Grade 1 Listed Buildings as 'high' sensitivity, Scoping Report Table 12.1 considers them in the 'very high' category.</p> <p>These matters should be addressed in the ES. The methodology for the assessment should be discussed and where possible agreed with relevant consultation bodies.</p> |

| ID | Ref | Description | Inspectorate's comments |
|-----------|-----------------|---|---|
| 365 | Table 11.1 | Grade II Listed Buildings | The Inspectorate considers that Grade II Listed Buildings should be afforded the same value (high) as other nationally designated sites in the methodology. |
| 366 | Paragraph 11.47 | Understanding and appreciation of heritage assets | The ES should also consider how all phases of the Proposed Development could affect the perception and understanding of heritage assets, where significant effects are likely to occur. |
| 367 | n/a | Viewpoints | The heritage assessment should cross refer to the landscape and visual impact assessment in the use and selection of viewpoints. |

3.7 Archaeology

(Scoping Report Section 12)

| ID | Ref | Applicant's proposed matters to scope out | Inspectorate's comments |
|------|------------|---|---|
| 37.1 | Table 12.4 | Prehistoric, Roman, Medieval, Post-Medieval remains - operation | The Scoping Report seeks to scope out effects on archaeological remains from these periods during operation, on the basis that the impacts will all occur during enabling and construction work. The Inspectorate agrees that this matter can be scoped out of the assessment on that basis. The ES should nevertheless confirm that no below ground works are required during the operation phase. |

| ID | Ref | Description | Inspectorate's comments |
|------|----------------|----------------|--|
| 37.2 | Table 12.1 | Heritage value | The Applicant is directed to the Inspectorate's comments in ID 3.6.4 of this Scoping Opinion which identifies inconsistency between the valuation of receptor sensitivity in Tables 11.1 and 12.1 of the Scoping Report. This should also be clarified in the ES for the assessment of archaeological receptors. |
| 37.3 | Paragraph 11.9 | Baseline data | The ES baseline data should be supported by information from the Cheshire Historic Environment Record. |

3.8 Hydrology

(Scoping Report Section 13)

| ID | Ref | Applicant's proposed matters to scope out | Inspectorate's comments |
|-----|------------|---|--|
| 381 | Table 13.4 | Flood risk from coastal sources | The Scoping Report seeks to scope out effects from flood risk arising from coastal sources. The Inspectorate considers given the nature and location of the Proposed Development that significant effects are unlikely to occur from coastal flooding. On that basis, this matter can be scoped out of the assessment. |
| 382 | Table 13.4 | Flood risk from canal sources | The Scoping Report seeks to scope out effects from flooding from canals on the basis that the nearest canal is 3.8km north of the Proposed Development and due to intervening topography. The Inspectorate agrees that on that basis, this matter can be scoped out of the assessment on that basis. |
| 383 | Table 13.4 | Flood risk from reservoir sources | The Scoping Report seeks to scope out effects from reservoir flooding on the basis that the Proposed Development is outside the area of inundation in the event of reservoir failure. The Inspectorate agrees that provided appropriate evidence, such as Environment Agency mapping, is provided in the ES to confirm this, that this matter can be scoped out of the assessment. |

| ID | Ref | Description | Inspectorate's comments |
|-----|--------------------------------|-------------|--|
| 384 | Paragraph 13.61 Figure 13.3 | Study area | The Inspectorate considers that the study area for the hydrology assessment (limited to the site of the Proposed Development only) is not sufficient to capture the potential impact-pathways from the Proposed Development to potential receptors and to fully establish flood risk (particularly downstream flood risk), given the nature and extent of the Proposed Development. Different study areas could also be appropriate for the different matters scoped within the assessment. The extent of and rationale for selecting the study area(s) should be clearly and consistently set out in the ES and |

| ID | Ref | Description | Inspectorate's comments |
|-----|-----------------|--|---|
| | | | <p>associated figures, in order to represent the potential maximum extent of likely significant effects.</p> <p>The Applicant is encouraged to agree the study area(s) with relevant consultation bodies, including the Environment Agency and Lead Local Flood Bodies.</p> <p>Please also see the Inspectorate's comment which defines study areas within the Geology, Soils and Contaminated Land in ID 3.9.5 of this Scoping Opinion.</p> |
| 385 | Table 13.2 | Magnitude of effect | This table should also describe how magnitude of effect on potable water supply and licenced abstractions will be defined. |
| 386 | Paragraph 13.81 | Surface water quality – effects from fire-fighting foams | Where this element is included in the Proposed Development, effects from potential discharges of firewater foam associated with battery storage should be included in the assessment of site discharges to surface water within the ES. |
| 387 | n/a | Assessment of effects on groundwater receptors | The Inspectorate notes inconsistencies and omissions in the receptors that have been identified in Scoping Report Chapters 13 and 14. The ES should clarify where the assessment of effects on these receptors is presented and ensure, where relevant, that there is appropriate cross reference between related assessments. The Applicant's attention is drawn to the response from the Environment Agency which identifies further receptors that should be considered. |
| 388 | n/a | Groundwater quality and availability | The assessment of effects on water quality should include consideration of the effects on groundwater quality, where significant effects are likely to occur. |

3.9 Geology, Soils and Contaminated Land

(Scoping Report Section 14)

| ID | Ref | Applicant's proposed matters to scope out | Inspectorate's comments |
|-----|----------------------------|--|--|
| 391 | Table 14.3 | Impacts on or loss of soils and geology as a Resource - construction | <p>The Scoping Report seeks to scope out the effects from construction on soils and geology as a resource. The Inspectorate considers that given the location of the Main Site on agricultural land, that there is potential for significant effects on soils and agricultural land from the Proposed Development. This matter cannot therefore be scoped out of the assessment at this stage. Please see the Inspectorate's comments in ID 3.9.10 that effects on soils and potential loss of Best and Most Versatile Land (BMV) should be considered within the assessment.</p> |
| 392 | Table 14.3 | Impacts on receptors from construction related activities | <p>The Scoping Report does not define 'construction related activities' and seeks to scope out effects from construction on all receptors on the basis that appropriate mitigation, such as a CEMP and Materials Management Plan (MMP) would be provided within the ES.</p> <p>Given that it is not clear what effects this matter would include and how it would affect the different receptors listed in paragraph 14.59, the Inspectorate does not agree to scope this out of the assessment at this stage.</p> <p>The assessment of construction effects on receptors should therefore be clarified in the ES. The Applicant is reminded that details of the measures within the CEMP and MMP should be informed by the assessment of effects.</p> |
| 393 | Table 14.3 Paragraph 14.61 | Encountering Unexploded Ordnance - construction | <p>The Scoping Report seeks to scope this matter out, on the basis that the Proposed Development site is in a low Unexploded Ordnance risk area. The ES should confirm the evidence of the Proposed Development being sited in an area of low risk, but on that basis the Inspectorate agrees that this matter can be scoped out of the assessment.</p> |

| ID | Ref | Applicant's proposed matters to scope out | Inspectorate's comments |
|-----------|------------|--|--|
| 394 | Table 14.3 | Mining related impacts - operation | The Scoping Report seeks to scope out impacts during operation related to mining, explaining that the Proposed Development is not in a Development High Risk Area as designated by the Coal Authority. The Inspectorate considers given the location of the Proposed Development that significant effects are unlikely to occur. On that basis, this matter can be scoped out of the assessment. |

| ID | Ref | Description | Inspectorate's comments |
|-----------|----------------------------|--------------------------------------|---|
| 395 | Paragraph 14.58 | Study Area(s) | The geographical scope study area is stated to include a 250m radius from the Proposed Development. The Inspectorate notes the recommendation of the Environment Agency that a 500m study area should be applied, and the ES should take account of the study areas for other relevant assessments (please see ID 3.8.4 of this Scoping Opinion). |
| 396 | Table 14.1 Paragraph 14.59 | Receptors | Receptors should include source protection zones, drinking water safeguard zones, groundwater abstractions and confirm if locally or regionally designated geological sites could be affected by the Proposed Development. These should be assigned a sensitivity and an assessment provided, where significant effects are likely to occur. |
| 397 | Paragraph 14.60 | Battery storage | The ES should include an assessment of effects arising from the possible battery storage as part of the Proposed Development. |
| 398 | Table 14.3 | Effects from hydrogeological changes | The assessment of effects from changes to the hydrogeological regime should consider the potential of the Proposed Development to affect regional groundwater flow regimes during construction and operation, in addition to effects on Highfield Moss SSSI. |

| ID | Ref | Description | Inspectorate's comments |
|-------|-----|---------------------------|--|
| 399 | n/a | Contamination - operation | Potential effects on groundwater, source protection zones and potable water supplies from potential sources of contamination during operation, including from possible battery storage, should be scoped into the assessment. |
| 39.10 | n/a | Agricultural land | <p>The Scoping Report identifies that the Main Site comprises agricultural land and refers to an Agricultural Land Classification (ALC) being undertaken and submitted with the DCO application. With reference to ID 3.9.1 of this Scoping Opinion, the ES should include an assessment of effects on soils and on BMV agricultural land.</p> <p>The ES should contain a clear tabulation of the areas of land in each BMV classification to be temporarily or permanently lost as a result of the Proposed Development, with reference to accompanying map(s) depicting the grades. Specific justification for the use of the land by grade should be provided. An assessment of effects of the loss of agricultural land should therefore be provided in the ES and supported by appropriate ALC and soil surveys.</p> <p>Consideration should be given to the use of BMV land in the Applicant's discussion of alternatives.</p> |

3.10 Materials and Waste

(Scoping Report Section 15)

| ID | Ref | Applicant's proposed matters to scope out | Inspectorate's comments |
|--------|-----|---|---|
| 3.10.1 | n/a | n/a | No matters have been proposed to be scoped out of the assessment. |

| ID | Ref | Description | Inspectorate's comments |
|--------|-----------------|---|--|
| 3.10.2 | Paragraph 15.82 | Assessment of effects from imported and exported material | The Scoping Report states that a cut and fill earthworks strategy will aim to achieve a balance on the Proposed Development site, and if this is unachievable then receiver sites will be found with the reuse of soil facilitated under a Site Waste Management Plan and a MMP. The ES should clarify if significant amounts of material are to be imported or exported for the Proposed Development. Where significant effects would occur from the import and export of materials, this should be assessed in the ES. Appropriate cross reference should be made between other related assessments. |

3.11 Energy and Climate Change

(Scoping Report Section 16)

| ID | Ref | Applicant's proposed matters to scope out | Inspectorate's comments |
|--------|-----|---|--|
| 3.11.1 | n/a | n/a | No matters have been proposed to be scoped out of the assessment |

| ID | Ref | Description | Inspectorate's comments |
|--------|-----------------|------------------------|---|
| 3.11.2 | Paragraph 16.45 | Rail freight emissions | The assessment should also take account of any changes in rail movements as a result of the Proposed Development. |

3.12 Socio-economics

(Scoping Report Section 17)

| ID | Ref | Applicant's proposed matters to scope out | Inspectorate's comments |
|-------|------------|---|---|
| 3.121 | Table 17.5 | Impact on local social infrastructure as a result of an increase in on-site jobs - construction | <p>The Scoping Report proposes to scope out the effects from an increase in on-site jobs on the basis that construction jobs are likely to be taken by local workers and would not therefore affect social infrastructure.</p> <p>The Inspectorate considers that given the stage of the Proposed Development and the lack of information on the impact of construction, that this matter cannot be scoped out of the assessment at this stage.</p> |

| ID | Ref | Description | Inspectorate's comments |
|-------|-----|-------------|-------------------------|
| 3.122 | n/a | n/a | n/a |

3.13 Population and Human Health

(Scoping Report Section 18)

| ID | Ref | Applicant's proposed matters to scope out | Inspectorate's comments |
|-------|------------|---|---|
| 3.131 | Table 18.5 | Risk taking behaviour - operation | The Scoping Report explains that due to the nature of the Proposed Development the only people on-site during operation would be members of the workforce, who would remain on-site during the day. Therefore the potential for risk taking behaviour is minimal. The Inspectorate agrees that this matter can be scoped out of further assessment. |
| 3.132 | Table 18.5 | Diet and nutrition – construction and operation | Given that the Proposed Development does not have a material impact on access to food, diet or nutrition, the Inspectorate agrees that this matter can be scoped out of further assessment. |
| 3.133 | Table 18.5 | Housing – construction and operation | The Scoping Report explains that the impact of the Proposed Development on local housing will be assessed in the socio-economic section of the assessment, due to the scale of the required construction and operational employment. This is accordingly scoped into Chapter 17 of the Scoping Report. The Inspectorate is content with this approach and agrees this matter can be scoped out of further population and human health assessment on the basis that the ES appropriately cross references to relevant other assessments. |
| 3.134 | Table 18.5 | Relocation – construction and operation | Given the nature and location of the Proposed Development, only a small number of individual residential dwellings/farmsteads that are currently on site would need to be demolished. The Scoping Report states it is not considered to be of a level to have an impact on population. On this basis, the Inspectorate is content to scope this matter out of further assessment. |

| ID | Ref | Applicant's proposed matters to scope out | Inspectorate's comments |
|---------|------------|--|---|
| 3.135 | Table 18.5 | Community safety – construction and operation | The Scoping Report states that the Proposed Development site would be secure throughout the construction and operational phases of the development, and subject to security measures to deter the potential for anti-social behaviour and crime. The safety of workers on site will be ensured through measures required by the Health and Safety at Work Act. On the basis that appropriate safety measures are secured through the DCO, the Inspectorate agrees that this matter can be scoped out. |
| 3.136 | Table 18.5 | Social participation, interaction and support – operation | The Scoping Report proposes that this effect would be assessed as a permanent effect in the construction phase, including spanning the operation phase. On this basis, the Inspectorate agrees that effects during operation may be assessed as part of the effects during construction. |
| 3.137 | Table 18.5 | Education and training – construction and operation | The Scoping Report proposes this to be assessed as part of the socio-economics ES Chapter. The Inspectorate agrees with this approach on the basis that the ES appropriately cross references to where it is assessed. |
| 3.138 | Table 18.5 | Water quality or availability – construction and operation | The Scoping Report proposes this to be assessed as part of the hydrology ES Chapter. The Inspectorate agrees with this approach, provided that the ES appropriately cross references to where this matter is assessed. |
| 3.139 | Table 18.5 | Land quality – construction and operation | The Scoping Report proposes this to be assessed as part of the geology, soils and contaminated land ES Chapter. The Inspectorate agrees with this approach on the basis that the ES appropriately cross references to where it is assessed. |
| 3.13.10 | Table 18.5 | Radiation – construction and operation | The Scoping Report does not identify any significant sources of radiation during construction and operation. On the basis that this is confirmed in the description of the Proposed Development in the ES, the Inspectorate agrees that this matter can be scoped out. |

| ID | Ref | Applicant's proposed matters to scope out | Inspectorate's comments |
|---------|------------|--|---|
| 3.13.11 | Table 18.5 | Health and social care services – operation | Impacts on the demand for health and social care services are scoped out on the basis that the operational workforce would commute on a daily basis. This does not explain why there would not be increased demand on the health and social care services. However, taking into account the nature of the operation of the Proposed Development, the Inspectorate considers it unlikely that significant effects are likely to occur during operation. Subject to confirmation in the ES of the number and likely location of the operational workforce, demonstrating that significant effects are unlikely, the Inspectorate agrees to scope this matter out. |
| 3.13.12 | Table 18.5 | Built environment – construction and operation | The Scoping Report is unclear what is meant by 'built environment' in this context. The Inspectorate does not therefore agree that this matter can be scoped out on the basis that the Proposed Development would not influence the built environment. As the Proposed Development would influence the built environment through its existence ie alter the setting and economics of the environment in which it operates, the Inspectorate considers that this matter should be scoped in. The ES should also include a definition of what is included in 'built environment'. |
| 3.13.13 | Table 18.5 | Wider societal infrastructure and resources – construction | The Scoping Report is unclear what is meant by 'wider societal infrastructure and resources'. Due to the lack of clarity, the Inspectorate does not agree to scope this matter out. The ES should include a definition of what is meant by these terms and either explain why significant effects are not likely or provide an assessment of significant effects where they are likely to occur. |
| 3.13.14 | Table 18.5 | Wider societal infrastructure and resources – operation | This is proposed to be assessed within other ES Chapters, although these other chapters are not named. The Inspectorate agrees that this may be assessed in other relevant chapters in the ES. However, the ES should clearly cross reference where it is assessed. The ES should also clearly define what 'wider societal infrastructure and resources' are being assessed. |

| ID | Ref | Description | Inspectorate's comments |
|---------|----------------------------|------------------------|---|
| 3.13.15 | Paragraph 18.28 | Study area | <p>The Scoping Report states that baseline health related data will be collected from administrative areas within a 500m of the Proposed Development. Scoping Report paragraphs 18.36 and 18.37 go on to say that the study area will extend to the inter-related topic study areas.</p> <p>There is no explanation as to why a 500m study area has been applied. The ES should justify why the study area is appropriate and evidence any agreement with relevant consultation bodies. The baseline should be characterised for the identified study area.</p> |
| 3.13.16 | Table 18.1 | Desk study | <p>Whilst Table 18.1 identifies the local health circumstance summary, it does not explain what sources have been used to gather these data. The ES should set out a methodology to explain how and where baseline data have been gathered.</p> |
| 3.13.17 | Paragraphs 18.46 and 18.47 | Operational mitigation | <p>Where mitigation measures are proposed during operation, these should be set out in an operational management plan and secured through the DCO. This should be submitted with the application.</p> |

3.14 Major Accidents and Disasters

(Scoping Report Section 19)

| ID | Ref | Applicant's proposed matters to scope out | Inspectorate's comments |
|--------|-----|---|--|
| 3.14.1 | n/a | n/a | No matters have been proposed to be scoped out of the assessment |

| ID | Ref | Description | Inspectorate's comments |
|--------|-----|-------------|-------------------------|
| 3.14.2 | n/a | n/a | n/a |

3.15 Cumulative and In-combination Effects

(Scoping Report Section 20)

| ID | Ref | Applicant's proposed matters to scope out | Inspectorate's comments |
|--------|-----|---|--|
| 3.15.1 | n/a | n/a | No matters have been proposed to be scoped out of the assessment |

| ID | Ref | Description | Inspectorate's comments |
|-------|----------------------------|---------------------------|--|
| 3.152 | Paragraphs 20.10 and 20.11 | Proposed list of projects | Figures should be provided for ease of reference to show the projects considered in the cumulative effects assessment (CEA). The list and nature of the projects should be discussed and where possible agreed with relevant consultation bodies. The Applicant's attention is directed to the response of St Helens Council which includes further projects for consideration in the CEA. |

APPENDIX 1: CONSULTATION BODIES FORMALLY CONSULTED

TABLE A1: PRESCRIBED CONSULTATION BODIES

Bodies prescribed in Schedule 1 of The Infrastructure Planning (Applications: Prescribed Forms and Procedure) Regulations 2009 (as amended) (the 'APFP Regulations (as amended)')

| SCHEDULE 1 DESCRIPTION | ORGANISATION |
|--|------------------------------------|
| The relevant parish council or, where the application relates to land in Wales or Scotland, the relevant community council | Wrightington Parish Council |
| | Up Holland Parish Council |
| | Coppull Parish Council |
| | Westhoughton Town Council |
| | Blackrod Town Council |
| | Rainhill Parish Council |
| | Bold Parish Council |
| | Eccleston Parish Council |
| | Windle Parish Council |
| | Rainford Parish Council |
| | Seneley Green Parish Council |
| | Billinge Chapel End Parish Council |
| | Shevington Parish Council |
| | Haigh Parish Council |
| | Worthington Parish Council |
| | Croft Parish Council |
| Burtonwood and Westbrook Parish Council | |
| Poulton with Fearnhead Parish Council | |
| Winwick Parish Council | |

| SCHEDULE 1 DESCRIPTION | ORGANISATION |
|--|---------------------------------------|
| | Birchwood Town Council |
| | Culcheth & Glazebury Parish Council |
| The Environment Agency | The Environment Agency |
| Natural England | Natural England |
| The Forestry Commission | The Forestry Commission |
| The Historic Buildings and Monuments Commission for England (known as Historic England) | Historic England |
| The Canal and River Trust | The Canal and River Trust |
| The relevant Highways Authority | Wigan Council |
| | St Helens Council |
| | Warrington Borough Council |
| | National Highways |
| The Civil Aviation Authority | Civil Aviation Authority |
| The Health and Safety Executive | Health and Safety Executive |
| United Kingdom Health Security Agency, an executive agency of the Department of Health and Social Care | United Kingdom Health Security Agency |
| NHS England | NHS England |

TABLE A2: RELEVANT STATUTORY UNDERTAKERS

‘Statutory Undertaker’ is defined in the APFP Regulations (as amended) as having the same meaning as in Section 127 of the Planning Act 2008 (PA2008)

| STATUTORY UNDERTAKER | ORGANISATION |
|--|---|
| The Coal Authority | The Coal Authority |
| The Crown Estate Commissioners | The Crown Estate |
| The relevant police authority | Greater Manchester Combined Authority |
| | Merseyside Police and Crime Commissioning |
| The relevant ambulance service | North West Ambulance Service NHS Trust |
| The relevant fire and rescue authority | Greater Manchester Fire and Rescue Service |
| | Merseyside Fire and Rescue Service |
| | Cheshire Fire and Rescue Service |
| The relevant Integrated Care Board | NHS Greater Manchester Integrated Care Board |
| | NHS Cheshire and Merseyside Integrated Care Board |
| NHS England | NHS England |
| The relevant NHS Trust | North West Ambulance Service NHS Trust |
| Railways | Network Rail Infrastructure Ltd |
| | National Highways Historical Railways Estate |
| Canal Or Inland Navigation Authorities | The Canal and River Trust |
| Civil Aviation Authority | Civil Aviation Authority |
| Universal Service Provider | Royal Mail Group |
| Homes and Communities Agency | Homes England |
| The relevant Environment Agency | The Environment Agency |

| STATUTORY UNDERTAKER | ORGANISATION |
|--|--|
| The relevant water and sewage undertaker | United Utilities |
| The relevant public gas transporter | Cadent Gas Limited |
| | Northern Gas Networks Limited |
| | Scotland Gas Networks Plc |
| | Southern Gas Networks Plc |
| | CNG Services Ltd |
| | Energy Assets Pipelines Limited |
| | ES Pipelines Ltd |
| | ESP Connections Ltd |
| | ESP Networks Ltd |
| | ESP Pipelines Ltd |
| | Fulcrum Pipelines Limited |
| | GTC Pipelines Limited |
| | Harlaxton Gas Networks Limited |
| | Independent Pipelines Limited |
| | Indigo Pipelines Limited |
| | Inovyn Enterprises Ltd |
| | Last Mile Gas Ltd |
| | Leep Gas Networks Limited |
| Mua Gas Limited | |
| Quadrant Pipelines Limited | |
| Stark Works | |
| National Gas | |
| | National Grid Electricity Transmission Plc |

| STATUTORY UNDERTAKER | ORGANISATION |
|--|---|
| The relevant electricity transmitter with CPO Powers | National Grid Electricity System Operation Limited |
| The relevant electricity distributor with CPO Powers | Electricity North West Limited |
| | SP Manweb Plc |
| | Advanced Electricity Networks Ltd |
| | Aidien Ltd |
| | Aurora Utilities Ltd |
| | Eclipse Power Network Limited |
| | Energy Assets Networks Limited |
| | ESP Electricity Limited |
| | Fulcrum Electricity Assets Limited |
| | Green Generation Energy Networks Cymru Ltd |
| | Harlaxton Energy Networks Limited |
| | Independent Distribution Connection Specialists Ltd |
| | Independent Power Networks Limited |
| | Indigo Power Limited |
| | Last Mile Electricity Ltd |
| | Leep Electricity Networks Limited |
| | Mua Electricity Limited |
| | Optimal Power Networks Limited |
| | Stark Infra-Electricity Ltd |
| | The Electricity Network Company Limited |
| UK Power Distribution Limited | |
| Utility Assets Limited | |
| Vattenfall Networks Limited | |

TABLE A3: LOCAL AUTHORITIES AS DEFINED IN SECTION 43(3) OF THE PA2008

| LOCAL AUTHORITY |
|---------------------------------------|
| West Lancashire Borough Council |
| Chorley Borough Council |
| Warrington Borough Council |
| Bolton Metropolitan Borough Council |
| Salford City Council |
| St Helens Council |
| Trafford Metropolitan Borough Council |
| Wigan Council |
| Cheshire West and Chester Council |
| Halton Borough Council |
| Knowsley Metropolitan Borough Council |
| Lancashire County Council |

TABLE A4: NON-PRESCRIBED CONSULTATION BODIES

| ORGANISATION |
|--|
| Liverpool City Region Combined Authority |

APPENDIX 2: RESPONDENTS TO CONSULTATION AND COPIES OF REPLIES

| CONSULTATION BODIES WHO REPLIED BY THE STATUTORY DEADLINE: |
|---|
| The Canal and River Trust |
| Chorley Borough Council |
| The Coal Authority |
| Coppull Parish Council |
| Croft Parish Council |
| The Environment Agency |
| Greater Manchester Combined Authority |
| Halton Borough Council |
| Historic England |
| Health and Safety Executive |
| Indigo Pipelines Limited |
| National Highways |
| Natural England |
| Royal Mail |
| Salford City Council |
| Southern Gas Networks |
| SP Energy Networks |
| St Helens Council |
| UK Health Security Agency |
| United Utilities |
| Warrington Borough Council |
| Wigan Council |

From: [REDACTED]
To: [Intermodal Logistics Park North](#)
Subject: Intermodal Logistics Park North
Date: 26 November 2024 11:13:14
Attachments: [Outlook-4/zickmm.png](#)

You don't often get email from [REDACTED]@canalrivertrust.org.uk. [Learn why this is important](#)

FAO Todd Brumwell

Thank you for your consultation in relation to the Intermodal Logistics Park North. The Canal & River Trust have reviewed the consultation material available, and we can confirm that the proposed development would not have any impact on the waterways that we own and manage. We therefore have no comments to make at this stage based on the available details.

Kind regards

Carrie Lanceley BSc (HONS), MSc
Planning Assistant / Cynorthwy-ydd Cynllunio

M: [REDACTED]
E: [REDACTED][@canalrivertrust.org.uk](mailto:[REDACTED]@canalrivertrust.org.uk)

W www.canalrivertrust.org.uk

Canal & River Trust / Glandwr Cymru,
National Waterways Museum, South Pier Road, Ellesmere Port
Cheshire CH65 4FW
<https://canalrivertrust.org.uk/specialist-teams/planning-and-design>



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Canal & River Trust is a charitable company limited by guarantee registered in England & Wales with company number 7807276 and charity number 1146792. Registered office address National Waterways Museum Ellesmere Port, South Pier Road, Ellesmere Port, Cheshire CH65 4FW.

Cadw mewn cysylltiad

Cofrestrwch i dderbyn e-gylchlythyr Glandŵr Cymru

<https://canalrivertrust.org.uk/newsletter>

Cefnogwch ni ar <https://www.facebook.com/canalrivertrust>

Dilynwch ni ar <https://twitter.com/canalrivertrust> ac

<https://www.instagram.com/canalrivertrust>

Mae'r e-bost hwn a'i atodiadau ar gyfer defnydd y derbynnydd bwriedig yn unig. Os nad chi yw derbynnydd bwriedig yr e-bost hwn a'i atodiadau, ni ddylech gymryd unrhyw

gamau ar sail y cynnwys, ond yn hytrach dylech eu dileu heb eu copïo na'u hanfon ymlaen a rhoi gwybod i'r anfonwr eich bod wedi eu derbyn ar ddamwain. Mae unrhyw farn neu safbwynt a fynegir yn eiddo i'r awdur yn unig ac nid ydynt o reidrwydd yn cynrychioli barn a safbwyntiau Glandŵr Cymru.

Mae Glandŵr Cymru yn gwmni cyfyngedig drwy warant a gofrestrwyd yng Nghymru a Lloegr gyda rhif cwmni 7807276 a rhif elusen gofrestredig 1146792. Swyddfa gofrestredig: National Waterways Museum Ellesmere Port, South Pier Road, Ellesmere Port, Cheshire CH65 4FW.

From: [REDACTED]
To: [Intermodal Logistics Park North](#)
Subject: RE: TR051001 - EIA Scoping Notification and Consultation
Date: 27 November 2024 08:36:26
Attachments: [image001.png](#)
[image002.jpg](#)
[0.png](#)
[1.jpg](#)
[2.jpg](#)
[3.jpg](#)

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Dear Claire

Thank you for your consultation on this.

I can confirm the Council has no comments on the EIA Scoping request.

Kind regards

Mike Halsall

Principal Planning Officer

From: Intermodal Logistics Park North ilpnorth@planninginspectorate.gov.uk

Sent: 05 November 2024 10:51

Cc: Intermodal Logistics Park North ilpnorth@planninginspectorate.gov.uk

Subject: TR051001 - EIA Scoping Notification and Consultation

CAUTION! This email originated from outside of the organisation. Do not click links or open attachments unless you recognise the sender and know the content is safe.

FAO Head of Planning

Dear Sir / Madam

Please see attached correspondence on the proposed Intermodal Logistics Park North.

The Applicant for the Proposed Development intends to make an application for Development Consent under the Planning Act 2008. The Applicant has sought a Scoping Opinion from the Planning Inspectorate, on behalf of the Secretary of State, as to the scope and level of detail of the information to be provided within the Environmental Statement that will accompany its future application.

The Planning Inspectorate has identified you as a consultation body to inform the Scoping Opinion and is therefore inviting you to submit comments by **3 December 2024**. The deadline is a statutory requirement that cannot be extended.

Further information is included within the attached letter.

Many thanks,

Claire Deery

From: [REDACTED]
To: [Intermodal Logistics Park North](#)
Subject: RE: [External] TR0510001 - EIA Scoping Notification and Consultation
Date: 14 November 2024 16:58:42
Attachments: [image003.png](#)
[image010.png](#)
[image001.png](#)
[image002.png](#)
[image004.jpg](#)
[image005.png](#)
[image006.png](#)

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Good afternoon Mr Brumwell
Thank you for your email.

I have reviewed the site identified for the project against the data we hold and can confirm that the site falls outside of the Coal Authority defined Development High Risk Area. The site lies within the Low Risk Area and in this location our records do not indicate the presence of any coal mining features at surface or shallow depth which may pose a risk to surface stability. On this basis the Planning team at the Coal Authority have no specific comments to make on this site. Please do not hesitate to contact me should you wish to discuss this matter further.

Kind regards
Melanie



Melanie Lindsley BA (Hons), DipEH, DipURP, MA, PGCertUD, PGCertSP, MRTPI
Principal Planning & Development Manager

M: [REDACTED]
E: [REDACTED]@coal.gov.uk
W: gov.uk/government/organisations/the-coal-authority

From: Intermodal Logistics Park North <ilpnorth@planninginspectorate.gov.uk>

Sent: 05 November 2024 09:55

Subject: [External] TR0510001 - EIA Scoping Notification and Consultation

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Dear Sir / Madam

Please see attached correspondence on the proposed Intermodal Logistics Park North.

The Applicant for the Proposed Development intends to make an application for Development Consent under the Planning Act 2008. The Applicant has sought a Scoping Opinion from the Planning Inspectorate, on behalf of the Secretary of State, as to the scope and level of detail of the information to be provided within the Environmental Statement that will accompany its future application.

The Planning Inspectorate has identified you as a consultation body to inform the Scoping Opinion and is therefore inviting you to submit comments by **3 December 2024**. The deadline is a statutory requirement that cannot be extended.

Further information is included within the attached letter.

Many thanks,

Todd Brumwell



Todd Brumwell | EIA Advisor
The Planning Inspectorate

@PINSgov The Planning Inspectorate planninginspectorate.gov.uk

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From: [Clerk | Coppull Parish Council](#)
To: [Intermodal Logistics Park North](#)
Subject: TR0510001 - EIA SCOPING NOTIFICATION AND CONSULTATION
Date: 21 November 2024 14:12:42

You don't often get email from clerk@coppull-pc.gov.uk. [Learn why this is important](#)

Dear Sir

Thank you for your email in regard to the above.

I am writing to confirm that Coppull Parish Council does not have any comments on this matter.

Best Wishes

Sue Edwards

Parish Council Clerk

Tel: [REDACTED]

Claire Deery
Planning Inspectorate
National Infrastructure Directorate
Temple Quay House
2 The Square
Bristol
BS1 6PN

Our ref: XA/2024/100207/01

Your ref: TR051001

Date: 3rd December 2024

Dear Claire,

**Planning Act 2008 (as amended) and The Infrastructure Planning
(Environmental Impact Assessment) Regulations 2017 (the EIA Regulations) –
Regulations 10 and 11**

**Application by Intermodal Logistics Park North Limited (the Applicant) for an
Order granting Development Consent for the Intermodal Logistics Park North
(the Proposed Development)**

Thank you for consulting the Environment Agency on the Environmental Impact Assessment (EIA) Scoping Opinion for the above Nationally Significant Infrastructure Project (NSIP).

We have reviewed the report: Intermodal Logistics Park (ILP) North EIA Scoping Report prepared by Tritax Big Box dated November 2024 insofar as it relates to our remit and wish to provide the following comments.

Key additional points for consideration in the EIA:

- All key legislation, policies, position statements and guidance should be fully considered for all disciplines.
- Consideration of water voles in ordinary watercourses.
- Inconsistencies and omissions with regards to geological and hydrogeological setting, water quality and sensitive receptors should be addressed and resolved.

- Full consideration of all groundwater and surface water quality impacts including the impact of battery energy storage.
- Full consideration of impacts of pollutants on all water resources.
- Full consideration of impact of construction related activities on receptors.
- Further consideration of waste-related activities.

These points are explained in more detail below, together with additional general comments for consideration.

1. Flood Risk

The Scoping Report states that surface water, foul water and groundwater will be scoped into the assessment, so a Flood Risk Assessment (FRA) is required.

The Flood Map for Surface Water should inform the FRA as a risk that must be considered at present and in the future. Within the report it states that surface water run-off will be disposed of within two brooks, Cockshot Brook and Newton Brook. A channel capacity assessment needs to be carried out to ascertain if these brooks can cope with any new discharges.

Should any of the site fall within Flood Zone 3 and 2, any infrastructure development should be steered away from this. If any works are to occur within Flood Zone 3 or 2, they will need to be assessed in the FRA and appropriately compensated for. Works within Flood Zone 3 and 2 would also require a Flood Risk Activity Permit (FRAP), under the Environmental Permitting Regulations 2016. See FRAP informative at the end of this response.

2. Ecology and Biodiversity

Water Vole

Water vole should be scoped into the assessment. The draft Order Limits may not contain open watercourses; however, construction activities may potentially impact water voles that inhabit the ordinary watercourses which border the site and at Highfield Moss SSSI. Whilst a buffer has been proposed (Section 10.61), until a firmer idea of mitigation has been confirmed (following the Applicant's consultation with Natural England), we encourage the scoping in of water vole due to the declining national status of the species.

Legislation

Section 10.6 omits to include key pieces of 2024 legislation. The following legislation, policy and guidance should be scoped in: Biodiversity Gain Requirements (Irreplaceable Habitat) Regulations 2024. In addition, we would like to highlight that the new Management of Hedgerows (England) Regulations 2024 have officially

become law, therefore should be included with the Hedgerows Regulations 1997; however, this is not directly within our remit. Protected fish legislation should also be included, namely the Eels (England and Wales) Regulations 2009, and the Salmon and Freshwater Fisheries Act 1975 (SAFFA).

Peat bogs

Due to the presence of peat deposits at Highfield Moss SSSI which have the potential to extend into the draft Order Limits (Section 14.31), the UK Habs/Extended Phase I Habitat Survey Walkover (Section 10.54) should ensure any peat habitats within the Development Consent Order (DCO) site are identified.

Biodiversity Net Gain (BNG)

It is positive to read that the Applicant intends to deliver 10% BNG (Section 10.49). Further details regarding how this will be achieved should be provided in the Preliminary Environmental Impact Report (PEIR) regarding the intention to deliver habitat creation on and off site (Section 3.19). We also encourage the Applicant to provide more than 10% BNG where possible.

Section 3.18 mentions the potential creation of “surface water features” but provides no clarification on the proposed location of such features, and whether this includes ponds or other habitats. The Applicant should submit a BNG Report alongside the DCO application.

It is positive to read that the Applicant conducted a UKHab survey of some habitats within the EIA Scoping Boundary (Section 10.44), which provides more accurate habitat identification data for the BNG Metric. However, we also encourage the surveying of the remaining areas within the site boundary. The Applicant should use the Statutory Biodiversity Metric, and the Watercourse Metric where appropriate.

Environmental Betterment Opportunities

There could be opportunities for environmental betterment and BNG through supporting the delivery of local projects within the Lower Mersey Catchment Partnership. The Applicant should refer to the Lower Mersey Catchment Plan to understand the key catchment issues and local projects that can be supported. The Applicant could consider working with Mersey River Trust on their project to control INNS within the Bollin catchment. Other local projects also include the Fender River Restoration, Alt weir removal and Headbolt Lane Biodiversity Net Gain. By supporting local projects, this would also provide an opportunity for the Applicant to provide off-site BNG enhancements.

Lancashire County Council have been appointed the responsible authority to develop the Local Nature Recovery Strategy. The latest update states that the Council have decided on a list of priorities and potential measures and are currently in the process of drafting the strategy document and Local Habitat Map. The

Applicant should refer to these maps to inform decisions on where to site off-site BNG delivery and potential enhancements, when completed.

Ecological Assessments

It is positive to read that the Applicant has completed or intends to complete species-specific surveys to inform the ecological baseline of the EIA Scoping Boundary (Section 10.44); these survey reports should be provided as part of the PEIR for review.

Invasive Non-Native Species (INNS)

We are pleased to see that the Applicant intends to include Himalayan Balsam management measures into the Construction Environmental Management Plan (CEMP) (Section 10.79). The Environment Agency holds records of other INNS within 2km of the site (such as Japanese Knotweed, three-cornered garlic and American skunk-cabbage). Therefore, we recommend that an INNS management plan be put into place to prevent and respond to potential INNS invasions, especially considering a wetland SSSI borders the site.

Culverted Watercourse

Our records suggest that a culverted watercourse bisects the North-East of the DCO site. This watercourse appears to originate from the converging of the two ordinary watercourses bordering Highfield Moss, and travel South-East across the site, where it joins the Cockshot Brook (a designated statutory main river). We recommend the opening-up of the culvert (where feasible) as they can act as a barrier to aquatic species. We recommend a buffer of at least 8-meters is provided around ordinary watercourses.

Riparian/SSSI Buffer

We would defer to Natural England on any comments regarding the SSSI. However, we encourage the creation of greenspace areas to reduce recreational impacts to the SSSI (Section 10.82). We also recommend that a fence is erected at the end of the riparian buffer to further prevent site workers from accessing the SSSI and the riparian buffer of the ordinary watercourse. We are also pleased to see that further investigations are planned to determine the hydrological connectivity between the DCO and the SSSI (Section 13.88). The investigation results should be provided in the PEIR, to allow consultees to review and comment on any potential impacts to the SSSI.

3. Groundwater and Land Contamination

Guidance and Legislation

We agree that the guidance and best practice listed in Section 13.14 and 14.24 should be consulted. The Applicant should also refer to Environment Agency Groundwater protection position statements - GOV.UK.

Geological and Hydrogeological Setting

The site's geological and hydrogeological setting are described in Section 13.44, 14.31, 14.34 and 14.36. The information is incomplete as it omits to mention bedrock of the Collyhurst Sandstone Formation (Sandstone), which is also present underlying part of the site in the north. This is a Principal aquifer.

The information given in the Scoping Report is inconsistent between chapters, and important receptors have been missed in some places. We agree with the description of Source Protection Zones (SPZs) in Section 14.36, identifying both SPZ2 and SPZ3 within the DCO site. The SPZ2 is not mentioned in Section 13.44. The Drinking Water Safeguard Zone for groundwater which covers part of the site is not mentioned in Section 14.36 but is acknowledged in Section 13.44. A nearby (off-site) potable groundwater abstraction, associated with the SPZs, is not mentioned here, but is listed as a receptor in Section 14.59.

The 'ground' Zone of Influence (ZOI) for assessment is outlined in Section 13.61, 14.58 and 20.9 Table 20.1. The Applicant proposed to use 250m given the absence of a defined radius in the guidance or British Standard. For other similar projects, with a similar sensitivity, we have recently agreed 500m to be suitable. Given the sensitive hydrogeological setting of the site and high permeability soils, we suggest that the ZOI be extended to 500m, to include the potable groundwater abstraction west of the site. This is a consistent approach adopted on projects with similar sensitivities elsewhere.

In Section 14.55 Table 14.1, the Applicant defines the sensitivity of various receptors. SPZs and groundwater abstractions should be included as receptors and assigned a sensitivity.

The Drinking Water Safeguard Zone for groundwater should be included as a Controlled Waters receptor in Section 14.59.

In 14.33, it is identified that significant Made Ground is not indicated to be present under the DCO site. However, our data show a large area of artificial ground between the eastern and western areas which may encroach into the western part of the site. This is not acknowledged in the report and should be considered in future investigations.

Proposed Reports and Investigations

We understand that a draft Phase 1 Geo-environmental Assessment has been prepared (Section 14.27), however a copy has not been supplied at this stage. It appears that pertinent details are summarised in the EIA Scoping report, but we are unable to cross-reference any details given. This includes a summary of potential contamination sources and pathways given in Section 14.51 and 14.52. We look

forward to seeing the full Phase 1 Geo-environmental Assessment and the Conceptual Site Model (CSM) in due course.

A proposed intrusive ground investigation is acknowledged in Section 13.60, and a proposed scope is outlined in Section 14.49. The scope appears to be sufficient at a superficial level, however we have not been able to refer to the Phase 1 study and CSM at this stage. In the absence of further detail, we have some general comments on the scope of the investigation:

- Soakaway and infiltration testing must be sensitive to SPZs and Principal aquifer.
- Groundwater monitoring locations should be targeted based on the CSM and site findings.
- The Applicant proposes four return visits for groundwater and ground gas monitoring. This is acceptable initially, but they should allow for further visits dependent on observations and results (in accordance with BS10175). Where time allows, the Applicant should consider seasonal variation in groundwater levels when designing the monitoring regime, and visits over a longer period may be appropriate.
- Groundwater monitoring wells must be decommissioned in line with current guidance. Evidence to verify this has been done may be required.

Monitoring and sampling must be carried out in accordance with all relevant guidance and current best practice.

A Sustainable Drainage Statement is proposed (Section 13.3 and 13.59). This should include mitigation to prevent negative impacts to controlled waters including groundwater. We would welcome the opportunity to review this document in due course. See also our informative about SuDS at the end of this response.

A CEMP is proposed to manage construction risks (sections 13.84, 14.62, Table 21.1, and elsewhere). The CEMP is used as justification for some matters to be Scoped Out, and we would welcome the opportunity to review this document in due course.

In Section 14.63, the Applicant proposes reuse of soils under a Material Management Plan (MMP) under the CL:AIRE Definition of Waste Code of Practice (DoWCoP) prepared prior to development commencing. This is acceptable. We have provided an informative about reuse of waste soil at the end of this response.

The Applicant proposes to develop a hotspot protocol for managing unexpected contamination (Section 14.67). This will be incorporated into the MMP and a Remediation Strategy or Remediation Design Statement. We support this and would

like the protocol to include a requirement for stopping works within the identifiable bounds of the affected area until further investigation has been carried out and any remediation has been completed. This helps reduce the risk of contamination spreading beyond its bounds or not being dealt with appropriately if other works continue in the area. Any remediation, either during construction or operation, will require a specific method statement to be agreed with the relevant authorities prior to commencement.

Given the sensitive hydrogeological setting, and the scale of the development, further reports and investigations that are not mentioned in the EIA Scoping Report may be required. Dependent on the final project design and results of intrusive investigation works, this may include, but not be limited to, Foundation Works Risk Assessments and a Hydrogeological Risk Assessment. We recommend that the Applicant considers if these are necessary and provides further information in the PEIR or other reports as appropriate.

Permitting Requirements

During construction and operation of the scheme, we anticipate that permits may be required for dewatering and water supply. This is acknowledged in Section 13.83. Some of the proposed site activities may require an environmental permit. See our general informative about permits at the end of this response.

Matters Scoped In and Out of the Assessment

We are not wholly satisfied with the Geology, Soils and Contaminated Land matters to be scoped in and out (Section 14.68). The Applicant refers to the desk-based information in some justification, but as we have not seen the Phase 1 report, we cannot comment on it or use it for this response.

For impacts on receptors from construction related activities, the Applicant proposes the CEMP will address all risks. This is satisfactory provided it can be demonstrated that these risks have been adequately evaluated in the CEMP, and that the proposed good design and construction practices to be employed will be sufficient to manage these risks. An overview of the CEMP is given in Table 21.1, but this provides no detail, and further information will be required at PEIR.

The scoping impacts do not include changes to groundwater flows and levels caused by the development, other than those impacting Highfield Moss SSSI. Large buildings and other significant infrastructure will be constructed. No proposed foundation details have been given, but we anticipate they will have the potential to affect regional groundwater flow regimes over construction and operational timescales. Given the proximity of the site to potable groundwater abstractions, this must be considered.

When the scheme details are finalised, it will be important to ensure that the proposed activities are compliant with our groundwater protection policies; in particular, in relation to SPZs. The operational effects do not include impacts on receptors from contamination introduced by site activities. The Applicant is proposing a battery storage site, and large areas for storage of unspecified materials. This is a highly sensitive environment, and the impact of these activities must be considered. The Environment Agency may object in principle to, or refuse to permit, some activities or developments if they have potential to adversely affect groundwater. As such, we request that the potential impact on groundwater, SPZ, and potable water abstraction from these sources is scoped into the EIA.

Note: Proposed Battery Energy Storage System (BESS) must have a sealed drainage system in place to contain and manage any fire-fighting effluent or contaminated surface waters generated by a fire at the site. See also the Informative from National Fire Chief's Council (NFCC) at the end of this response.

Water quality is not specifically mentioned in Chapter 14, other than where quoting policy and legislation. We assume that all water quality impacts, including impacts on groundwater, will be considered in Chapter 13 and associated Sustainable Drainage Statement referred to in Section 13.59. This is the justification given in Table 18.5 for scoping out water quality from risks to human health in Chapter 18. We would request confirmation that groundwater quality will be considered in Chapter 13. If this is not the intention, then water quality should be scoped into Chapter 14. In Tables 5.1, 18.5 and 18.6, the determinant is "Water quality **or** availability"; we consider that this should be "Water quality **and** availability" [bold text added for clarity in this response only].

4. Water Quality

We are pleased to see that water quality has been scoped into the assessment for construction and operation of the proposed development (Table 13.4) and that embedded mitigation measures are expected to include an outline surface water drainage strategy (Section 13.84). Embedded pollution control measures to managing contaminated surface water during the operational phase should include contamination arising from the proposed BESS and from across the site.

The Applicant should consider the impacts on surface water from the escape of firewater/foam and any contaminants that it may contain. Suitable environmental protection measures should be provided including systems for containing and managing water run-off. It should be ensured that there are multiple 'layers of protection' to prevent the source-pathway-receptor pollution route occurring. Plans to prevent firewater from causing pollution should align with relevant fire safety management plans to ensure that the application of firewater and firefighting agents

will always be accompanied with appropriate containment. See also the Informative from National Fire Chief's Council (NFCC) at the end of this response.

5. Water Resources

Section 13.44 identifies that the site is located within SPZ3 due to the proximity of multiple public water supply abstraction licences held by United Utilities which surround it. It is unclear which criteria this applies to in Table 13.1 and magnitude does not include impacts to licensed abstractions. We agree that surface water quality and quantity should be scoped in and would expect assessment of pollution risk or mobilisation of existing pollutants should consider public water supply (the closest of which being 1.5km away) as high sensitivity receptors due to their regional importance to water resources supporting human health and economic activity.

Conversely, whilst groundwater abstraction points are identified in the controlled waters section of potential effects, Table 14.3 scopes out impact on receptors from construction related activities. This should be scoped in to be assessed if it is anticipated that mitigation will be required.

Proximity to Highfield Moss SSSI

The adjacent site Highfield Moss SSSI is a water dependent environment with wetland peat and marsh features. The drainage relating to the feature appears to run from north to south and to outfall to the Spittle brook. There are surface water drainage features identified in Section 13.39 to 13.43 which may impact upon the site either directly or further downstream (e.g. attenuation structures which may hold levels).

The proximity to a water sensitive SSSI will mean that de-watering activities and impoundments are not likely to be considered low risk or exempt from regulation. Applications for licences to abstract water or to impound water will need to be sought in these cases.

We are encouraged to see that a hydraulic model of the surface water flow routes within the DCO site is to be assessed as part of the Environmental Statement (ES) and this should consider any effects to the SSSI as is inferred in Section 13.61.

Consumptive uses of potable water supply

Section 13.83 identifies potable water supply as the source for water demand during operation and construction phases. Water demands have not been detailed in the Scoping Report. Construction projects of this scale often require water supply for purposes including but not limited to:

- Concrete production
- Wheel/machinery wash

- Dust suppression
- Potable/domestic supply to welfare stations

These consumptive purposes do not always require treated water and will require an abstraction licence if they are not supplied by the water company. There is water available in this catchment (for more information see the [Abstraction licensing strategy](#)); however, available volumes and restrictions will need to be determined formally via the licensing process. An evaluation of water demands and potential sources of supply is highly recommended at the EIA stage (by means of a basic water supply strategy) in order to identify any problems early or to change approaches to construction or operation processes/design.

6. Waste

The Applicant must consider the implications of the Environmental Protection Act 1990 and ensure they meet their Duty of Care responsibilities for handling and moving waste.

It is noted that the potential environmental impact of illegal handling and disposal of waste has been excluded from the Scoping Report. This is reasonable if the Applicant upholds their Duty of Care obligations at all times. However, we advise that, should waste be transported for recovery, the Applicant must investigate and verify the process that the waste will undergo at the receiving site. This ensures that the waste is not moved to a location that becomes a mere pre-disposal point, rather than a proper recovery site. See our informative regarding the movement of waste off-site at the end of this response.

Importation of Waste

We advise the Applicant to consider reusing waste during the construction phase, where relevant, and in compliance with any applicable legislation. We would expect this to be incorporated into their materials management plan(s).

Storage of Waste

Waste storage may be strategically planned across multiple locations, provided this fall within the limits of waste exemptions.

Waste segregation

On-site segregation will be crucial for complying with the waste hierarchy. Therefore, we advise the Applicant to clearly outline their segregation procedure.

Type of Waste

We advise the Applicant to consider not only whether the waste is hazardous, but also whether it contains other materials, such as gypsum or non-native invasive

species, which require special management to minimize any environmental impact (Section 15.61).

Excavated Materials on Site/Demolition Activity

Excavated materials must be tested for hazardous properties, and we advise that those properties are defined. If the material is not hazardous and can be reused on-site, it would not be considered waste, as per our informative regarding use of waste on-site at the end of the response. If it is hazardous and cannot be reused, it must be stored appropriately and removed by an authorized entity, accompanied by a Consignment Note, in accordance with Duty of Care. As the producer, the Applicant must also classify the waste using WM3 Technical Guidance, which is an omission of the Scoping Report.

For further information and guidance, see the suite of waste related informatives at the end of this response.

7. Informatives / Advice to Applicant

7.1. Environmental Permit – Flood Risk Activity Permit (FRAP)

The Environmental Permitting (England and Wales) Regulations 2016 require a permit or exemption to be obtained for any activities which will take place:

- on or within 8 metres of a main river (16 metres if tidal)
- on or within 8 metres of a flood defence structure or culverted main river (16 metres if tidal)
- on or within 16 metres of a sea defence
- involving quarrying or excavation within 16 metres of any main river, flood defence (including a remote defence) or culvert
- in the floodplain of a main river if the activity could affect flood flow or storage and potential impacts are not controlled by a planning permission

For further guidance please visit <https://www.gov.uk/guidance/flood-risk-activities-environmental-permits>.

If this type of permit is required, we advise the Applicant to consult with us at the earliest opportunity.

7.2. Wildlife Trusts

We recommend that the Applicant consults the Lancashire, Manchester and North Merseyside Wildlife Trust with regards to assessing impacts, to give them the opportunity to raise any concerns.

7.3. BESS Site Design

The National Fire Chief's Council has published detailed guidance on recommended fire protection measures for BESS sites. We recommend the Applicant refers to this when designing the scheme: [Grid Scale Battery Energy Storage System planning – Guidance for FRS \(nfcc.org.uk\)](https://www.nfcc.org.uk/guidance-for-frs)

7.4. Environmental Permits – Groundwater

If dewatering is required, it may require an environmental permit if it doesn't meet the exemption in The Water Abstraction and Impounding (Exemptions) Regulations 2017 Section 5: Small scale dewatering in the course of building or engineering works. [Temporary dewatering from excavations to surface water: RPS 261 - GOV.UK \(www.gov.uk\)](https://www.gov.uk/guidance/rps-261)

If the work doesn't meet the exemption and requires a full abstraction licence, Applicants should be aware that some aquifer units may be closed for new consumptive abstractions in this area. More information can be found here: [Abstraction licensing strategies \(CAMS process\) - GOV.UK \(www.gov.uk\)](https://www.gov.uk/guidance/abstraction-licensing-strategies-cams-process)

Please note that the typical timescale to process a licence application is 9-12 months. The Applicant may wish to consider whether a scheme-wide dewatering application rather than individual applications would be beneficial. We suggest talking to our National Permitting Service early in the project planning.

The Applicant may also need to consider discharge of groundwater, especially if it is contaminated. More information can be found here: [Discharges to surface water and groundwater: environmental permits - GOV.UK.](https://www.gov.uk/guidance/discharges-to-surface-water-and-groundwater-environmental-permits)

The use of drilling muds for the directional drilling may require a groundwater activity permit unless the 'de minimis' exemption applies. Early discussion about this is also recommended.

If Environment Agency permit/authorisation is required, we recommend engaging with our National Permitting Service as early as possible. Please also see the following pre-application advice: <https://www.gov.uk/guidance/get-advice-before-you-apply-for-an-environmental-permit>

7.5. Environmental Permits – Waste

The following guidance covers waste authorisations only: <https://www.gov.uk/guidance/waste-environmental-permits>

7.5.1. Movement of waste off-site – Duty of Care

The Environmental Protection (Duty of Care) Regulations 1991 for dealing with waste materials are applicable to any off-site movements of wastes.

The code of practice applies to you if you produce, carry, keep, dispose of, treat, import or have control of waste in England or Wales.

The law requires anyone dealing with waste to keep it safe and make sure it's dealt with responsibly and only given to businesses authorised to take it. The code of practice can be found here:

https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/506917/waste-duty-care-code-practice-2016.pdf

If you need to register as a carrier of waste, please follow the instructions here:

<https://www.gov.uk/register-as-a-waste-carrier-broker-or-dealer-wales>

7.5.2. Waste on site – contaminated land

Excavated materials that are recovered via a treatment operation can be re-used on-site under the CL:AIRE Definition of Waste: Development Industry Code of Practice. This voluntary Code of Practice provides a framework for determining whether excavated material arising from site during remediation or land development works are waste.

Developers should ensure that all contaminated materials are adequately characterised both chemically and physically, and that the permitting status of any proposed on-site operations are clear. If in doubt, the Environment Agency should be contacted for advice at an early stage to avoid any delays.

The Environment Agency recommends that developers should refer to:

- [CL:AIRE Definition of Waste: Code of Practice](#)
- [EA Regulatory Position Statement 215: Treating small volumes of contaminated soil and groundwater](#)

7.5.3. Waste to be taken off site – contaminated land

Contaminated soil that is, or must be, disposed of, is waste. Therefore, its handling, transport, treatment and disposal is subject to waste management legislation, which includes:

- Duty of Care Regulations 1991
- Hazardous Waste (England and Wales) Regulations 2005
- Environmental Permitting (England and Wales) Regulations 2010
- The Waste (England and Wales) Regulations 2011

Developers should ensure that all contaminated materials are adequately characterised both chemically and physically in line with British Standards BS EN 14899:2005 'Characterisation of Waste - Sampling of Waste Materials - Framework

for the Preparation and Application of a Sampling Plan'. The permitting status of any proposed treatment or disposal activity should be clear. If in doubt, the Environment Agency should be contacted for advice at an early stage to avoid any delays.

If the total quantity of waste material to be produced at or taken off site is hazardous waste and is 500kg or greater in any 12-month period, the developer will need to register with us as a hazardous waste producer. Refer to our website at www.gov.uk/government/organisations/environment-agency for more information.

7.5.4. Movement of waste off-site – Duty of Care & Carriers, Brokers and Dealers Regulations Characterisation and classification of waste

In order to meet the Applicant's objectives for the waste hierarchy and obligations under the duty of care, it is important that waste is properly classified. Some waste (e.g. wood and wood based products) may be either a hazardous or non-hazardous waste dependent upon whether or not they have had preservative treatments.

Proper classification of the waste both ensures compliance and enables the correct onward handling and treatment to be applied. In the case of treated wood, it may require high temperature incineration in a directive compliant facility. More information on this can be found here: <https://www.gov.uk/how-to-classify-different-types-of-waste>

7.5.5. Use of waste on-site – authorisation or permit required

If materials that are potentially waste are to be used on-site, the Applicant will need to ensure they can comply with the exclusion from the Waste Framework Directive (WFD) (article 2(1) (c)) for the use of, 'uncontaminated soil and other naturally occurring material excavated in the course of construction activities, etc...' in order for the material not to be considered as waste. Meeting these criteria will mean waste permitting requirements do not apply.

Where the Applicant cannot meet the criteria, they will be required to obtain the appropriate waste permit or exemption from the Environment Agency.

A deposit of waste to land will either be a disposal or a recovery activity. The legal test for recovery is set out in Article 3(15) of WFD as:

- any operation the principal result of which is waste serving a useful purpose by replacing other materials which would otherwise have been used to fulfil a particular function, or waste being prepared to fulfil that function, in the plant or in the wider economy.
- We have produced guidance on the recovery test which can be viewed at <https://www.gov.uk/government/publications/deposit-for-recovery-operators-environmental-permits/waste-recovery-plans-and-deposit-for-recovery->

[permits#how-to-apply-for-an-environmental-permit-to-permanently-deposit-waste-on-land-as-a-recovery-activity](#).

You can find more information on the Waste Framework Directive here:

<https://www.gov.uk/government/publications/environmental-permitting-guidance-the-waste-framework-directive>

More information on the definition of waste can be found here:

<https://www.gov.uk/government/publications/legal-definition-of-waste-guidance>

More information on the use of waste in exempt activities can be found here:

<https://www.gov.uk/government/collections/waste-exemptions-using-waste>

Non-waste activities are not regulated by us (i.e. activities carried out under the CL:ARE Code of Practice), however you will need to decide if materials meet End of Waste or By-products criteria (as defined by the Waste Framework Directive). The 'Is it waste' tool, allows you to make an assessment and can be found here:

<https://www.gov.uk/government/publications/isitwaste-tool-for-advice-on-the-by-products-and-end-of-waste-tests>

The direct link to CLA:RE can be found here: <https://www.claire.co.uk/projects-and-initiatives/dow-cop>

7.5.6. [The waste hierarchy and resource management in relation to construction wastes](#)

The developer must apply the waste hierarchy as a priority order of prevention, re-use, recycling before considering other recovery or disposal options. Government guidance on the waste hierarchy in England can be found here:

https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/69403/pb13530-waste-hierarchy-guidance.pdf

Site Waste Management Plans (SWMP) are no longer a legal requirement, however, in terms of meeting the objectives of the waste hierarchy and your duty of care, they are a useful tool and considered to be best practice.

7.5.7. [Management and reporting systems](#)

Where a development involves any significant construction or related activities, we would recommend using a management and reporting system to minimise and track the fate of construction wastes, such as that set out in PAS402: 2013, or an appropriate equivalent assurance methodology. This should ensure that any waste contractors employed are suitably responsible in ensuring waste only goes to legitimate destinations.

If Environment Agency permit/authorisation is required, we recommend engaging with our National Permitting Service as early as possible. Please also see the following pre-application advice: <https://www.gov.uk/guidance/get-advice-before-you-apply-for-an-environmental-permit>

7.6. Sustainable drainage systems

The Government's expectation is that sustainable drainage systems (SuDS) will be provided in new developments wherever this is appropriate. The Environment Agency supports this expectation. Where infiltration SuDS are to be used for surface run-off from roads, car parking and public or amenity areas, they should:

- be suitably designed
- meet Government's non-statutory technical standards for sustainable drainage systems – these standards should be used in conjunction with the National Planning Policy Framework and Planning Practice Guidance
- use a SuDS management treatment train – that is, use drainage components in series to achieve a robust surface water management system that does not pose an unacceptable risk of pollution to groundwater

Where infiltration SuDS are proposed for anything other than clean roof drainage in a SPZ1, a hydrogeological risk assessment should be undertaken, to ensure that the system does not pose an unacceptable risk to the source of supply.

See the Environment Agency's approach to groundwater protection, position statement G13: [Groundwater protection position statements - GOV.UK](http://www.gov.uk) (www.gov.uk)

We trust that this information is of use to you.

If you require any further details, please do not hesitate to contact me on the details below.

Yours sincerely,

Siobhan Martin
Planning Advisor
National Infrastructure Team

Email: NITeam@environment-agency.gov.uk

Dear Claire,

Thank you for your letter (attached) about the scoping consultation for the application by Intermodal Logistics Park North Limited for an Order granting Development Consent for the Intermodal Logistics Park North.

We have no comments to make in relation to this.

Kind regards

Alex

Alex McDyre
(Pronouns: he/him)

Senior Planner - Planning Strategy
Place Making Directorate
Greater Manchester Combined Authority
Tootal Buildings, 56 Oxford Street, Manchester, M1 6EU
M: [REDACTED]
E: [REDACTED]@greatermanchester-ca.gov.uk



Hello,

Thank you for your EIA Scoping Request Letter and Report dated 5th November 2024.

Please be advised that Halton Borough Council has no comment to make with the exception of the attached response from the Council's Environmental Health Officer.

Many thanks

Nicola

Policy, Planning and Transportation

Municipal Building

Widnes

Cheshire

WA8 7QF

To Glen Henry

Date 29/11/2024

Dept. Planning

Ref 24/08065/PREAPP

From Environmental Protection

Planning Consultation Response

Scoping consultation - Nationally Significant Infrastructure Project

Application by Intermodal Logistics Park North Limited (the Applicant) for an Order granting Development Consent for the Intermodal Logistics Park North (the Proposed Development).

Comments

This proposal seeks to build a new rail terminal at Newton-le-Willows in St Helens with the purpose of diverting road freight onto the rail network, particularly the Chat Moss Line, which does not pass through Halton at any point, and the West Coast Mainline, which does.

This will likely result in an increase in freight rail traffic on the West Coast Mainline. It is understood that there is a lack of daytime capacity on the West Coast Mainline¹, and so this increase would seem to be more likely at night.

For the benefit of the applicant, the map extract shown in figure 1 shows the route of the West Coast Mainline as it passes through Halton, from Moore in the north to Preston Brook in the south. The area outlined in orange is currently undergoing extensive residential development, with some mixed use development closer to the M56 motorway.

Likelihood of increased freight rail and subsequent noise impacts at night

As part of the development in the highlighted area, developers have submitted various acoustic reports in support of their planning applications. From reviewing a selection of these reports produced between 2015-2017, it can be calculated that on this section of track there are approximately 5.9 trains passing per hour during the daytime (7am – 11pm), falling to approximately 3.8 trains passing per hour during the night.

¹ Source: [Technical Annex: Demand and Capacity Pressures on the West Coast Main Line](#)

During the day freight trains account for 32.9% of all trains whereas at night this increases to 66.7% of all trains. Meanwhile the average noise level of an individual train pass is approximately 15dB(A) louder during the night, at 85-90dB(A), which is reflective of the increased noise levels which can be observed from freight trains.

In line with British Standards, the LAeq 'average' sound level however has been calculated within these reports to be 64dB(A) at 10m from the track during the day and 65dB(A) at night.

If there is a significant increase in rail traffic at night, possibly equalling or exceeding daytime rail traffic levels, the average sound levels at night would also increase. This could in turn mean that the mitigation measures as currently installed at some properties will become insufficient as they will exceed those specified in BS 8233:2014 - Guidance on sound insulation and noise reduction for buildings, and the residents of these properties be subjected to unacceptably high noise levels at night.

Within the scoping report provided by the applicant, modelling for the increase in freight rail traffic in the future is discussed, but not provided at this stage.

It would therefore be beneficial to be provided with this modelling data as soon as possible, so that planning applicants whose developments adjoin the West Coast Mainline, but who have not yet received full planning permission, or that future applicants can be referred to these figures when calculating the noise mitigation requirements for their developments.

Affect of Increased Exposure to Railway noise to Halton Residents

In addition to newly developed residential areas as discussed, there are also several other pre existing residential streets in Halton which have properties that adjoin the West Coast Mainline and these could all be negatively impacted by noise from increased rail freight traffic at night, these are listed below;

Lindfield Close
Beechmore
Hollybank
Runcorn Road
Dukes Wharf
The Wharf
Chester Road
Gorsewell Ln
Bridgewater Grange
Tunnel End

Paragraphs 18.6 and 18.7 of the scoping report discusses the National Policy Statement for National Networks states that 'new or enhanced national network infrastructure may have direct impacts on health because of traffic, noise, vibration, air quality and emissions, light pollution, community severance, dust, odour, polluting water, hazardous waste and pests' and so as such the applicant should 'identify measures to avoid, mitigate or as a last resort compensate for adverse health impacts as appropriate'.

The scoping report however then only goes on to discuss the impacts on the boroughs of St Helens, Wigan and Warrington.

On this basis we would also request the applicant to please confirm that their scope will include the study of the effects of increased freight rail traffic to the residents of Halton and where potential health impacts are identified, Halton Borough Council will be contacted to discuss the applicants proposals to mitigate against this.

Kind Regards,

Phillip Wilson
Enviromental Health Officer



Figure 1

West Coast Mainline through Halton



Historic England

Direct Dial: [REDACTED]

Our Ref: PL00796240

Claire Deery
Senior EIA Advisor
The Planning Inspectorate
Environmental Services
Operations Group 3
Temple Quay House
2 The Square
Bristol, BS1 6PN

2 December 2024

Dear Ms Deery

**Planning Act 2008 (as amended) and The Infrastructure Planning (Environmental Impact Assessment) Regulations 2017
(the EIA Regulations) - Regulations 10 and 11**

Application by Intermodal Logistics Park North Limited (the Applicant) for an Order granting Development Consent for the Intermodal Logistics Park North (the Proposed Development)

Your reference: TR051001

Thank you for your letter of 5 November 2024 consulting Historic England about the above EIA Scoping Report. The Proposed Development could, potentially, have an impact upon a number of designated heritage assets and their settings on and around the site of the Proposed Development. We would expect the Environmental Report to contain a thorough assessment of the likely effects which the proposed development might have upon those elements which contribute to the significance of these assets.

We would also expect the Environment Report to consider the potential impacts which the proposals might have upon un-designated heritage assets. These ought to be included as they are valued components of the historic environment.

We would expect the assessment to clearly demonstrate that the extent of the proposed study area is of the appropriate size to ensure that all heritage assets likely to be affected by this development have been included and can be properly assessed. It is important that the Assessment is designed to ensure that all impacts are fully understood, using where necessary techniques such as photomontages to illustrate



SUITES 3.3 AND 3.4 CANADA HOUSE 3 CHEPSTOW STREET MANCHESTER M1 5FW

Telephone 0161 242 1416
HistoricEngland.org.uk

Historic England is subject to both the Freedom of Information Act (2000) and Environmental Information Regulations (2004). Any Information held by the organisation can be requested for release under this legislation.



and assess setting impacts. Historic England would welcome the opportunity to assist in agreeing suitable viewpoints for these.

The submitted Scoping Report proposes an appropriate study area, in our view, extending 1km from the red line boundary around the site of the Proposed Development. Within this area the applicants appear to have identified known designated heritage assets. In identifying these assets, they appear to have consulted most appropriate sources of information, including the National Heritage List for England and the Greater Manchester and Merseyside Historic Environment Records (HERs). However, we note that the source of information for heritage assets within the boundary of Warrington Council is given at 11.9 as the Greater Manchester HER. The HER for Warrington is included within that for Cheshire, and we strongly recommend that the Cheshire HER be consulted in the course of compiling the ES.

Whilst we consider that the assessment methodology proposed is broadly in line with current best practice, we would take issue with the suggestion in Table 11.1 ('Sensitivity Classification') that Grade II Listed Assets should be accorded only Medium heritage value. Grade II listing is a national designation, and Grade II listed assets should therefore be accorded High heritage value alongside other nationally designated assets. The table makes no mention of Registered Battlefields, which given that a small portion of one actually falls within the red line boundary, ought to be included in this same category.

The assessment should also take account of the potential impact which associated activities (such as construction activity, servicing and maintenance, and associated traffic) might have upon perceptions, understanding and appreciation of the heritage assets in the area.

Subject to the above comments, Historic England agrees with the summaries of Built Heritage and Archaeology impacts proposed to be scoped in and out of the EIA set out in Tables 11.4 and 12.4 respectively.

In this connection, it is important that the conservation staff and archaeological advisors of the local authority areas in which the Proposed Development is sited are involved in the development of the assessment. They are best placed to advise on local historic environment issues and priorities, how the proposals can be tailored to minimise potential adverse impacts on the historic environment, and the nature and design of any required mitigation measures, together with opportunities for securing wider benefits for the future conservation and management of heritage assets. It appears from the information contained in the Scoping Report that they have been fully consulted on the work that has taken place to date, and we would expect them to



SUITES 3.3 AND 3.4 CANADA HOUSE 3 CHEPSTOW STREET MANCHESTER M1 5FW

Telephone 0161 242 1416
HistoricEngland.org.uk



Historic England

continue to be so as the work proceeds.

Historic England considers that, subject to minor revisions to the assessment methodology, an EIA carried out in accordance with the proposals set out in the Scoping Report should provide an accurate assessment of the impact of the Proposed Development upon the historic environment.

Yours Sincerely

Andrew Davison
Inspector of Ancient Monuments
E-mail: [REDACTED]@HistoricEngland.org.uk



SUITES 3.3 AND 3.4 CANADA HOUSE 3 CHEPSTOW STREET MANCHESTER M1 5FW

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Historic England is subject to both the Freedom of Information Act (2000) and Environmental Information Regulations (2004). Any Information held by the organisation can be requested for release under this legislation.

CEMHD Policy - Land Use Planning,
NSIP Consultations,
Building 1.2,
Redgrave Court,
Merton Road,
Bootle, Merseyside
L20 7HS.

HSE email: NSIP.applications@hse.gov.uk

ilpnorth@planninginspectorate.gov.uk

Dear Mr Bromwell

Date: 13 November 2024

**PROPOSED INTERMODAL LOGISTICS PARK NORTH (the project)
PROPOSAL BY INTERMODAL LOGISTICS PARK NORTH LIMITED (the applicant)
INFRASTRUCTURE PLANNING (ENVIRONMENTAL IMPACT ASSESSMENT) REGULATIONS 2017 (as
amended) REGULATIONS 10 and 11**

Thank you for your letter of 5 November 2024 regarding the information to be provided in an environmental statement relating to the above project. HSE does not comment on EIA Scoping Reports but the following information is likely to be useful to the applicant.

HSE's land use planning advice

CEMHD5 Contribution to Consultation

1. With reference to the redlined **DRAFT order limits** boundary shown on **FIGURE 1.1 DRAFT ORDER LIMITS [Intermodal Logistics Park North Ltd, INTERMODAL LOGISTICS PARK (ILP) NORTH, Intermodal Logistics Park (ILP) North Strategic Rail Freight Interchange (SRFI), Project reference TR510001, Request for an EIA scoping opinion, November 2024. <https://nsip-documents.planninginspectorate.gov.uk/published-documents/TR0510001-000004-TR051001%20-%20Scoping%20Report.pdf>** the proposed project does not fall within the consultation distances of any Major Hazard Installation(s) or Major Accident Hazard Pipeline(s).
2. Please note if at any time a new Major Accident Hazard Pipeline is introduced or existing Pipeline modified prior to the determination of a future application, then the HSE reserves the right to revise its advice.
3. Likewise, if prior to the determination of a future application, a Hazardous Substances Consent is granted for a new Major Hazard Installation or a Hazardous Substances Consent is varied for an existing Major Hazard Installation in the vicinity of the proposed development, again the HSE reserves the right to revise its advice.

Would Hazardous Substances Consent be needed?

4. The presence of hazardous substances on, over or under land at or above set threshold quantities (Controlled Quantities) may require Hazardous Substances Consent (HSC) under the Planning (Hazardous Substances) Act 1990 as amended. The substances, alone or when aggregated with others, for which HSC is required, and the associated Controlled Quantities, are set out in The Planning (Hazardous Substances) Regulations 2015.

5. Hazardous Substances Consent would be required if the proposed development site is intending to store or use any of the Named Hazardous Substances or Categories of Substances and Preparations at or above the controlled quantities set out in schedule 1 of these Regulations.
6. Further information on HSC should be sought from the relevant Hazardous Substances Authority.

Explosives sites

HSE has no comment to make as there are no licensed explosives sites in the vicinity.

Electrical Safety

No comment from a planning perspective.

At this time, please send any further communication on this project directly to the HSE's designated e-mail account for NSIP applications at nsip.applications@hse.gov.uk . We are currently unable to accept hard copies, as our offices have limited access.

Yours sincerely



Cathy Williams
CEMHD4 NSIP Consultation Team

From: [Completionpacks](#)
To: [Intermodal Logistics Park North](#); [Completionpacks](#)
Subject: RE: TR0510001 - EIA Scoping Notification and Consultation
Date: 20 November 2024 10:43:25
Attachments: [image001.jpg](#)
[image002.png](#)
[image003.png](#)
[image004.png](#)
[image007.png](#)
[image008.png](#)
[image009.png](#)
[image010.jpg](#)
[image006.png](#)

Hi,
I can confirm that Indigo are not affected by these works
Thank you
Laura

Laura Collier | Asset Engagement Officer

Please note our dedicated completions Inbox Email:

Indigo Networks

M: [REDACTED]@indigonetworks.co.uk

We have a new Head Office!

Please make a note of our new address below and we kindly ask that you update your records accordingly.

A close-up of a logo Description automatically generated



[Follow us on LinkedIn](#)

From: Intermodal Logistics Park North [REDACTED]
Sent: Monday, November 18, 2024 9:00 AM
To: Completionpacks <[REDACTED]>
Subject: RE: TR0510001 - EIA Scoping Notification and Consultation

You don't often get email from [REDACTED]. [Learn why this is important](#)

Dear Laura,

The applicant has confirmed the following details in relation to your request:

Approximate coordinates for the site are 53.450925, -2.587454. The postcode to the adjacent houses is: WA2 8ST.

Kind regards

Claire Deery

From: Completionpacks [REDACTED]
Sent: Monday, November 11, 2024 11:30 AM
To: Intermodal Logistics Park North [REDACTED]
Cc: Completionpacks [REDACTED]
Subject: RE: TR0510001 - EIA Scoping Notification and Consultation

Our ref: NW_PINLO
Your ref: TR0510001

Environmental Services
Operations Group 3
Temple Quay House
2 The Square
Bristol
BS1 6PN

Adam Johnson
National Highways
Piccadilly Gate
Store Street
Manchester
M1 2WD

Tel: [REDACTED]

26 November 2024

Dear Sir / Madam

Application by Intermodal Logistics Park North Limited (the Applicant) for an Order granting Development Consent for the Intermodal Logistics Park North (the Proposed Development)

National Highways has been appointed by the Secretary of State for Transport as a strategic highway company under the provisions of the Infrastructure Act 2015. We are responsible for operating, maintaining and improving the Strategic Road Network (SRN) in England, in accordance with the Licence issued by the Secretary of State for Transport (April 2015) and Government policies and objectives.

Our response to this consultation on the Intermodal Logistics Park North Rail Freight Interchange ('the Project') submitted by Intermodal Logistics Park North Limited ('the Applicant') is written in the context of statutory responsibilities as set out in National Highways' Licence, and in the light of Government policy and regulation, including the:

- National Planning Policy Framework (NPPF);
- Town and Country Planning Development Management (Procedure) Order (England) 2015 (DMPO); and
- DfT Circular 01/2022 The Strategic Road Network and the delivery of sustainable development ('the Circular').

As a statutory consultee in the planning system, National Highways has a regulatory duty to co-operate. Consequently, we are obliged to give consideration to all proposals received and to provide appropriate, timely and substantive responses.

Following a review of the provided documentation for the Project, National Highways is content that the approach set out in the EIA Scoping Opinion (ESO) is consistent with the principles of the Institute of Environmental Management and Assessment guidance. There are, however, a number of matters identified through this review that should be taken into consideration as the project moves forward.

National Highways Policy and Guidance

National Highways' policy regarding its involvement in the Planning system is found within DfT Circular 01/2022, as referenced above. This document sets out how we will engage with applicants and Planning Authorities and assists in determining our responses to planning applications. In particular, The Circular states at paragraph 55 that:

“55. The company will engage in the relevant screening or scoping process where a potential impact on the SRN is identified. Environmental assessments must be comprehensive enough to establish the likely impacts on air quality, light pollution and noise arising from traffic generated by a development, along with the impacts from any proposed works to the SRN and identify measures to mitigate these impacts. Requirements and advice for undertaking environmental assessments in respect of transport impacts can be found in the DMRB [Design Manual for Roads and Bridges].”

It is therefore recommended that the Applicant's transport consultants fully familiarise themselves with this policy alongside our Planning for the Future Guidance (2023), which supports the Circular. This includes, in relation to Environmental Impact:

“45. Development promoters will need to provide sufficient environmental information to satisfy the relevant local planning authority, and any other consenting authorities, that all environmental implications of the proposals have been appropriately considered.

46. We will expect to see measures implemented that fully mitigate all environmental impacts arising from and relating to the interaction between developments and the SRN. There are four aspects to this:

- *The environmental impacts arising from the temporary construction works.*
- *The environmental impacts of the permanent transport solution associated with the development.*
- *The environmental impacts of the road network upon the development itself (for example, vehicle emissions).*
- *The environmental impacts of any decommissioning phase.”*

It is noted that the ESO Chapter 5 (Summary of Proposed EIA Scope) that construction traffic has been scoped out of the Transport Chapter. We would suggest that at this time there is insufficient information to conclude that this should be scoped out, paying cognisance of paragraph 46 above.

Development Proposal

Paragraph 1.8 of the ESO sets out that the generic purpose of the proposed development is explained in the Department for Transport's National Policy Statement for National Networks:

“For many freight movements, rail is unable to undertake a full end-to-end journey for the goods concerned. The aim of a strategic rail freight interchange (SRFI) is to optimise the use of rail in the freight journey by maximising the long-haul primary trunk journey by rail and minimising some elements of the secondary distribution (final delivery) leg by road, through co-location of other distribution and freight activities. SRFIs need to be supported at both ends by connections to rail infrastructure and logistics terminals. SRFIs are also typically associated with intermodal traffic. A fully effective network of SRFIs, supported by smaller-scale rail freight interchanges, will help to enable the sector to reach its full potential.”

The ESO acknowledges that the extent of off-site highway works is unclear at this stage. Given the nature of the Project, identification of any highway works (mitigation) required at the SRN is an issue of fundamental importance for National Highways. It is highly likely that the SRN will be relied upon for the majority of the 'secondary distribution' leg, but at present it is not known what form that will take nor the likely number of trips that this will constitute. For example, warehouses offering direct-to-customer, van-based distribution would differ in trip rate, type and timings to those sites operating only using Heavy Good Vehicles (HGV).

We would suggest that the Technical Transport Reports (most likely the Transport Assessment) would need to reflect the flexibility afforded to the varying types of uses for the site through the use of appropriate scenario testing. Paragraphs 48 and 49 of the Circular discuss this scenario testing and the vision-led approach to planning supported by National Highways.

We would further suggest that any part of the Project's warehousing that is operational before the rail component is in place would effectively operate as 'road to road' logistics, which would again need to be explored as part of the scenario testing for the site. The propensity for these early sites to switch from 'road to road' to 'rail to road' should also be

considered, as this would impact the long-term viability of the rail-freight interchange and its effect on the SRN.

It would also be useful for National Highways to understand the impact this site may have on other freight locations within the Liverpool City Region and wider area, in particular if there would likely be any interaction between this site and the Port of Liverpool. Vehicles travelling by road between these two locations would likely have an impact on already-congested SRN routes.

It is noted that the Project will also provide an overnight lorry park for users of the site. We would suggest that there may be an opportunity to extend the use of any overnight lorry parking facilities to the serve the full Parkside allocation, providing wider benefit for the whole site. The benefits of this are outlined in the Future of Freight Plan, 'Planning reforms for lorry parking' Written Ministerial Statement (November 2021) and the NPPF that development proposals for new or expanded goods distribution centres should make sufficient provision for HGV drivers.

Baseline Conditions and Main Issues

This section does not provide a clear assessment of baseline conditions or detail how this will be provided. However, it is noted that traffic data collection to support update of the Parkside Link Road SATURN Model (ESO Paragraph 6.94) does provide updated baseline traffic information.

We would further comment that it is anticipated information relating to Baseline Conditions will form part of the Transport Assessment and other Transport Technical Reports, and they will be used to inform the ES Transport Chapter. It is anticipated that further (more detailed) information relating to the above Transport Reports will be provided in due course by the Applicant's transport consultants for review and agreement.

Scope and Methodology of Assessment

At this stage, the scope of SRN to be considered in the EIA (and the transport assessment) as a minimum should include:

- M6 Junction 21a
- M6 Junction 22
- M6 Junction 23
- M6 Junction 24 (depending on traffic routing & impact)
- M62 Junction 9

Dependent on vehicle trips and their distribution, this area may need to be widened in the future. It is recognised in the ESO that the assessment methodologies for the various Transport Technical Reports are being prepared and will be agreed through consultation with the relevant authorities. We would look to be a part of this process to ensure that the needs of the SRN are met.

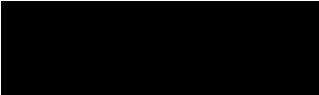
Conclusion

A key point of note at this stage is the requirement of the Circular regarding Environmental Assessment in that the impacts from any proposed works to the SRN (including measures to mitigate these impacts) is to be included in the EIA when considering development proposals.

In the case of this Project, the final scale and form of the highway mitigation at the SRN is yet to be determined. It should therefore be recognised at this early stage that if the highway mitigation required at the SRN is of a significant scale, the works could potentially give rise to environmental impact that will need to be considered.

It is further noted that the Applicant has recently formed a Transport Steering Group which will be a key forum for National Highways and the local highway authorities to progress transport matter relating to the DCO application with the Applicant and their transport consultant. We look forward to working with the Applicant as this site develops.

Yours faithfully



Adam Johnson
Spatial Planning Team
Email: [redacted]@nationalhighways.co.uk



Date: 03 December 2024
Our ref: 492723
Your ref: TR051001



Claire Deery
Planning Inspectorate
ilpnorth@planninginspectorate.gov.uk

Consultations
Hornbeam House
Crewe Business Park
Electra Way
Crewe
Cheshire
CW1 6GJ

T 0300 060 900

BY EMAIL ONLY

Dear Ms Deery

Environmental Impact Assessment Scoping Consultation under Regulation 10 of the Infrastructure Planning (Environmental Impact Assessment) Regulations 2017 (the EIA Regulations) – Regulation 11

Proposal: Intermodal Logistics Park North Ltd - Strategic Rail Freight Interchange (SRF.)

Thank you for seeking our advice on the scope of the Environmental Statement (ES) in the consultation dated 05 November 2024, received on 05 November 2024.

Natural England is a non-departmental public body. Our statutory purpose is to ensure that the natural environment is conserved, enhanced, and managed for the benefit of present and future generations, thereby contributing to sustainable development.

Natural England welcomes the opportunity to engage at this early stage so that our comments can be considered in future iterations of the Environmental Information and inform the production of a robust Environmental Statement (ES).

A robust assessment of environmental impacts and opportunities, based on relevant and up to date environmental information, should be undertaken prior to an application for a Development Consent Order (DCO). A summary of key issues is provided below along with our detailed advice on the scope of the Environmental Impact Assessment (EIA) for the proposal within Annex A.

Summary of Key Issues

Impacts on designated nature conservation sites

Natural England does not agree that all the relevant internationally designated sites have been scoped in for assessment, and advise further assessment due to impacts via air quality is required for the following:

- Manchester Mosses Special Area of Conservation (SAC)
- Rixton Clay Pits SAC

Impacts on soils and agricultural land

- Natural England does not agree that impacts on the loss of Soils and Geology as a resource can be scoped out of the Environmental Statement. The project may result in the loss of over 20ha of best and most versatile (BMV) agricultural land, and further consideration is required.

Natural England has set up a Discretionary Advice Service (DAS) arrangement with the applicant and will engage further with the applicant as the project progresses, including the issues highlighted in this letter.

For any new consultations, or to provide further information on this consultation please send your correspondence to consultations@naturalengland.org.uk.

Yours sincerely

Alice Watson
Senior Officer – Sustainable Development & Nationally Significant Infrastructure Projects
Cheshire, Greater Manchester, Merseyside and Lancashire Area Team

Annex A – Natural England’s Advice on EIA Scoping

1. General principles

1.1 Regulation 11 of the Infrastructure Planning Regulations 2017 - (The EIA Regulations) sets out the information that should be included in an Environmental Statement to assess impacts on the natural environment. Natural England advise the Scoping Report at this stage does not include the following:

- Appropriately scaled and referenced plans which clearly show the information and features associated with the development. Natural England note the Scoping Report whilst providing a detailed description of the development and site within sections 2.2 to 2.7, and within Chapter 3, it does not include any proposed layout or reference plans.
- An assessment of alternatives and clear reasoning as to why the preferred option has been chosen.
- A description of the aspects and matters requested to be scoped out of further assessment with adequate justification provided¹. Table 5.1 includes a list of construction and operation effects that have been scoped in or out for the Environmental Assessment, and Natural England advise we do not concur the impacts on Manchester Mosses Special Area of Conservation (SAC) and Rixton Clay Pits SAC, and loss of Soils and Geology as a resource should be scoped out at this stage. Insufficient information has been provided within the report to justify the scoping out of these effects. Please see our comments below under *Internationally designated sites* and *Soils and agricultural land quality* for our detailed comments.

2. Cumulative and in-combination effects

2.1 The ES should fully consider the implications of the whole development proposal. This should include an assessment of all supporting infrastructure.

2.2 An impact assessment should 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. Natural England welcome that section 20.10 includes details of sources that will be used to inform the assessment for other plans/projects.

2.3 We advise the following types of projects should be included in such an assessment (subject to available information):

- a. existing 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 the consenting authorities; and
- e. plans and projects which are reasonably foreseeable, i.e. 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

¹ National Infrastructure Planning [Advice Note Seven, Environmental Impact Assessment, Process, Preliminary Environmental Information and Environmental Statements](#) (see Insert 2 – information to be provided with a scoping request)

available to assess the likelihood of cumulative and in-combination effects.

3. Environmental data

- 3.1 Natural England is required to make available information it holds where requested to do so. National datasets held by Natural England are available at <http://www.naturalengland.org.uk/publications/data/default.aspx>.
- 3.2 Detailed information on the natural environment is available at www.magic.gov.uk. This includes Marine Conservation Zone GIS shapefiles.
- 3.3 Natural England's SSSI Impact Risk Zones are a GIS dataset which can be used to help identify the potential for the development to impact on a SSSI. The dataset and user guidance can be accessed from the [Natural England Open Data Geoportal](#).
- 3.4 Natural England does not hold local information on local sites, local landscape character, priority habitats and species or protected species. Local environmental data should be obtained from the appropriate local bodies. This may include the local environmental records centre, the local Wildlife Trust, local geo-conservation group or other recording society.

4. Chapter 7 - Air quality

Air quality assessment

- 4.1 Air quality in the UK has improved over recent decades but air pollution remains a significant issue. For example, approximately 85% of protected nature conservation sites are currently in exceedance of nitrogen levels where harm is expected (critical load) and approximately 87% of sites exceed the level of ammonia where harm is expected for lower plants (critical level of 1µg)^[1]. A priority action in the England Biodiversity Strategy is to reduce air pollution impacts on biodiversity. The Government's Clean Air Strategy also has a number of targets to reduce emissions including to reduce damaging deposition of reactive forms of nitrogen by 17% over England's protected priority sensitive habitats by 2030, to reduce emissions of ammonia against the 2005 baseline by 16% by 2030 and to reduce emissions of NO_x and SO₂ against a 2005 baseline of 73% and 88% respectively by 2030. Shared Nitrogen Action Plans (SNAPs) have also been identified as a tool to reduce environmental damage from air pollution.
- 4.2 The planning system plays a key role in determining the location of developments which may give rise to pollution, either directly, or from traffic generation, and hence planning decisions can have a significant impact on the quality of air, water and land. The ES should take account of the risks of air pollution and how these can be managed or reduced. This should include taking account of any strategic solutions or SNAPs, which may be being developed or implemented to mitigate the impacts of air quality. Further information on air pollution impacts and the sensitivity of different habitats/designated sites can be found on the Air Pollution Information System (APIS) (www.apis.ac.uk).
- 4.3 Natural England has produced guidance for public bodies to help assess the impacts

^[1] [Report: Trends Report 2020: Trends in critical load and critical level exceedances in the UK - Defra, UK](#)

of road traffic emissions to air quality capable of affecting European Sites. [Natural England's approach to advising competent authorities on the assessment of road traffic emissions under the Habitats Regulations - NEA001.](#)

- 4.5 Natural England welcome that the Scoping Report scopes in all impacts due to air quality into the ES, and an assessment of dust, road traffic emissions and potential impacts from any combustion plants will be included within the assessment on ecological receptors, including internationally and nationally designated sites.
- 4.6 We would expect any screening assessment to consider the most sensitive habitat type for each designated site as part of an initial assessment, and the applicant should refer to APIS for designated sites relevant critical levels and loads.
- 4.7 Information on air pollution modelling, screening and assessment can be found on the following websites:
 - SCAIL Combustion and SCAIL Agriculture - <http://www.scaill.ceh.ac.uk/>
 - Environment Agency Screening Tool for industrial emissions - <https://www.gov.uk/guidance/air-emissions-risk-assessment-for-your-environmental-permit>
 - Defra Local Air Quality Management Area Tool (Industrial Emission Screening Tool) England - <http://www.airqualityengland.co.uk/laqm>

5. Chapter 9 – Landscape and Visual Impact

Landscape and visual impact assessment

- 5.1 The environmental assessment should refer to the relevant [National Character Areas](#). Character area profiles set out descriptions of each landscape area and statements of environmental opportunity.
- 5.2 The EIA should include a full assessment of the potential impacts of the development on local landscape character using [landscape assessment methodologies](#). We encourage the use of Landscape Character Assessment (LCA), based on the good practice guidelines produced jointly by the Landscape Institute (LI) and Institute of Environmental Management and Assessment (IEMA) in 2013. LCA provides a sound basis for guiding, informing, and understanding the ability of any location to accommodate change and to make positive proposals for conserving, enhancing or regenerating character.
- 5.3 A landscape and visual impact assessment should also be carried out for the proposed development and surrounding area. Natural England recommends use of the methodology set out in Guidelines for Landscape and Visual Impact Assessment 2013 (3rd edition) produced by LI and IEMA. For National Parks and AONBs, we advise that the assessment also includes effects on the 'special qualities' of the designated landscape, as set out in the statutory management plan for the area. These identify the particular landscape and related characteristics which underpin the natural beauty of the area and its designation status.
- 5.4 The assessment should also include the cumulative effect of the development with other relevant existing or proposed developments in the area. This should include an assessment of the impacts of other proposals currently at scoping stage.

- 5.5 To ensure high quality development that responds to and enhances local landscape character and distinctiveness, the siting and design of the proposed development should reflect local characteristics and, wherever possible, use local materials. Account should be taken of local design policies, design codes and guides as well as guidance in the [National Design Guide](#) and [National Model Design Code](#). The ES should set out the measures to be taken to ensure the development will deliver high standards of design and green infrastructure. It should also set out detail of layout alternatives, where appropriate, with a justification of the selected option in terms of landscape impact and benefit.
- 5.6 The National Infrastructure Commission has also produced [Design Principles for National Infrastructure - NIC](#) endorsed by Government in the National Infrastructure Strategy.

6. Chapter 10 - Ecology and Biodiversity

Biodiversity and geodiversity

- 6.1 The assessment will need to include potential impacts of the proposal upon sites and features of nature conservation interest as well as opportunities for nature recovery through biodiversity net gain (BNG).
- 6.2 Ecological Impact Assessment (EclA) is the process of identifying, quantifying, and evaluating the potential impacts of defined actions on ecosystems or their components. EclA may be carried out as part of the EIA process or to support other forms of environmental assessment or appraisal. [Guidelines](#) and an [EclA checklist](#) have been developed by the Chartered Institute of Ecology and Environmental Management (CIEEM).
- 6.3 The [National Networks National Policy Statement](#) sets out a list of environmental principles that should be applied to the project to support environmental protection and enhancement. Applicants should look for opportunities to design infrastructure with a holistic approach to avoiding, or, where adverse impacts are unavoidable, mitigating and as a last resort compensating impacts on the natural, historic or built environment, on landscapes and on people by using nature-based solutions.

Designated nature conservation sites

Internationally designated sites

- 6.4 The development site is within or may impact on the following internationally designated nature conservation sites:
- Manchester Mosses SAC
 - Rixton Clay Pits SAC
- 6.5 European site conservation objectives are available at <http://publications.naturalengland.org.uk/category/6490068894089216>.
- 6.6 The ES should thoroughly assess the potential for the proposal to affect the above internationally designated sites of nature conservation importance.

- 6.7 Natural England note that Table 5.1 in Chapter 5 scopes out further assessment on Manchester Mosses SAC and Rixton Clay Pits SAC, and the justification for scoping our further assessment is expanded on within Table 10.2 in Chapter 10 stating that *'potential impacts to the qualifying features of this designation are considered unlikely due to distance and lack of potential impact pathways'*, and that this is confirmed by the HRA Stage 1 Screening Report.
- 6.8 Natural England do not concur with these conclusions. The proposal has the potential to impact these sites via air quality due to increased road vehicle exhaust emissions and emissions from the proposed Combined Heat and Power (CHP) Units. The HRA Screening has not been provided to Natural England, and at this stage there is not enough evidence within the Scoping Report to scope out impacts.
- 6.9 These conclusions also seem to contradict the statement made in section 7.41 in Chapter 7 which states that Manchester Mosses SAC may be affected by off-site emissions. Whilst we acknowledge that other impact pathways will be assessed within other Chapters of the ES, as the impacts also relate to biodiversity, they should also be covered within Chapter 5, to ensure there is consistency across all of the documentation for the Development Consent Order.

Nationally designated sites

- 6.10 The proposal is adjacent to the following Site of Special Scientific Interest (SSSI):
- Highfield Moss SSSI
- 6.11 Sites of Special Scientific Interest are protected under the Wildlife and Countryside Act 1981 (as amended). Further information on the SSSI and its special interest features can be found at www.magic.gov.uk.
- 6.12 Natural England's SSSI Impact Risk Zones can be used to help identify the potential for the development to impact on a SSSI. The dataset and user guidance can be accessed from the [Natural England Open Data Geoportal](#).
- 6.13 The ES should include a full assessment of the direct and indirect effects of the development on the features of special interest within the SSSI and identify appropriate mitigation measures to avoid, minimise or reduce any adverse significant effects.
- 6.14 Natural England welcome that impacts on Highfield Moss SSSI have been identified within the Scoping Report, and it has been scoped in for further assessment due to the disturbance of/degradation to habitats and associated species.
- 6.15 We further welcome that impacts on Highfield Moss SSSI are considered within all relevant Chapters across the Scoping Report including Chapter 7 – Air Quality and Chapter 13 – Hydrology. Natural England will provide advice on the impacts on the project to Highfield Moss SSSI through our DAS arrangement.
- 6.16 Natural England further note the scoping report includes some proposed measures to mitigate against impacts on Highfield Moss SSSI. Natural England's advice that any proposed mitigation measures should be informed by a robust assessment. As a detailed assessment of impacts on Highfield Moss SSSI as not yet been undertaken, we cannot provide advice on the effectiveness of any proposed mitigation measures at this stage.

Habitat Regulations Assessment

- 6.17 From the information provided, Natural England is uncertain if a HRA Screening has been undertaken for this project. Tables 5.1 and 10.2 refer to the HRA Screening as if one has already been undertaken, however sections 10.39 and 10.40 state a 'screening report will be completed as part of the HRA process'. We advise clarification on this is required, as if a HRA Screening has yet to be completed, it then cannot be used as justification to scope out impacts on Manchester Mosses SAC and Rixton Clay Pits SAC within the Scoping Report.
- 6.18 Natural England advise if the HRA Screening concludes non-likely significant effects on Manchester Mosses SAC and Rixton Clay Pits SAC alone, it should also include an in-combination assessment. The in-combination assessment must also consider any in-combination effects with other plans and projects. This could include plans or projects from neighbouring Local Planning Authorities Plans or projects comprise the following;
- a. The incomplete or non-implemented parts of plans or projects that have already commenced;
 - b. Plans or projects given consent or given effect but not yet started;
 - c. Plans or projects currently subject to an application for consent or proposed to be given effect;
 - d. Projects that are the subject of an outstanding appeal;
 - e. Ongoing plans or projects that are the subject of regular review;
 - f. Any draft plans being prepared by any public body;
 - g. Any proposed plans or projects published for consultation prior to the application.
- 6.19 If the assessment shows the project will have a likely significant effect, either alone or in combination then Article 6 (3) of the Habitats Directive requires an appropriate assessment to be undertaken.
- 6.20 Evidence Plans are a useful mechanism NSIP applicants can use to agree what information should be provided to the Planning Inspectorate and Natural England when undertaking Habitats Regulations Assessment (HRA). Agreeing the evidence-needs of the project early prior to applying for Development Consent will help reduce delays in the process. More information on Evidence Plans is available [here](#).

Regionally and Locally Important Sites

- 6.21 From the information provided within the Scoping Report, we are not aware if the applicant has considered regionally and locally important sites through our current engagement. Whilst we note that Section 10.42 identifies a range of Sites of Biological Interest (SBI) and Local Wildlife Sites (LWS) within 2km of the DCO site, no further information or assessment is provided. Table 10.2 then scopes out impacts on all other non-statutory sites during the operation phase. We also note that the justification for scoping out impacts on all other non-statutory sites during the operation phase, is the same justification represented in the construction phase, where they are scoped in.
- 6.22 We would welcome the Inspectorate reminding the applicant that the ES should consider any impacts upon local wildlife and geological sites, including local nature reserves. Local sites are identified by the local Wildlife Trust, geoconservation group or other local group. The ES should set out proposals for mitigation of any impacts

and if appropriate, compensation measures and opportunities for enhancement and improving connectivity with wider ecological networks. They may also provide opportunities for delivering beneficial environmental outcomes.

Protected species

- 6.23 The conservation of species protected under the Wildlife and Countryside Act 1981 and the Conservation of Habitats and Species Regulations 2017 is explained in Part IV and Annex A of Government Circular 06/2005 [Biodiversity and Geological Conservation: Statutory Obligations and their Impact within the Planning System](#).
- 6.24 Applicants should check to see if a mitigation licence is required using Natural England guidance on licensing [Natural England wildlife licences](#). Applicants can also make use of Natural England's charged service [Pre Submission Screening Service](#) for a review of a draft wildlife licence application. Natural England then reviews a full draft licence application to issue a Letter of No Impediment (LONI) which explains that based on the information reviewed to date, that it sees no impediment to a licence being granted in the future should the DCO be issued. This is done to give the Planning Inspectorate confidence to make a recommendation to the relevant Secretary of State in granting a DCO. See [Advice Note Eleven, Annex C – Natural England and the Planning Inspectorate | National Infrastructure Planning](#) for details of the LONI process.
- 6.25 Natural England welcome the Scoping Report considers impacts on projected species, and considers the impact of all phases of the proposal on protected species.
- 6.26 Natural England does not hold comprehensive information regarding the locations of species protected by law. Records of protected species should be obtained from appropriate local biological record centres, nature conservation organisations and local groups. Consideration should be given to the wider context of the site, for example in terms of habitat linkages and protected species populations in the wider area.
- 6.27 The area likely to be affected by the development should be thoroughly surveyed by competent ecologists at appropriate times of year for relevant species and the survey results, impact assessments and appropriate accompanying mitigation strategies included as part of the ES. Surveys should always be carried out in optimal survey time periods and to current guidance by suitably qualified and, where necessary, licensed, consultants.
- 6.28 Natural England has adopted [standing advice](#) for protected species, which includes guidance on survey and mitigation measures. A separate protected species licence from Natural England or Defra may also be required.

Priority Habitats and Species

- 6.29 Priority Habitats and Species are of particular importance for nature conservation and included in the England Biodiversity List published under section 41 of the Natural Environment and Rural Communities Act 2006. Most priority habitats will be mapped either as Sites of Special Scientific Interest, on the Magic website or as Local Wildlife Sites. Lists of priority habitats and species can be found [here](#). Natural England does not routinely hold species data. Such data should be collected when impacts on priority habitats or species are considered likely.
- 6.30 Consideration should also be given to the potential environmental value of brownfield

sites, often found in urban areas and former industrial land. Sites can be checked against the (draft) national Open Mosaic Habitat (OMH) inventory published by Natural England and freely available to [download](#). Further information is also available [here](#).

- 6.31 An appropriate level habitat survey should be carried out on the site, to identify any important habitats present. In addition, ornithological, botanical, and invertebrate surveys should be carried out at appropriate times in the year, to establish whether any scarce or priority species are present.
- 6.32 The ES should include details of:
- Any historical data for the site affected by the proposal (e.g. from previous surveys)
 - Additional surveys carried out as part of this proposal
 - The habitats and species present
 - The status of these habitats and species (e.g. whether priority species or habitat)
 - The direct and indirect effects of the development upon those habitats and species
 - Full details of any mitigation or compensation measures
 - Opportunities for biodiversity net gain or other environmental enhancement
- 6.33 Natural England note there is no mention of Priority Habitats and Species within the scoping report. If the project will not impact any Priority Habitats and Species then the ES should state this for certainty.

Ancient Woodland, ancient and veteran trees

- 6.34 The ES should assess the impacts of the proposal on the ancient woodland and any ancient and veteran trees, and the scope to avoid and mitigate for adverse impacts. It should also consider opportunities for enhancement.
- 6.35 Ancient woodland is an irreplaceable habitat of great importance for its wildlife, its history, and the contribution it makes to our diverse landscapes. Paragraph 186 of the National Planning Policy Framework (NPPF) sets out the highest level of protection for irreplaceable habitats and development should be refused unless there are wholly exceptional reasons, and a suitable compensation strategy exists.
- 6.36 Natural England maintains the [Ancient Woodland Inventory](#) which can help identify ancient woodland. The [wood pasture and parkland inventory](#) sets out information on wood pasture and parkland. The [ancient tree inventory](#) provides information on the location of ancient and veteran trees.
- 6.37 Natural England and the Forestry Commission have prepared [standing advice](#) on ancient woodland, ancient and veteran trees.
- 6.38 Natural England note there is no mention of Ancient Woodland, ancient and veteran trees within the scoping report. If the project will not impact any Ancient Woodland, ancient and veteran trees then the ES should state this for certainty.

Biodiversity net gain

- 6.39 The Environment Act 2021 includes NSIPs in the requirement for BNG, with the biodiversity gain objective for NSIPs defined as at least a 10% increase in the pre-development biodiversity value of the on-site habitat. It is the intention that BNG

- should apply to all terrestrial NSIPs accepted for examination from November 2025.
- 6.40 Natural England strongly welcome that in section 10.48 that the applicant will access the proposal using Defra's Statutory Biodiversity Metric to demonstrate compliance with existing policy and commit to a 10% net gain.
- 6.41 We encourage developers to develop their BNG proposals in adherence with well-established BNG principles including [BS 8683:2021 Process for designing and implementing Biodiversity Net Gain](#) and CIEEM/IEMA/CIRIA good practice principles ([2016](#)) and guidance ([2019](#)).
- 6.42 Biodiversity gains should ideally be secured for a minimum of 30 years and be subject to adaptive management and monitoring. BNG plans should be secured by a suitably worded requirement in the DCO.
- 6.43 We would welcome the opportunity to explore the best way to achieve BNG for this project with the applicant under our DAS arrangement.

7. Chapter 13 – Hydrology

Water quality

- 7.1 NSIPs can occur in areas where strategic solutions are being determined for water pollution issues and they may not have been factored into the local planning system as they are delivered through National Policy Statements.
- 7.2 The planning system plays a key role in determining the location of developments which may give rise to water pollution, and hence planning decisions can have a significant impact on water quality, and land. The assessment should take account of the risks of water pollution and how these can be managed or reduced. A number of water dependent protected nature conservation sites have been identified as failing condition due to elevated nutrient levels and nutrient neutrality is consequently required to enable development to proceed without causing further damage to these sites. The ES needs to take account of any strategic solutions for nutrient neutrality or Diffuse Water Pollution Plans, which may be being developed or implemented to mitigate and address the impacts of elevated nutrient levels.

8. Chapter 14 – Geology, Soils and Contaminated Land

Soils and agricultural land quality

- 8.1 Soils are a valuable, finite natural resource and should also be considered for the ecosystem services they provide, including for food production, water storage and flood mitigation, as a carbon store, reservoir of biodiversity and buffer against pollution. It is therefore important that the soil resources are protected and sustainably managed. Impacts from the development on soils and best and most versatile (BMV) agricultural land should be considered. Further guidance is set out in the Natural England [Guide to assessing development proposals on agricultural land](#).
- 8.2 Natural England note that no information regarding the impacts of the project on soils and BMV land is included within the Scoping Report. Table 5.1 in Chapter 5 scopes out impact on or loss of Soils and Geology as a resource. Natural England do not concur that impacts on soils can be scoped out of the assessment.

- 8.3 Based on the information provided it appears that the proposal will result in the loss of agricultural land. According to the provisional Agricultural Land Classification (ALC), the ALC within the proposal boundary is Grade 3, meaning it may be classified as BMV according to the ALC System (Grades 1, 2 and 3a land in the Agricultural Land Classification (ALC) system).
- 8.4 Natural England would like to draw the Inspectorates attention to Paragraph 180(a), 180(b) and 181 footnote 62 of the [National Planning Policy Framework](#) (NPPF), and advise all development involving the loss of >20 ha Best and Most Versatile land (grades 1, 2 or 3a in the Agricultural Land Classification) are not in accordance with the Town and Country Planning Development Management Procedure Order 2015.
- 8.5 We advise the following issues should be considered and, where appropriate, included as part of the ES:
- The degree to which soils would be disturbed or damaged as part of the development.
 - The extent to which agricultural land would be disturbed or lost as part of this development, including whether any BMV agricultural land would be impacted.
- 8.6 This may require a detailed Agricultural Land Classification (ALC) survey if one is not already available. For information on the availability of existing ALC information see www.magic.gov.uk:
- Where an ALC and soil survey of the land is required, this should normally be at a detailed level, e.g. one auger boring per hectare, (or more detailed for a small site) supported by pits dug in each main soil type to confirm the physical characteristics of the full depth of the soil resource, i.e. 1.2 metres. The survey data can inform suitable soil handling methods and appropriate reuse of the soil resource where required (e.g. agricultural reinstatement, habitat creation, landscaping, allotments and public open space).
 - The ES should set out details of how any adverse impacts on BMV agricultural land can be minimised through site design/masterplan.
 - The ES should set out details of how any adverse impacts on soils can be avoided or minimised and demonstrate how soils will be sustainably used and managed, including consideration in site design and master planning, and areas for green infrastructure or biodiversity net gain. The aim will be to minimise soil handling and maximise the sustainable use and management of the available soil to achieve successful after-uses and minimise off-site impacts.
- 8.7 Further information is available in the [Defra Construction Code of Practice for the Sustainable Use of Soil on Development Sites](#) and The British Society of Soil Science Guidance Note [Benefitting from Soil Management in Development and Construction](#).

9. Chapter 16 – Energy and climate change

Climate change

- 9.1 As the government’s adviser on the natural environment, climate change is central to Natural England’s work. Climate change is a profound threat to nature and people. The natural environment is experiencing the impacts of climate change and needs to recover, adapt to change and build resilience. Sustainable development can and should contribute to net zero through supporting nature recovery and climate change mitigation and adaptation, helping both nature and people adapt, through Nature-based Solutions.
- 9.2 Part 2 of EN-1 covers the government’s energy and climate change strategy, including policies for mitigating climate change. Section 4.10 sets out generic considerations that applicants and the Secretary of State should take into account to help ensure that energy infrastructure is safe and resilient to climate change. This section further advises that the resilience of the project to climate change should be assessed in the Environmental Statement (ES) accompanying an application. Including:
- In preparing measures to support climate change adaptation applicants should take reasonable steps to maximise the use of Nature-based Solutions alongside other conventional techniques (4.10.5).
 - In addition to avoiding further GHG emissions when compared with more traditional adaptation approaches, Nature-based Solutions can also result in biodiversity benefits and net gain, as well as increasing absorption of carbon dioxide from the atmosphere (4.10.7).
 - Applicants should look for opportunities within the proposed development to embed nature based or technological solutions to mitigate or offset the emissions of construction and decommissioning (5.3.6).
 - Steps taken to minimise and offset emissions should be set out in a GHG Reduction Strategy, secured under the Development Consent Order. The GHG Reduction Strategy should consider the creation and preservation of carbon stores and sinks including through woodland creation, hedgerow creation and restoration, peatland restoration and through other natural habitats (5.3.7).
 - The design process should embed opportunities for nature inclusive design (5.4.21).
 - Applicants should consider any reasonable opportunities to maximise the restoration, creation, and enhancement of wider biodiversity, and the protection and restoration of the ability of habitats to store or sequester carbon (5.4.33).
 - In addition to delivering biodiversity net gain, developments may also deliver wider environmental gains and benefits to communities relevant to the local area, and to national policy priorities, such as reductions in GHG emissions; reduced flood risk; improvements to air or water quality; climate adaptation; landscape enhancement; increased access to natural greenspace, or the enhancement, expansion or provision of trees and woodlands. The scope of potential gains will be dependent on the type, scale, and location of specific projects. Applicants should look for a holistic approach to delivering wider environmental gains and

benefits through the use of Nature-based Solutions and Green Infrastructure
(4.6.13)

10. Other advice

Connecting people with nature

- 10.1 The ES should consider potential impacts on access land, common land, public rights of way, in line with NPPF paragraph 104 and there will be reference in the relevant National Policy Statement. It should assess the scope to mitigate for any adverse impacts. Rights of Way Improvement Plans (ROWIP) can be used to identify public rights of way within or adjacent to the proposed site that should be maintained or enhanced.
- 10.2 Measures to help people to better access the countryside for quiet enjoyment and opportunities to connect with nature should be considered. Such measures could include reinstating existing footpaths or the creation of new footpaths, cycleways, and bridleways. Links to other green networks and, where appropriate, urban fringe areas should also be explored to help promote the creation of wider green infrastructure. Access to nature within the development site should also be considered, including the role that natural links have in connecting habitats and providing potential pathways for movements of species.
- 10.3 Relevant aspects of local authority green infrastructure strategies should be incorporated where appropriate.



Proposed DCO Application by Tritax Symmetry SRFI North Limited for Rail Freight Interchanges.

Royal Mail response to EIA Scoping Consultation

Under section 35 of the Postal Services Act 2011, Royal Mail has been designated by Ofcom as a provider of the Universal Postal Service. Royal Mail is the only such provider in the United Kingdom. The Act provides that Ofcom's primary regulatory duty is to secure the provision of the Universal Postal Service. Ofcom discharges this duty by imposing regulatory conditions on Royal Mail, requiring it to provide the Universal Postal Service.

Royal Mail's performance of the Universal Service Provider obligations is in the public interest and should not be affected detrimentally by any statutorily authorised project. Accordingly, Royal Mail seeks to take all reasonable steps to protect its assets and operational interests from any potentially adverse impacts of proposed development.

Royal Mail and its advisor BNP Paribas Real Estate have reviewed the EIA Scoping Report dated 5th November 2024. There are nine operational Royal Mail properties within 10km of the proposed scheme.

The construction of this infrastructure proposal has been identified as having potential to impact on Royal Mail operational interests, particularly if combined with cumulative impacts from other major development schemes. However, at this time Royal Mail is not able to provide a consultation response due to insufficient information being available to adequately assess the level of risk to its operation and the available mitigations for any risk. Consequently, Royal Mail wishes to reserve its position to submit a consultation response/s at a later stage in the consenting process and to give evidence at any future Public Examination, if required.

In the meantime, any further consultation information on this infrastructure proposal and any questions of Royal Mail should be sent to:

Holly Trotman ([REDACTED]@royalmail.com), Senior Planning Lawyer, Royal Mail Group Limited

Grace Russell ([REDACTED]@struttandparker.com) BNP Paribas Real Estate/Strutt & Parker

Please can you confirm receipt of this holding statement by Royal Mail.

End

Planning – Development Management Place

Salford City Council
Salford Civic Centre, Chorley Road
Swinton, M27 5AW

The Planning Inspectorate

Email

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Web

www.salford.gov.uk

Our Reference

OTH/2024/1800

Your Reference

TR051001

BY EMAIL ONLY –

3 December 2024

Dear Sir / Madam,

Application by Intermodal Logistics Park North Limited (the Applicant) for an Order granting Development Consent for the Intermodal Logistics Park North (the Proposed Development): scoping consultation

1 of 3

Further to your letter dated 5 November 2024 inviting the comments of Salford City Council as a consultation body in relation to the scoping consultation regarding the proposal by Intermodal Logistics Park North Limited for the Intermodal Logistics Park North Strategic Rail Freight Interchange, I have set out our comments below.

Having reviewed the submitted scoping report (EIA Scoping Report – Intermodal Logistics Park North, dated November 2024), we note that the proposed strategic rail freight interchange (SRFI) and associated development would be on land to the east of Newton-le-Willows, within the administrative boundaries of St Helens Borough Council and Wigan Council, and adjacent to the administrative boundary of Warrington Borough Council.

Our comments on the scoping report as set out below relate primarily to the assessment of reasonable alternatives, and the transport chapter of the report.

Assessment of reasonable alternatives

As noted at paragraph 4.35 of the scoping report, the EIA regulations require that the scope of an environmental statement must include “a description of the reasonable alternatives studied by the developer, which are relevant to the proposed development and its specific characteristics, and an indication of the main reasons for the option chosen, taking into account the effects of the development on the environment.” Schedule 4 of the regulations confirms that this assessment of reasonable alternatives may for example relate to development design, technology, location, size and scale.

It is noted at paragraph 4.36 of the scoping report that it is intended that “the consideration of alternatives will be set out in a specific ES Chapter, drawing from the iterative design, assessment and mitigation process as described above. A key aspect of this is anticipated to be the consideration

of the site layout, optimising the design based on the DCO Site's environmental constraints, topography and sensitivities in the area around the DCO Site.”

We consider that the assessment of reasonable alternatives also needs to consider alternative sites within the region which could accommodate a strategic rail freight interchange facility. In this context, the assessment should include within its scope Port Salford which is allocated within Salford's adopted Local Plan (Salford Local Plan: Development Management Policies and Designations, adopted 18 January 2023) as a tri-modal freight terminal and employment area, and via the recently adopted Places for Everyone Joint Development Plan Document for Bolton, Bury, Manchester, Oldham, Rochdale, Salford, Tameside, Trafford and Wigan (adopted 21 March 2024).

Port Salford comprises two sites which lie to the north and south of the A57 in Irlam, Salford. To the south of the A57 planning permissions are in place to deliver a multi-modal freight interchange including rail, road and water connections along with logistics warehousing (original planning permission reference 03/47344/EIAHYB with various subsequent amendments through additional consents). Port Salford therefore has the potential to utilise the Manchester Ship Canal as an additional sustainable transport option in addition to the rail connections that are to be provided at both Port Salford and in relation to the proposed development at Parkside.

To date one warehouse unit (c.26,000sqm – planning permission reference 14/65735/REM) has been constructed at Port Salford and is occupied by Culina. Existing consents allow for a further c.117,000sqm of warehouse space to the south of the A57 across three warehouse units (planning permission references 17/70437/REM and 17/70438/REM and associated amendments). To the north of the A57 is former Green Belt land that has been allocated through the Places for Everyone Joint Development Plan Document (Policy JP Allocation 26: Port Salford Expansion) to deliver an expansion to the consented Port Salford site. This expansion site is identified for a further c.320,000sqm of employment floorspace with a strong focus on logistics but also potential for high quality manufacturing space.

There is therefore a strong adopted policy framework protecting the opportunity to deliver Port Salford as a whole, including Salford Local Plan Development Management and Designations Document Policy EC2 (Port Salford) and the Places for Everyone Joint Development Plan Document Policies JP-Strat 1 (Core Growth Area), JP-Strat 4 (Port Salford) and JP Allocation 26 (Port Salford Expansion).

2 of 3

Given its status as a development plan allocation with the benefit of planning permissions, Port Salford should be identified and assessed a reasonable alternative within the Environmental Statement and any potential impacts on its delivery arising from the proposed development, including available capacity on rail and highway infrastructure, should be fully understood and considered as part of this.

Transport

The scoping report confirms that the development proposal site is well located for logistics operators to serve both the Liverpool City Region and the Greater Manchester conurbation, which are within the approximately 20 miles radius which terminal operators consider to be optimal (paragraph 2.39). The report identifies that having warehousing on site means that the cartage costs between the terminal and the warehousing operation is considerably reduced and permits later cut-off times

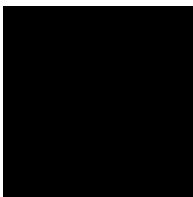
Based on the extent of the traffic surveys as set out within the transport chapter of the scoping report, it appears that the applicant team does not expect the development to have an impact on Salford's highway network. Paragraph 6.121 does state that “the extent / scope of assessment will be informed by the PLRHM (Parkside Link Road Highway Model), which will inform where and what changes in traffic levels are expected to occur.” The PLRHM does not include junctions within Salford in its current scope, but should the assessment indicate that junctions at the boundary closest to Salford would incur large increases in trips, we consider that there would be a strong case to extend the study area to include junctions within Salford. The roads of primary concern to Salford City Council in this context are the A580 and the M62 in the first instance, and both are confirmed to be included in the scope of the PLRHM.

We note that there is no indication in the scoping report of what the trip generation of the site is projected to be and / or the distribution of those trips. It is therefore difficult at this stage to confirm whether we consider the extent to be acceptable or otherwise.

The scoping report states at paragraph 6.106 that “at this stage the full approach and methodology of assessment is still to be developed and agreed with the respective LPA / LHAs (and associated advisors) plus National Highways...” It goes on to state at paragraph 6.107 that “operational modelling of (to be identified) individual junctions will also be required to support detailed discussions with the LPA / LHAs ...” Whilst it is likely assumed that none of these will be within Salford, this will not be known until the assessment has been carried out with paragraph 6.109 stating that “a comprehensive study will be undertaken in order to understand and mitigate the impact of the development upon the local highway network.”

We look forward to being formally consulted at the pre-application stage in due course.

Yours sincerely,



Martin Hodgson
Associate Director – Planning and Building Control

From: [REDACTED]
To: [Intermodal Logistics Park North](#)
Cc: [REDACTED]
Subject: SGN response: TR051001
Date: 08 November 2024 14:27:05
Attachments: [image001.jpg](#)
[image002.png](#)

You don't often get email from [REDACTED]@sgn.co.uk. [Learn why this is important](#)

Classified as Internal

Hello,

SGN received the application by Intermodal Logistics Park North Limited (the Applicant) for an Order granting Development Consent for the Intermodal Logistics Park North (the Proposed Development).

We have reviewed the document and can confirm we do not have any comments.

Kind Regards,

Katie Patullo (BSc Hons)
Environment Manager, Southern Network

E: [REDACTED]@sgn.co.uk

M: [REDACTED]

SGN, St Lawrence House, Station Approach, Horley, Surrey, RH6 9HJ

[REDACTED]



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Scotland Gas Networks plc (company registration number SC264065) is registered in Scotland and has its registered office address at Axis House, 5 Lonehead Drive, Newbridge, Edinburgh EH28 8TG

From: Planningsouth <planningsouth@spenergynetworks.co.uk>
Sent: 03 December 2024 18:19
To: Intermodal Logistics Park North; Planningsouth
Cc: Edwards, Steven
Subject: RE: TR0510001 - EIA Scoping Notification and Consultation

Thank you for the below consultation.

Please note this site is outside of the SP Manweb licenced area and as such I have no comments.

Have you consulted Electricity North West as the site in their licence area. Please let me know and I can forward to a contact id needed.

Regards
Steve

Internal Use

From: Intermodal Logistics Park North <ilpnorth@planninginspectorate.gov.uk>
Sent: Tuesday, November 5, 2024 9:42 AM
To: Planningsouth <planningsouth@spenergynetworks.co.uk>
Cc: Edwards, Steven <[REDACTED]@spenergynetworks.co.uk>
Subject: TR0510001 - EIA Scoping Notification and Consultation

EXTERNAL SENDER: Be cautious, especially with links and attachments. Report phishing if suspicious.

Dear Sir / Madam

Please see attached correspondence on the proposed Intermodal Logistics Park North.

The Applicant for the Proposed Development intends to make an application for Development Consent under the Planning Act 2008. The Applicant has sought a Scoping Opinion from the Planning Inspectorate, on behalf of the Secretary of State, as to the scope and level of detail of the information to be provided within the Environmental Statement that will accompany its future application.

The Planning Inspectorate has identified you as a consultation body to inform the Scoping Opinion and is therefore inviting you to submit comments by **3 December 2024**. The deadline is a statutory requirement that cannot be extended.

Further information is included within the attached letter.

Many thanks,

Todd Brumwell



The Planning Inspectorate
Environmental Services
Central Operations
Temple Quay House
2 The Square
Bristol, BS1 6PN

Issued via email

Contact: Stephen Gill

Tel: [REDACTED]

[REDACTED] [@sthelens.gov.uk](mailto:[REDACTED]@sthelens.gov.uk)

2nd December 2024

Dear Sir/Madam,

PLANNING ACT 2008 (AS AMENDED) AND THE INFRASTRUCTURE PLANNING (ENVIRONMENTAL IMPACT ASSESSMENT) REGULATIONS 2017 (THE EIA REGULATIONS) – REGULATIONS 10 AND 11.

APPLICATION BY INTERMODAL LOGISTICS PARK NORTH LIMITED FOR AN ORDER GRANTING DEVELOPMENT CONSENT FOR THE INTERMODAL LOGISTICS PARK NORTH

I refer to your request for an Environmental Impact Assessment Scoping Opinion (“Scoping Opinion”) for the above development. As required by Regulation 10(1) of the Infrastructure Planning (Environmental Impact Assessment) Regulations 2017 (as amended) the Scoping Report submitted by the applicant includes the following information:

- a. a plan sufficient to identify the land;
- b. a description of the proposed development, including its location and technical capacity;
- c. an explanation of the likely significant effects of the development on the environment; and
- d. such other information or representations as the person making the request may wish to provide or make.

Based on the information submitted, St Helens Borough Council as the Local Planning Authority (“LPA”) have sufficient information to formally respond to the Planning Inspectorate. This letter will provide observations on the submitted Scoping Report, which we hope you will find helpful when formulating your Scoping Opinion for the Environmental Impact Assessment (“EIA”) associated with the development.

Introduction & Proposed Development

The proposed development in this case is for a new Strategic Rail Freight Interchange (“SRFI”) and associated development comprising the following:

- Provision of a rail terminal serving up to 16 trains per day, including ancillary development such as container storage, cranes for the loading and unloading of shipping containers, Heavy Goods Vehicle (HGV) parking, rail control building and staff facilities.
- A rail turn-back facility within the Western Rail Chord (Parkside West).



- Up to 687,500 square metres (m²) (gross internal area) of warehousing and ancillary buildings with a total footprint of 555,000m² and up to 137,500m² of mezzanine floorspace, with the potential to be rail-connected, and rail served.
- Potential for new road/pedestrian bridges across the Chat Moss Line.
- New road infrastructure and works to existing road infrastructure.
- Provision of an overnight lorry park for users of the SRFI.
- A new energy centre and electricity substations.
- Provision of photovoltaics¹⁰ and battery storage on site.
- Strategic landscaping and open space, including alterations to public rights of way and the creation of new ecological enhancement areas.
- Demolition of existing on-site structures (including existing residential dwellings / farmsteads and commercial premises).
- Potential relocation of the Huskisson Memorial.
- Earthworks to regrade the site to provide appropriate access, connections to the railway, development plots and landscape zones.

The site itself is allocated in the St Helens Borough Local Plan up to 2037 (“Local Plan”) under site allocation reference 7EA. The requirements for the allocation are covered by a specific Local Plan Policy under LPA09 (an extract of the Policy contained below).

Policy LPA09: Parkside East

1. The Parkside East site (identified as Site 7EA in Policy LPA03) shall be considered suitable in principle for development of a Strategic Rail Freight Interchange (SRFI) with the primary purpose of facilitating the movement of freight by rail and its on-site storage and transfer between rail and other transport modes.
2. The site is also considered suitable in principle for other forms of B2 and B8 employment use provided that they would:
 - a) bring significant inward investment, local employment, and training benefits for the local community; and
 - b) (i) be rail served (i.e., requiring on-site access to a railway); or (ii) be of a layout and scale that would not prejudice the ability to develop an effectively laid out SRFI or other rail served employment development (including any necessary rail and road infrastructure, buildings, and landscaping), on at least 60ha of the site, at any time in the future.
3. Proposals for development within site 7EA will be required to:
 - a) satisfy the masterplanning requirements set out in Policy LPA03.1;
 - b) create safe and convenient access from Junction 22 of the M6 for Heavy Goods Vehicles and other vehicles;
 - c) mitigate any adverse impacts on the surrounding strategic and local road network;
 - d) comply with Policy LPC11 in relation to the protection of designated heritage assets;
 - e) achieve direct rail access to and from the Liverpool / Manchester ('Chat Moss') and the West Coast Main Lines (unless agreed otherwise by the Council);
 - f) be designed to minimise impacts on residential amenity;
 - g) establish and implement a Travel Plan that incorporates measures to encourage travel to / from the development using sustainable transport modes, including access by public transport, cycle and foot, in accordance with Policy LPA07;
 - h) make provision for the positive management of existing and new environmental assets;

- i) put training schemes in place (where practicable) to increase the opportunity for the local population to obtain access to employment at the site; and
 - j) ensure the timely delivery of the rail terminal infrastructure of the SRFI or other rail served employment development, in accordance with the comprehensive masterplan to be prepared for the whole site as required by Policy LPA03.1, section 2. Within this, details of the phasing for the whole site must include a clear and justified employment floorspace trigger for the delivery of the rail terminal infrastructure.
4. That part of site 7EA which falls to the west of the M6 is safeguarded from all forms of development unless it can be shown that such development within it will not prejudice, or may provide, effective and deliverable future siding facilities in connection with the development of an SRFI or other rail-enabled development within the part of the site which falls to the east of the M6 (see Policies Map).

In summary, Policy LPA09 concludes that the site is suitable in principle for a new SRFI. The site is also considered to be suitable in principle for B2 & B8 uses (alongside the SRFI) provided that the uses bring inward investment and local employment, are rail served and do not prejudice the delivery of the SRFI. Policy LPA09 also requires that the site is comprehensively master planned.



The size of the SRFI development means that it is classed as a Nationally Significant Infrastructure Project (“NSIP”), and the applicant will need to undertake the process of a Development Consent Order (“DCO”) to secure permission.

The site is split into two sections. This includes the ‘main site’, which would accommodate the bulk of the SRFI development, and is situated to the east of the M6, to the south of the Chat Moss Rail Line and to the west of Winwick Lane. The second parcel of land to be used for this development is situated within Parkside West and this would accommodate the rail reversing leg required for the SRFI; this land is situated to the west of the M6, which bisects the site, to the east of the West Coast Mainline.

Structure of EIA Scoping Request

In terms of the structure of the Scoping Request, this is set out in Chapter 1 at paragraphs 1.15 and 1.16, which is summarised as follows:

- Chapter 2 describes the site, the surrounding context, and identifies sensitive receptors;
- Chapter 3 provides a description of the development proposed;
- Chapter 4 sets out the approach to preparing the EIA and the proposed structure;
- Chapter 5 provides an overview of the proposed scope of the EIA;
- Chapter 6-19 provide a review of the relevant baseline, outline the potential environmental effects and the proposed scope of the assessment under individual topic headings;
- Chapter 20 considers the cumulative and inter-related effects; and
- Chapter 21 provides a conclusion.

The LPA does not have any comments on the structure and considers this to be a comprehensive approach.

The EIA Scope

As set out above, Chapter 5 of the Scoping Request provides a scope for the EIA in relation to the technical matters, which are as follows:

- Transport
- Air Quality
- Noise and Vibration
- Ecology & Biodiversity
- Landscape and Visual
- Built Heritage
- Archaeology
- Flood risk and Drainage
- Geology, Soils & Contaminated Land
- Materials & Waste
- Energy & Climate Change
- Socioeconomics
- Population & Human Health
- Major Accidents & Disasters
- Cumulative and in combination effects



Chapter 5 also provides an assessment of what has been 'scoped in' and 'scoped out' within each technical discipline, which will be discussed below.

General Observations

The following are some general observations on the Scoping Report that the applicant should review prior to finalising the EIA.

- B8 Definition (on page iv) is defined as storage and distribution uses (a classification of uses under the Town and Country Planning Order 1987).

LPA Comment: 'as amended' needs adding to the Town & Country Planning Order 1987

- Paragraph 2.2 under the first bullet point describes the 'main site' as being "*the triangular parcel of land located to the west of Parkside Road and to the north of the Chat Moss Line*" whereas paragraph 2.5 describes "*The triangular parcel of land located to the north of the Chat Moss Line and to the east of Parkside Road also forms part of the Main Site.*"

LPA Comment: This should be amended so that the description of the site is consistent.

- The second bullet point at paragraph 2.2 describes the Western Rail Chord as "*land to the west of the M6 motorway, which bisects the DCO Site in a northwest southeast orientation, and to the east of the West Coast Mainline.*"

LPA Comment: This should be reworded for greater clarity for example "*land to the west of the M6 motorway (which bisects the Main Site & Western Rail Chord) and to the east of the west coast main line.*"

- There is no abbreviation explanation for 'TBBD'

LPA comment: Can the abbreviation explanation be added.

- Paragraph 2.4 states that: *The majority of the Main Site is comprised of agricultural fields used for arable crops, with some small patches of woodland in the east. There are also a number of residential properties, farmsteads and a commercial yard within the main site. Parkside Road (A573) runs through the DCO Site to the south.*

LPA Comment: Parkside Road runs through the site from north to south of the DCO. Therefore, "*to the south*" should be removed from paragraph 2.4.

- Paragraph 2.17 states that *The Registered Battlefield of the Battle of Winwick (also known as Battle of Red Bank) 1648 is located directly adjacent to, and partially overlapping with, the western edge of the draft Order Limits.*

LPA comment: The Registered Battlefield is situated to the south of the Western Chord not the west.

- Paragraph 2.6 of the Scoping Report refers to the fact the Western Chord is comprised of



Safeguarded land to the rail-turn head. However, paragraph 3.5 acknowledges that the path/route of the rail reversing leg may differ from the area allocated as safeguarded for the reversing leg in the Local Plan.

LPA Comment: The route/path of the rail reversing leg within the Western Rail Chord is yet to be finalised (from our understanding). In the final EIA, we would ask that the applicant be clear on this point in that it is either finalised or that the route is a work in progress. The LPA would want to avoid inconsistent statements as this is likely to cause confusion to consultees and members of the public.

Response to Technical Disciplines

Chapter 6 - Transport

Chapter 6 of the Scoping Report considers transport matters. The Councils Highway Engineer (“Highway Engineer”) has reviewed the information, and has provided some formal comments, which are contained in full at Appendix I of this letter. The following matters have been ‘scoped in’ and ‘scoped out’ in relation to transport for both the construction and operational phases of development:

| Construction Effects | Scoped in or out? | Operation Effects | Scoped in or out? |
|--|-------------------|---|-------------------|
| Chapter 6: Transport | | | |
| Construction traffic travelling to and from the DCO Site | Scoped out | Anticipated levels of traffic (LGV and HGV’s) to be generated by the DCO Site | Scoped in |

The Highway Engineer does not object to the matter that is to be ‘scoped in’ to the EIA; however, there are concerns in relation to the matter that is being ‘scoped out’, which includes construction traffic travelling to and from the site. The Highway Engineer is of the view that this matter should be ‘scoped in’ to the EIA. The Highway Engineer considers that the potential environmental effects of construction need to be considered and how these will be mitigated. There are still local roads that would be required for construction traffic purposes even though the Parkside Link Road (“PLR”) will be open and operating by the time the site is brought forward.

The construction phases were considered as part of the Parkside Phase 1 and Parkside Link Road EIAs. The Highway Engineer considers that following (non-exhaustive issues) would need to be considered:

- Increase of traffic due to construction on sensitive roads such as the A49;
- Dust and dirt implications due to increases in construction traffic activity;
- Construction traffic travel to work e.g., workers travelling to site; and
- Any safety and severance related impacts due to construction activity.

In relation to the operational phase, the Highway Engineer has offered a detailed response that is summarised where possible below:



Transport Assessment

In relation to the Transport Assessment, the Scoping Report at paragraph 6.113 provides a list of what will be included in the document. The Highway Engineer states that the following additional points should also be included:

1. The Transport Strategy of the Transport Assessment should be aligned with the Liverpool SuperPort aims.
2. There should be a detailed description and plans of the overnight lorry park proposed to accommodate HGVs, particularly in relation to the parking provision, proposals for waste and access to welfare facilities for the drivers. Clarity should be given as to how early arrivals will be accommodated:
 - a. A HGV Management Plan would be required as part of the above, and the key technical aspects of that should follow the broad guide set in the 2024 St Helens Transport & Travel Supplementary Planning Document.
 - b. A HGV Routing Strategy is offered in the EIA Scoping Report, and this should ideally become part of the HGV Management Plan. Routing control in isolation is not enforceable and, therefore, needs to go hand-in-hand with wider signage, mitigation and operational controls.
3. Accessibility should be multi-modal and relate to the Minimum Accessibility Assessment requirements of the 2024 St Helens Transport & Travel Supplementary Planning Document.
4. Accessibility should be cognisant of two wider points, the St Helens and Liverpool City Region Combined Authority (LCRCA) Local Cycling & Walking Infrastructure Plans (“LCWIP”) and the LCRCA Bus Franchising proposals.
5. Inputs to the Transport Assessment will be heavily reliant on traffic and transportation modelling work, and the associated documentation (Validation Report, Uncertainty Log, Forecasting Report, Model Performance and Scoping Reports) should be referenced and/or appended accordingly.
6. The Policy sections of the Transport Assessment should also be clear as to how appropriate Guidance documents have been utilised and adhered to.
7. It would be advisable that committed development is given its own chapter within the Transport Assessment, with development phasing and build out rates being linked and reported as per the Uncertainty Log.

Reference is also made in the Scoping Report to the use of Manual for Streets within the Transport Assessment approach. The Highway Engineer has some hesitance with the use of Manual for Streets in this instance given the logistics nature of the development and the development location in question.

The Scoping Report provides details of the proposed Travel plan scope, which is set out at paragraph 6.115. The Highway Engineer states that reference should be made to the 2024 St Helens Transport & Travel Supplementary Planning Document for guidance on Travel Plan expectations. In addition, Local Plan Policy LPA09 is also clear that the site should establish and implement a Travel Plan that incorporates measures to encourage travel to / from the development using sustainable transport modes, including access by public transport, cycle and foot, in accordance with Local Plan Policy LPA07.

As part of the Transport Assessment, sustainable travel connections should be considered. Public Transport connections to St Helens town centre and/or other key destinations will also need to be considered, as will cross-boundary provision. Walk and cycle connectivity should always be afforded



the same level of consideration as vehicular connectivity. Safety, Security, Suitability, and the general ambience of those routes need to be considered and enhanced where applicable.

Traffic & Transport Modelling

It has been established that the Parkside Link Road Highway Model ("PLRHM") is the appropriate basis for modelling work, and the Highway Engineer does not object to this approach.

The site is expected to generate the following trip types:

- Rail Freight Terminal.
- HGV trips internal, external and employee visitor trips.
- Warehousing – LGV and HGV, internal and external trips, and employee / visitor trips.

The Highway Engineer has raised the following points that have been set out previously in a Technical Notes issued to the applicant as part of various discussions about the development prior to the issue of the Scoping Report. These points will be reiterated in this response as follows:

- The Parkside Capacity Study (Steer 2021, ref: 23978401) found there is a rail network capacity for pathing to further locations for both the Ribble junction towards Preston and the Winsford South Junction towards Crewe. However, there is concern about the path through Manchester to access lines across the Pennines that will need to be addressed in further analysis. How the availability of train paths (volume of trains, origins/destinations, lengths, types of goods) around Parkside relates to the comparator sites proposed will be a key piece of analysis.
- There should ideally be explicit detail on the expected /assumed number of trains per day. The previous proposal stated within the Parkside capacity assessment that there needs to be capacity for at least four trains per day, with the document also stating that the site will be capable of handling up to 20 trains per day. The number of trains per day will have a direct bearing on the road to rail, rail to road and the consequent road to road trip rates, and the equivalent information from the comparator sites needs to be understood to determine applicability for use in relation to Parkside.
- The National Policy Statement for National Networks 2015 states that where applicable an SRFI will need to be able to accommodate 775 metre trains. Clarification will be needed on the intended design of the rail sidings and the capacity of trains to be accommodated. 700m+ trains have a significant bearing on the on-site infrastructure and layout as well as the road to rail and rail to road trip generation and associated mode shares. Again, this will need to be considered in the context of the comparator sites proposed in the Hydrock Technical Note.
- The summary trip rates provided are split solely by Light and HGVs. Clarity will be needed on the differentiation between workforce and goods-based trips. The localised distribution of goods may generate light goods as well as heavy goods trips, on a range of classifications affecting PCU numbers, etc.
- The automation level of proposed B2/B8 units at the proposed site will also have a bearing on the Trip Generation potential. Although this represents a level of detail beyond what is understood and available at this time, it does have a significant bearing on the level of job



creation, type of workforce required, the distribution of trips associated with that workforce, as well as the turnover potential of the site at each unit/warehouse.

- The future rail path availability and capacity is heavily influenced by proposed upgrades, routing changes, origin-destination pairings, and capacity increases of the rail network. Northern Powerhouse Rail currently has various options but is primarily a mixture of newly built high-speed line and upgrades to the existing lines. Although a fixed assessment will be required, it may vary dependent upon opening and forecast year assessments and what rail infrastructure could be classed as committed for each.
- It is noted and understood that warehouses operate differently depending upon rail served or linked functionality. This principle will be inherent to the masterplan of the site and needs to be part of the comparative process against the other sites used to generate the proposed Trip Rates.
- An SRFI is a 24-hour operation, and peak hours of operation will not necessarily align with peak highway network hours. 0800-0900, 1700-1800 and 24-hour trip rates are presented currently. As a minimum, a breakdown by hour will be required, per vehicle type. Ultimately, if rail to road is a dominant factor in highway trip generation, then there may be working practices that can mitigate highway impacts, and these need to be part of the thinking.
- Linkages with other Parkside B2/B8 units, either Parkside East or West, need to be understood. It needs to be further considered what bearing the SRFI (rail served or rail linked) will have on the non-rail linked/served elements of the wider Parkside East and West site.

It is understood that comparator sites could be used to derive Trip Generation for the development. This could be an acceptable approach subject to the following:

1. Consideration of the comparator sites in relation to the aforementioned points;
2. Clarity that the use of MEAN trip rates from comparator sites is a technique that has been used within the DCO process previously for this land use type; and
3. General applicability of the sites in relation to the Parkside geographic advantages (rail, motorway, major conurbations, train path availability, etc.).

Transport Impacts

In relation to transport impacts, the Highway Engineer suggests that all likely transport impacts are defined within an Appraisal Specification Report (“ASR”) or equivalent such as a Mode Performance Report, and definition of how they will be quantified provided. The impacts should then be documented in the Transport Assessment. Details of what this should include is set out in the Highway Engineers response in Appendix I.

The Scoping Report specifies some operational/management measures and off-site highway improvement approaches, which are appropriate (details set out in the Highway Engineers response at Appendix I). However, the Highway Engineer considers that an HGV Management Plan should also be included.



Matrix Development

The Highway Engineer concludes that the specified approach to updating the trip matrices should be provided within the Strategic Modelling Approach or in the upcoming Model Performance Report. If existing base year demand matrices are to be used then it is critical that the 'prior matrices' are obtained, not the matrices that have gone through matrix estimation:

- The existing Parkside Traffic Model uses initial prior trip matrices, for each of the time periods and vehicle user classes, extracted as cordon matrices from the Warrington Multi-Modal Transport Model (WMMTM).
- Consideration will need to be given to whether the LCRTM, WMMTM or the TPS RTM2 is the most appropriate tool for prior matrix cordon in this instance, or if another approach should be adopted.
- The Highway Engineer holds the view that the LCRTM provides an appropriate start point for prior matrix development although 'infilling' from other models or sources may be needed.

Rail and Demand Modelling

The need, or otherwise, for rail passenger modelling should be clarified at the earliest possible stage. Any specific reasons why this is not required should be agreed in early consultation. Alterations to the rail timetable may impact on passenger services so confirmation of how these impacts are to be minimal is recommended.

Similarly, it is understood that Variable Demand Modelling is not perceived as being required. The Highway Engineer suggests that the best approach is to understand from prior equivalent DCO processes, whether or not VDM has been regularly required. The scale/scope of prior schemes can be used to aid determination VDM applicability in this instance.

We further understand that a simple mode choice model will be developed to aid the 2nd step of the Four Stage Modelling approach (Mode Split). This is considered valid subject to the contents of any Utility approach and the supporting datasets. These would need to be documented accordingly.

Data Requirements - Manual Classified Counts

The Manual Classified Counts ("MCC") are defined within the Scoping Report. Core junctions are identified, and clarity will be needed on which counts will be used in model calibration and which will be saved for validation.

The Highway Engineer understands that surveys have already been undertaken in October 2024, and as such the following points are replicated from prior advice given by the Highway Engineer in relation to the proposals:

- Queue lengths are specified within the Data Collection Specification, which satisfies a previous query.
- In relation to temporal scope, the times of 0600-2000 are consistent with the Highway Engineers' expectations and will give an understanding of the network peak periods and peak hours.
- It is stated that the MCC counts will be completed in a single day. Identification of major traffic disruption will need to be considered to validate the use of the MCC counts. This may require specific counts requiring further survey. The Highway Engineer suggests that once the counts



have been completed a record of any abnormal traffic conditions are recorded and considered within the model development alongside the ATC data. It is noted that there is planned roadworks at the end of October (25-28th of October-exact timing to be confirmed) at M6 Junction 22 related to the Parkside Link Road construction. If possible, counts in the vicinity of these roadworks should avoid the timing of these roadworks.

- It is noted that the Parkside Link Road will not be open before the counts are to be completed. This will need to be a focus of the Do Minimum model development, ensuring that the network changes are in line with the as built information and zone connectors are reviewed to ensure that realistic rerouting of traffic is considered. We will expect this to be covered in the overall Model Validation report.
- The Council would retain the right to ask for additional surveys post opening of the PLR such that checks can be undertaken on the validity of forecast baseline operations.

It appears that Table 6.3 of the Scoping Report, which lists the core ATC links, has been included twice, as both Table 6.2 and Table 6.3 are identical. The list of MCC locations is therefore not included. Figure 6.2 “Core MCC Locations” is however provided, which shows the St Helens locations identified in the table below.

The Highway Engineer notes that the numbering has been amended from that included within the prior Data Collection Specification document that has previously been reviewed, and that locations 101 and 102 (originally included as “Optional” locations) are now within the full list of survey sites. The Locations are considered appropriate.

| | Location of MCC survey |
|-----|--|
| 1 | A599 Penny Lane / Vista Road |
| 2 | A599 Peny Lane / A49 Lodge Lane |
| 3 | Haydock Island Interchange - West (excludes M6 mainline flows) |
| 4 | Haydock Island Interchange - East (excludes M6 mainline flows) |
| 25 | Mill Lane / Church St / Southworth St |
| 26 | Park Rd North / High Street |
| 27 | Golborne St / High Street |
| 28 | Acorn St / Park Rd North |
| 29 | High Street / Crow Lane East |
| 30 | A572 Crow Lane East / Victoria Road |
| 31 | Crow Lane West / Vista Road |
| 32 | Wargrave Rd / Victoria Rd |
| 33 | Acorn St / Wargrave Rd |
| 34 | Park Rd South / Wargrave Rd |
| 101 | Vicarage Rd / Stanley Bank Way |
| 102 | East Lancashire Rd / Liverpool Rd / Stanley Bank Way |

Data Requirements – Automated Traffic Counts

The Automatic Traffic Counts were originally defined within the prior Data Collection Specification Note and are now presented at Table 6.3 of the Scoping Report. The Highway Engineer considers the scope of the ATCs to be sufficient.



As per TAG M1.2, the Highway Engineer suggests that 95% confidence intervals for traffic counts should be calculated from the collected data. We also note as per TAG M1.2 “that splits between light and heavy obtained from ATCs on the basis of a 5.2m vehicle length have been shown to be subject to wide margins of error and should not be relied upon. The National Highways WebTRIS database is based on a 6.6m split, that is deemed more appropriate”.

The Highway Engineer suggests that the supplementary data proposed to be used within the model calibration/validation process are included in the full model specification alongside the proposed MCCs/ATCs, to ensure a full understanding as to how the base model will be updated.

The ATC surveys included in the Scoping Report are considered appropriate in this instance.

Data Requirements Journey Time Surveys

The Highway Engineer considers the scope of the Journey Time Surveys to be sufficient; however, the following observations/comments are raised:

- The method of collection should be recorded alongside the expected sample size to ensure the confidence level is appropriate and in line with TAG guidance.
- Suggest where possible that the journey time routes are consistent to those used in the previous validation, notwithstanding where geographic extents of the model are to be updated.
- Source of Travel Time data (Tom Tom / INRIX, for example) should be specified.

Overall, we hope the above points are considered when finalising the EIA for the development in relation to transport matters. The Highway Engineer agrees with the matters that are proposed to be ‘scoped in’ to the EIA; however, it is considered that the construction traffic aspect should also be ‘scoped in’ to the EIA for the reasons set out above and should not be ‘scoped out’ as currently proposed.

Chapter 7 - Air Quality

Chapter 7 of the Scoping Report considers air quality issues. The Councils Environmental Health Air Quality Officer (“Air Quality Officer”) has reviewed the information, and has provided some comments, which are contained in full at Appendix I of this letter. The following matters have been ‘scoped in’ in relation to air quality for both the construction and operational phases of development:

| Construction Effects | Scoped in or out? | Operation Effects | Scoped in or out? |
|--|-------------------|--|-------------------|
| Chapter 7: Air Quality | | | |
| Dust generated by construction activities | Scoped in | Road vehicle exhaust emissions generated by vehicles travelling to and from the Proposed Development | Scoped in |
| Road vehicle exhaust emissions generated by vehicles travelling to and from the Proposed Development | Scoped in | Rail emissions as a result of an increase of locomotive movements on the rail network | Scoped in |
| | | Air quality impacts as a result of combustion plant (back up CHP) | Scoped in |



The Air Quality Officer does not object to the matters that have been ‘scoped in’ as part of the Scoping Report. The construction effects (construction dust) will be assessed using the EPUK & IAQM Assessment of dust from demolition and construction (2024 guidance), which is acceptable to the Air Quality Officer.

In relation to the operational phase, the methodology for the Air Quality Assessment (“AQA”) will use ADMS Roads, which is a recognised air quality model for this type of assessment. The Air Quality Assessment will consider three scenarios in total consisting of a baseline, a future year with the development scenario and a future year without the development scenario. The input data will use the appropriate traffic data and will use an average background concentration from Defra background maps. All these proposals are acceptable to the Air Quality Officer.

The AQA will consider the impacts of increased traffic. In addition, a rail emissions assessment and details of combustion emissions would also be included. The modelled levels will be assessed against the Air Quality Target Values and the statutory air quality objectives set by the Air Quality (England) Regulations 2000. In terms of mitigation, this would become clear following the results of the AQA, and details will be included within the final EIA. No objections are raised to the approach proposed.

Chapter 8 - Noise and Vibration

Chapter 8 of the Scoping Report considers noise matters. The Councils Environmental Health Noise Officer (“Noise Officer”) has reviewed the information, and has provided some comments, which are contained in full at Appendix I. The following matters have been ‘scoped in’ and ‘scoped out’ in relation to noise and vibration for both the construction and operational phases of development:

| Construction Effects | Scoped in or out? | Operation Effects | Scoped in or out? |
|---------------------------------------|---|---|--|
| Chapter 8: Noise and Vibration | | | |
| Construction traffic noise | Scoped in | Operational road traffic noise on surrounding highway network | Scoped in subject to the spatial scope identified. |
| Construction noise | Scoped in | Operational railway noise from additional freight trains | Scoped in subject to the spatial scope identified. |
| Construction vibration | Scoped in – up to distance of 100 m from nearest construction activity likely to induce vibration | Operational noise from the DCO Site | Scoped in subject to the spatial scope identified. |
| | Scoped out – beyond distance of 100 m from nearest construction activity likely to induce vibration | Operational railway vibration from additional freight trains | Scoped in subject to the spatial scope identified. |
| | | Operational vibration from vehicles travelling along highway network | Scoped out |
| | | Operational vibration from vehicles travelling along Parkside Link Road or new access roads | Scoped out |



The scope of the baseline noise surveys has been agreed with the Noise Officer through previous meetings. The results of the baseline survey information are not yet available for review; however, the Noise Officer would welcome the opportunity to review this information when it does become available.

In relation to the construction phase, the scoping report identifies potential noise and vibration sources, including site preparation, piling, and transportation (in summary). There is a commitment to assess these impacts using appropriate standards such as BS 5228 (noise and vibration control on construction sites) and BS 7385 (evaluation of vibration impact on buildings). The Noise Officer considers the matters that have been 'scoped in' in relation to the construction phase and how these will be assessed as being acceptable.

To mitigate for any potential impacts from the construction phase, a Construction Environment Management Plan ("CEMP") is proposed, which the Noise Officer considers to be standard practice and acceptable.

In terms of the operational phases of the development, the Scoping Report identifies noise sources such as freight train movements, HGV traffic and logistic activities (in summary). The Noise Officer considers that the use of BS 4142 (industrial and commercial sound assessment) and CRTN/DMRB methodologies assess potential impacts is acceptable; however, at this stage, the Scoping Report does not explicitly discuss the assessment of low-frequency noise or ground borne vibration, which may arise from freight train operations. These aspects should be evaluated, particularly for sensitive receptors closest to the proposed railway.

Noise modelling using industry-standard tools (e.g., CadnaA) is proposed to predict impacts at Noise Sensitive Receptors. The Noise Officer considers that this must include the following:

- Worst-case operational scenarios.
- Assessment of both daytime and night-time impacts.
- Vibration effects from rail operations assessed in line with BS 6472 (evaluation of human exposure to vibration in buildings).

There is a commitment in the Scoping Report to consider acoustic barriers, layout design to minimise noise, and operational time restrictions; however, detailed mitigation strategies must be included in the EIA to ensure noise impacts are controlled effectively.

Overall, the Noise Officer does not object to the Scoping Report in terms of the matters that are being 'scoped in' and 'scoped out' of the assessment. When the EIA is finalised, the Noise Officer would like the following included in the final EIA:

- Details of specific mitigation strategies to ensure noise impacts are controlled effectively;
- Details of the baseline survey result; and
- The assessment of low frequency noise and ground borne vibration, which may arise from freight train operations.

Chapter 9 - Landscape and Visual

Chapter 9 of the Scoping Report considers landscape and visual impacts. The Councils Countryside



Development & Woodland Officer has reviewed the information, and has provided some comments, which are contained in full at Appendix I. The following matters have been ‘scoped in’ and ‘scoped out’ in relation to landscape and visual impacts for both the construction and operational phases of development.

| Construction Effects | Scoped in or out? | Operation Effects | Scoped in or out? |
|--|-------------------|--|-------------------|
| Chapter 9: Landscape and Visual Impact | | | |
| Effects on landscape features/landscape fabric within the DCO Site | Scoped in | Effects on landscape features/landscape fabric within the DCO Site | Scoped in |
| Statutory Designated Landscapes | Scoped out | Statutory Designated Landscapes | Scoped out |
| Non-Statutory Designated Landscapes | Scoped out | Non-Statutory Designated Landscapes | Scoped out |
| Effects on National Character Areas | Scoped out | Effects on National Character Areas | Scoped out |
| Effects on Local Character Areas | Scoped in | Effects on Local Character Areas | Scoped in |
| Visual effects | Scoped in | Visual effects | Scoped in |
| Night Time Effects (Lighting) | Scoped in | Night Time Effects (Lighting) | Scoped in |

The Countryside Development & Woodlands Officer considers that the scope and methodology of the Landscape and Visual Impact Assessment (LIVIA) described in Chapter 10 is in accordance with national guidance for the production of a LIVIA. The viewpoints identified are also acceptable and there is an indication that visual representations will be provided as an Illustrative Master Plan. The latter is acceptable for the purposes of undertaking an EIA. Overall, there are no objections to the matters that have been scoped in and ‘scoped out’ in relation to landscape and visual impacts.

Chapter 10 - Ecology & Biodiversity

Chapter 10 of the Scoping Report considers ecology and biodiversity. Merseyside Environmental Advisory Service (“MEAS”) and the Countryside Development & Woodlands Officer have reviewed the information, and have provided some comments, which are contained in full at Appendix I of this letter. The following matters have been ‘scoped in’ and ‘scoped out’ in relation to ecology and biodiversity for both the construction and operational phases of development:



| Construction Effects | Scoped in or out? | Operation Effects | Scoped in or out? |
|---|-------------------|---|-------------------|
| Chapter 10: Ecology and Biodiversity | | | |
| Manchester Mosses SAC (5.45km SE) (will be subject to HRA Stage 1 Screening Report) | Scoped out | Manchester Mosses SAC (5.45km SE) (will be subject to HRA Stage 1 Screening Report) | Scoped out |
| Rixton Clay Pits SAC (7.79km SE) (will be subject to HRA Stage 1 Screening Report) | Scoped out | Rixton Clay Pits SAC (7.79km SE) (will be subject to HRA Stage 1 Screening Report) | Scoped out |
| Highfield Moss SSSI/SBI (adjacent N) | Scoped in | Highfield Moss SSSI/SBI (adjacent N) | Scoped in |
| All other non-statutory sites (17 total within 2km of the DCO Site) | Scoped in | All other non-statutory sites (17 total within 2km of DCO Site) | Scoped out |
| Arable Land | Scoped out | Arable Land | Scoped out |
| Grassland | Scoped in | Grassland | Scoped in |
| Hedgerow | Scoped in | Hedgerow | Scoped in |
| Lines of Trees | Scoped in | Lines of Trees | Scoped in |
| Scattered Trees | Scoped in | Scattered Trees | Scoped in |
| Broadleaved Woodland | Scoped in | Broadleaved Woodland | Scoped in |
| Ponds | Scoped in | Ponds | Scoped in |
| Ditches | Scoped in | Ditches | Scoped in |
| Degradation of Retained Habitats | Scoped in | Degradation of Retained Habitats | Scoped in |
| Invasive non-native Flora | Scoped in | Invasive non-native Flora | Scoped in |
| Amphibians (GCN, smooth newt, palmate newt, common frog, common toad) | Scoped in | Amphibians (GCN, smooth newt, palmate newt, common frog and common toad) | Scoped in |
| Badger | Scoped in | Badger | Scoped in |
| Bats | Scoped in | Bats | Scoped in |
| Birds (breeding) | Scoped in | Birds (breeding) | Scoped in |



| | | | |
|----------------------|------------|----------------------|------------|
| Birds (non-breeding) | Scoped in | Birds (non-breeding) | Scoped in |
| Hedgehog | Scoped in | Hedgehog | Scoped in |
| Invertebrates | Scoped in | Invertebrates | Scoped in |
| Otter | Scoped out | Otter | Scoped out |
| Reptiles | Scoped out | Reptiles | Scoped out |
| Water Vole | Scoped out | Water Vole | Scoped out |

The site is directly adjacent to Highfield Moss SSSI (“HS SSSI”) and is also near to the following designated sites:

- Newton Lake and southern woodland Local Wildlife Site (“LWS”);
- Willow Park LWS;
- Gallows Croft LWS;
- Newton Brook LWS;
- Mesnes Park and Stream LWS; and
- Castle Hill LWS.

MEAS conclude that the HS SSSI will be vulnerable to hydrological, lighting, recreational pressure and air quality changes and any future development will need to ensure harm to the HS SSSI is avoided.

None of the locally designated sites lie within the site boundary; however, the applicant should still consider how in-direct effects on these sites will be avoided, minimised and mitigated. If adverse effects cannot be avoided, options for compensation should be identified. Proposals should only be taken forward where the benefits of the development clearly outweigh the effects on habitats and species.

According to the LCR Ecological Network, part of the Knowsley and St Helens Mosslands Nature Improvement Area (“NIA”) falls within the site (directly adjacent to the western boundary of HS SSSI). In addition, the LCR Ecological Network shows that habitats within the western rail chord (woodland, grassland, and wetland habitats) are part of a Core Biodiversity Area (“CBA”). MEAS conclude that the development should be designed to incorporate the NIA and CBAs and include avoidance measures to prevent harm. If protection measures are insufficient to prevent harm, then compensation may be required.

An ecological desktop study has been undertaken and the data sources used for this have been listed in paragraph 10.43 of the Scoping Report; however, MEAS would advise that the desktop study should also include the LCR Ecological Network and details of the NIA and CBAs (described above).

In respect of the ecological surveys, not all the sites have been surveyed yet. Further survey work in relation to the western rail chord (Parkside West), are due to take place in 2025 (as set out in MEASs response at Appendix I). The following surveys were undertaken across accessible areas of the site in 2024:

- UK Habitat Classification / Phase I ecological walkover (August 2024);



- Badger survey (August 2024);
- Bats - activity surveys (April-October 2024);
- Bats - static detector deployments (April-October 2024);
- Great Crested Newt eDNA surveys of off-site ponds (June 2024);
- Breeding Bird surveys (April-July 2024); and
- Wintering Bird surveys (October 2023-March 2024).

Paragraph 10.46 of the Scoping Report states that impacts to water voles and otters have been scoped out, which is acceptable, due to the absence of riparian habitat. The Scoping Report also concludes that due to the agricultural nature of the site, this provides no opportunities for reptiles; however, MEAS concludes that railway line land falls within the site boundary and it should therefore be considered whether this provides any suitability for reptiles.

MEAS advises that as part of any survey work to be undertaken in 2025 that copies of eDNA results from the testing laboratory be included in an EIA for verification purposes (where applicable).

In respect of breeding bird surveys, some of these have already been undertaken, and MEAS note that the survey work is to be extended across the whole site. MEAS state that best practice guidance recommends that six survey visits are undertaken. If less than this is completed, then MEAS advise that justification should be provided. In addition, MEAS also advises that the breeding bird survey should also include surveys of any affected buildings and structures, by a licensed ecologist, for barn owl. In relation to the non-breeding bird survey, MEAS advises that the survey methodology is amended to include vantage points in addition to only walked transects.

MEAS consider it unlikely that habitats within the site will be functionally linked to internationally designated sites, such as the Mersey Estuary Special Protection Area and Ramsar. Special Protection Areas ("SPAs") and Ramsar sites on the Merseyside coast have not been referenced for inclusion in the assessment, which MEAS accepts, subject to the results of the non-breeding bird surveys.

Regarding habitats, arable habitat has been scoped out due to its overall insignificance within the context of similar habitat locally. MEAS have no objection to this, subject to the results of the breeding and non-breeding bird surveys. The identified potential effects on species are broad at this stage, which MEAS accepts.

In terms of the operational phase of development, MEAS note that there could be impacts to HM SSSI due to increased recreation use. In addition, a lack of habitat management has also been identified as a potential operational phase impact. Regarding protected and notable species, disturbance associated with maintenance of the proposed development, including the use of artificial lighting, increased noise and general habitat degradation has been identified as a potential impact and this is acceptable at this stage.

Given that there will no doubt be ecological impacts during the construction and operational phases of the development, the Scoping Report at paragraphs 10.78 – 10.84 does set out some avoidance / mitigation principles for both phases of the development (these measures are also set out in the response from MEAS at Appendix I). MEAS have reviewed these measures and conclude that the principles are acceptable. MEAS also state that the actual scope of mitigation required for protected and notable species is yet to be determined and will become clearer on completion of the baseline surveys, which is confirmed in the Scoping Report.



MEAS welcome that a Biodiversity Net Gain (“BNG”) Assessment will be undertaken. There are not many off-site options for achieving BNG locally at this stage. Therefore, the applicant should seek to follow the Biodiversity Gain Hierarchy and retain as much of the existing habitat as possible in the first instance.

The Countryside Development & Woodlands Officer advises that Arboricultural Implications Reports, including a Tree Survey and Tree Constraints Plan, are carried out as part of the EIA process. The outcome of these surveys is likely to influence the outcomes and mitigation that may be identified as part of and LIVIA and/or Biodiversity Net Gain Assessments.

MEAS have considered the list of ecological receptors and whether they are to be ‘scoped in’ or ‘scoped out’ of the EIA. Construction phase impacts to locally designated sites have been ‘scoped in’ for further assessment, but adverse impacts are considered unlikely due to the separating distance and lack of potential impact pathways, which is accepted by MEAS. Reptiles have been scoped out; however, MEAS have indicated that this may need further consideration. In addition, impacts to the NIA and CBA should also be considered. MEAS have not raised any objections or comments in relation to the matters that are ‘scoped in’ for the operational phase of development.

Chapter 11 - Built Heritage

Chapter 11 of the Scoping Report considers built heritage. The Councils Conservation Officer has reviewed the information, and has provided some comments, which are contained in full at Appendix I of this letter. The following matters have been ‘scoped in’ and ‘scoped out’ in relation to built heritage for both the construction and operational phases of development:

| Construction Effects | Scoped in or out? | Operation Effects | Scoped in or out? |
|---|-------------------|---|-------------------|
| Chapter 11: Built Heritage | | | |
| Designated Heritage Assets within the DCO Site: <ul style="list-style-type: none"> Huskisson Memorial on South Side of Railway 60 Metres from Road (Grade II) Registered Historic Battlefield of Winwick | Scoped In | Designated Heritage Assets within the DCO Site: <ul style="list-style-type: none"> Huskisson Memorial on South Side of Railway 60 Metres from Road (Grade II) Registered Historic Battlefield of Winnick | Scoped in |



| | | | |
|---|-----------|---|-----------|
| Non-Designated Heritage Assets within the DCO Site: <ul style="list-style-type: none"> • Parkside Road Bridge | Scoped in | Non-Designated Heritage Assets within the DCO Site: <ul style="list-style-type: none"> • Parkside Road Bridge | Scoped in |
| Designated Heritage Assets surrounding the DCO Site (1km): <ul style="list-style-type: none"> • Newton Park Farmhouse (Grade II) • Barn to East of Newton Park Farmhouse (Grade II) • Barn to North of Woodhead Farmhouse (Grade II) • Woodhead Farmhouse (Grade II) • St Oswald's Well in Field to South of Woodhead Farmhouse (Grade II and Scheduled Monument) • Wall, Gates and Gate Piers to Front of Kenyon Hall (Grade II) • Holly House (Grade II) • Barrow Farmhouse (Grade II) • Newton-le-Willows Station (Grade II) • Newton Viaduct to West of Station (Grade II) • High Street and Willow Park Conservation Area (inclusive of heritage assets within its boundary) | Scoped in | Designated Heritage Assets surrounding the DCO Site (1km): <ul style="list-style-type: none"> • Newton Park Farmhouse (Grade II) and Barn to East of Newton Park Farmhouse (Grade II) • Woodhead Farmhouse (Grade II) and Barn to North of Woodhead Farmhouse (Grade II) • St Oswald's Well in Field to South of Woodhead Farmhouse (Grade II and Scheduled Monument) • Wall, Gates and Gate Piers to Front of Kenyon Hall (Grade II) • Holly House (Grade II) • Barrow Farmhouse (Grade II) • Newton-le-Willows Station (Grade II) • Newton Viaduct to West of Station (Grade II) • High Street and Willow Park Conservation Area (inclusive of heritage assets within its boundary) | Scoped in |
| Non-Designated Heritage Assets surrounding the DCO Site (1km): <ul style="list-style-type: none"> • Highfield Farm Barn | Scoped in | Non-Designated Heritage Assets surrounding the DCO Site (1km): <ul style="list-style-type: none"> • Highfield Farm Barn | Scoped in |

| | | | |
|--|------------|---|------------|
| <ul style="list-style-type: none"> • Railway Connecting Manchester to Liverpool Line with the Warrington to Preston Line • Kenylo Bridge, Sandy Brow Lane (LLB) • Oven Back Farm (LLB) • Gerosa Avenue (LLB) • Rose Mount Terrace (LLB) • Monk House (LLB) • The Cottage (LLB) • Pipers Hole Cottage (LLB) | | <ul style="list-style-type: none"> • Railway Connecting Manchester to Liverpool Line (the Chat Moss Line) with the Warrington to Preston Line (West Coast Mainline) • Kenylo Bridge, Sandy Brow Lane (LLB) • Oven Back Farm (LLB) • Gerosa Avenue (LLB) • Rose Mount Terrace (LLB) • Monk House (LLB) • The Cottage (LLB) • Pipers Hole Cottage (LLB) | |
| Designated Heritage Assets surrounding the DCO Site (1km), unlikely to be affected: <ul style="list-style-type: none"> • Bowl Barrow West of Highfield Lane (Scheduled Monument) • Castlehill Motte and Bailey and Bowl Barrow (Scheduled Monument) | Scoped out | Designated Heritage Assets surrounding the DCO Site (1km), unlikely to be affected: <ul style="list-style-type: none"> • Bowl Barrow West of Highfield Lane (Scheduled Monument) • Castlehill Motte and Bailey and Bowl Barrow (Scheduled Monument) | Scoped out |
| Non-Designated Heritage Assets surrounding the DCO Site (1km), unlikely to be affected: <ul style="list-style-type: none"> • No. 149 Mill Lane • The Millstone Public House • Nos. 45-51 Golborne Dale Road No. 6 Bull Houses • Nos. 18-14 Bull Houses | Scoped out | Non-Designated Heritage Assets surrounding the DCO Site (1km), unlikely to be affected: <ul style="list-style-type: none"> • No. 149 Mill Lane • The Millstone Public House • Nos. 45-51 Golborne Dale Road No. 6 Bull Houses • Nos. 18-14 Bull Houses | Scoped out |

| | | | |
|--|--|--|--|
| <ul style="list-style-type: none"> • Highfield, Kenyon Lane (LLB) | | <ul style="list-style-type: none"> • Highfield, Kenyon Lane (LLB) | |
|--|--|--|--|

The Conservation Officer has no objections to the matters that have been 'scoped in' and 'scoped out' in relation to built heritage. The Conservation Officer considers that the methodology employed is sound and the 1km study area to be acceptable.

The baseline study is also acceptable, and the likely impacts of the works have been considered. The principal concern for the Conservation Officer is the impact of the relocation of the listed Huskisson Memorial; however, it is acknowledged at this early stage that there are likely some public benefits achieved from its forced relocation, including a better public appreciation/understanding of the event



and why there is a memorial to mark the event.

Chapter 12 - Archaeology

Chapter 12 of the Scoping Report considers archaeology. MEAS has reviewed the information, and has provided some comments, which are contained in full at Appendix I. The following matters have been ‘scoped in’ and ‘scoped out’ in relation to archaeology for both the construction and operational phases of development:

| Construction Effects | Scoped in or out? | Operation Effects | Scoped in or out? |
|--------------------------------|-------------------|-----------------------|-------------------|
| Chapter 12: Archaeology | | | |
| Prehistoric Remains | Scoped in | Prehistoric Remains | Scoped out |
| Roman Remains | Scoped in | Roman Remains | Scoped out |
| Medieval Remains | Scoped in | Medieval Remains | Scoped out |
| Post-medieval Remains | Scoped in | Post-medieval Remains | Scoped out |

MEAS agree that archaeology should be scoped into the EIA and do not object to the matters that have been ‘scoped in’ and ‘scoped out’ of this Chapter.

MEAS note that this Chapter has been prepared without having consulted all the relevant Historic Environment Records (“HERs”). The area immediately to the south of the site is in Warrington Borough, which is covered by Cheshire Historic Environment Record (cf. section 12.13). Given that not all HERs have been consulted in the study area, this has led to some errors in the baseline assessment (e.g., paragraph 12.14 (bullet point three) states that there is only one Scheduled Monument within 1km of the site, however, there are two more to the south). This has meant that the character of the surrounding area has not been fully considered at this stage (e.g., CHER contains records in the wider area for more barrows, a Romano-British farmstead, and the extensive early medieval Christian cemetery at Southworth Hall Farm).

MEAS considers that notwithstanding the incomplete baseline, the Scoping Report’s conclusions regarding archaeology are broadly correct and acceptable, i.e., that archaeology should be scoped into the EIA.

Chapter 13 - Hydrology

Chapter 13 of the Scoping Report considers hydrology. The Councils Lead Local Flood Authority (“LLFA”) has reviewed the information, and has provided some comments, which are contained in full at Appendix I. The following matters have been ‘scoped in’, in relation to Hydrology for both the construction and operational phases of development:



| Construction Effects | Scoped in or out? | Operation Effects | Scoped in or out? |
|--------------------------------------|--|--------------------------------------|--|
| Chapter 13: Hydrology | | | |
| Flood risk | All to be scoped in, with the exception of flood risk from coastal, reservoir and canal sources. | Flood risk | All to be scoped in, with the exception of flood risk from coastal, reservoir and canal sources. |
| Surface water – quantity and quality | | Surface water – quantity and quality | |
| Foul Water – quantity and quality | | Foul Water – quantity and quality | |
| Potable water supply | | Potable water supply | |

The LLFA is largely supportive of the information provided in Chapter 13, including the baseline data, and the scope of hydrological impacts. The LLFA have set out a list of policies, and guidance that the applicant should consider when finalising the EIA which are as follows:

- Local Plan Policy LPC12 (Flood Risk and Water Management)
- Sankey Catchment Action Plan
- Sustainable Drainage Systems (SuDS) 2020 Design and Technical Guidance
- Sustainable Drainage Systems (SuDS) 2020 Checklist
- St Helens Council land Drainage Byelaws 2013
- Flood and Water Management Strategy 2020

The LLFA would advise that baseline data in support of water infiltration via Bre-365 infiltration testing is carried out, as part of any SuDS hierarchy assessment and that infiltration to ground is a preferred option; however, being close to the M6 Motorway and near water aquifers, it is acknowledged that infiltration could be ruled out. The LLFA supports the proposal for a CEMP, which would mitigate the risk of contaminants via the hydrologic process. The LLFA advises that a phasing development plan should also be included to reduce and manage the risk of surface water flow during construction and any temporary storm water storage areas.

In relation to climate change, it should be noted that 45% is the Councils climate change baseline figure at this time. In terms of surface water discharge rate, the LLFA requests a betterment of 50% reduction of existing surface water flow rates.

The LLFA advises that the Sustainable Drainage Systems (SuDS) 2020 Design and Technical Guidance and the associated checklist should be used as a tool. The document sets out the full requirements needed, and these are set out in full within the response from the LLFA contained at Appendix I

The LLFA has no objection to the areas that have been ‘scoped out’ of the document as set out above; however, the LLFA do also conclude that it would be helpful to provide greater detail as to why these areas have been scoped out within any future EIA. Overall, the LLFA agrees with the matters that have been ‘scoped in’ to the EIA in Chapter 13. In formulating the next stages of the EIA, the LPA would request consideration to be given to the documents referred to by the LLFA and the requirements of Local Plan Policy LPC12.



Chapter 14 - Geology, Soils & Contaminated Land

Chapter 14 of the Scoping Report considers Geology, Soils and Contaminated Land. The Councils Environmental Health Officer for Contaminated Land (“Contaminated Land Officer”) has reviewed the information, and has provided some comments, which are contained in full at Appendix I. The following matters have been ‘scoped in’ and ‘scoped out’ in relation to geology, soils, and contaminated land for both the construction and operational phases of development:

| Construction Effects | Scoped in or out? | Operation Effects | Scoped in or out? |
|---|-------------------|--|-------------------|
| Chapter 14: Geology, Soils and Contaminated Land | | | |
| Impacts on receptors from Contamination and Ground Gas arising from the DCO Site and nearby | Scoped in | Loss of minerals resource | Scoped in |
| Impacts on or loss of Soils and Geology as a resource | Scoped out | Hydrogeological changes impacting upon Highfield Moss SSSI | Scoped in |
| Impacts on receptors from construction related activities | Scoped out | Mining related impacts | Scoped out |
| Encountering UXO | Scoped out | | |

The Contaminated Land Officer states that the Scoping Report refers to a draft Phase 1 Geo Environmental Assessment (“draft Phase 1”) that has been prepared for the site based on various sources. It is understood that the draft Phase 1 will be submitted as part of the Preliminary Environmental Information Report (“PEIR”), which will be subject to a period of consultation in Autumn 2025. It would have been helpful to have had sight of the draft Phase 1 report in reviewing the Scoping Request as clearly this has informed the information set out Chapter 14.

Notwithstanding this, the Council does have some information on file including historic OS mapping, geological maps, mining constraints mapping, etc. Therefore, the Contaminated Land Officer has been able to corroborate much of the information referred to in Chapter 14.

The Contaminated Land Officer concludes that the site is comprised primarily of undeveloped agricultural land. Significant contamination issues are therefore not considered to be present, however localised areas of made ground are anticipated to be present associated with the backfilling of historical ponds and in the vicinity of farm buildings, the M6 and the Chat Moss Railway Line. The Scoping Report advises that such areas will be targeted to understand the depth and extent of made ground and any associated contamination issues in due course. The Scoping Report also acknowledges that earthworks at the site and the associated reuse of soils would need to be facilitated by a materials management plan (“MMP”) under the CL:AIRE DoWCoP and that a CEMP would also be required.

The Scoping Report sets out a series of criteria for assessing both the sensitivity of identified receptors and the magnitude of any impacts that might occur. The Contaminated Land Officer agrees with the criteria and considers this to be a sound basis for assessment. The Contaminated Land Officer also agrees with the matters that have been ‘scoped in’ and ‘scoped out’ in relation to Chapter 14.

MEAS have also provided some comments in relation to Chapter 14. MEAS conclude that there is



limited discussion on land use, specifically on the loss of agricultural land as a soil resource. Chapter 10 (Ecology & Biodiversity) at paragraph 10.74 of the Scoping Report it states that arable habitat has been 'scoped out' of the assessment from an ecological perspective (owing to its overall insignificance within the context of similar habitat locally), and that an Agricultural Land Classification (ALC) assessment will be undertaken.

MEAS note that impacts on the loss of soils as a resource is proposed to be 'scoped out', as these will be managed through embedded mitigation as part of a CEMP and MMP. MEAS advise that a further assessment of the loss of agricultural land is required before this should be 'scoped out'. The site represents a significant soil resource as well as carbon storage and MEAS concludes that this should be 'scoped in' unless clear justification is provided.

Chapter 15 - Materials & Waste

Chapter 15 of the Scoping Report considers materials and waste. MEAS has reviewed the Chapter, and has provided some comments, which are contained in full at Appendix I. The following matters have been 'scoped in' in relation to materials and waste for both the construction and operational phases of development.

| Construction Effects | Scoped in or out? | Operation Effects | Scoped in or out? |
|---|-------------------|---------------------------------|-------------------|
| Chapter 15: Materials and Waste | | | |
| Waste arisings from demolition | Scoped in | Waste arisings during operation | Scoped in |
| Waste arisings from enabling works and construction | Scoped in | | |

The applicant intends to follow the waste hierarchy and a Site Waste Management and Materials Plan ("SWMMP"), which would be prepared in conjunction with a CEMP. Section 15.82 of the Scoping Report states that the cut and fill/earthworks strategy will aim to achieve a balance. If this is unachievable, then receiver sites will be found with the reuse of soil facilitated under the Site Waste Management Plan and a Materials Management Plan. If significant material is to be imported or exported to facilitate development this may need to be considered within the associated topic Chapters such as Transport and Air Quality. Overall, MEAS conclude the scope of this Chapter to be acceptable.

The Climate Change Officer has also reviewed this Chapter and is satisfied at this early stage of the process. As set out above, there would be considerable quantities of material from excavation and demolition, which would need to be considered further in a SWMMP, which the Climate Change Officer supports. The Climate Change Officer has also highlighted that all operational waste from businesses with more than 10 employees, which is yet to be determined, will need to arrange separate food waste collections and separate dry mixed recycling streams (glass, paper and cardboard, plastic, and metal) by the end of March 2025.



Chapter 16 - Energy & Climate Change

Chapter 16 of the Scoping Report considers energy and climate change. The Council's Climate Change Officer has reviewed the Chapter, and has provided some comments that are contained in full at Appendix I. The following matters have been 'scoped in' in relation to energy and climate change for both the construction and operational phases of development:

| Construction Effects | Scoped in or out? | Operation Effects | Scoped in or out? |
|---|-------------------|--|-------------------|
| Chapter 16: Energy and Climate Change | | | |
| Effect of Proposed Development on climate change (construction stage GHG emissions) | Scoped in | Effect of Proposed Development on climate change (operational stage GHG emissions), focussing on the primary direct and indirect effects of the Proposed Development ¹¹ | Scoped in |
| Climate change resilience | Scoped in | Climate change resilience | Scoped in |

The Climate Change Officer is satisfied at this early stage that the climate change implications have been considered and does not have any concerns on the matters that have been 'scoped in'. There is a plan to include renewable/low carbon energy, which is required under Local Plan Policy LPC13 and, in addition, landscaping is also considered in the context of climate resilience, which is supported.

Whilst there are no concerns in relation to the matters that have been 'scoped in', the Climate Change Officer considers that a greater level of detail in relation to energy consumption will be required to satisfy Local Plan Policy LPC13. In addition, further operational emissions data should also be considered in the Waste Management Plan and in relation to transport.

Chapter 17 - Socioeconomics

Chapter 17 of the Scoping Report considers socioeconomics. The following matters have been 'scoped in' and 'scoped out' in relation to socioeconomics for both the construction and operational phases of development:

| Construction Effects | Scoped in or out? | Operation Effects | Scoped in or out? |
|--|-------------------|--|-------------------|
| Chapter 17: Socio-economics | | | |
| Impact on residents who could work on the construction of the Proposed Development | Scoped in | Impact on residents who could benefit from employment opportunities at the Proposed Development once operational | Scoped in |
| Impact on economic output as a result of temporary construction activity | Scoped in | Impact on local industrial and logistics businesses | Scoped in |



| | | | |
|--|------------|--|-----------|
| Temporary disruption caused to local businesses and employment uses | Scoped in | Impact on the skills and training levels of the local labour force | Scoped in |
| Impact on local social infrastructure as a result of an increase in on-site jobs | Scoped out | Impact on economic output as a result of permanent operations | Scoped in |
| Impact on demand for housing within the labour market area due to increased operational employment | Scoped in | Impact on Local Authority Revenues | Scoped in |
| Impact on land use and accessibility (including private property and housing, development land, community land and assets, businesses, agricultural land holdings; walkers, cyclists and horse-riders) | Scoped in | Impact on demand for housing within the labour market area due to increased operational employment | Scoped in |

The LPA would request that the St Helens Borough Council Inclusive Growth Strategy and St Helens Borough Council Social Value Policy are considered, along with the Local Economy Supplementary Planning Document (“LE SPD”) when finalising this Chapter.

The applicant should be aware that the LPA is currently working on updating several of its SPDs, including the LE SPD, which will include matters relating to social value. It is anticipated that the new LE SPD will be adopted in early/mid-2025, which means that the requirements of the updated SPD will need to be considered when finalising the EIA (given the likely timescales).

In terms of the range of stakeholders to consult, the LPA would suggest that the applicant takes the time to engage with the St Helens Ways to Work Team and the LCRCA. The LPA welcomes any opportunity to secure employment or apprenticeship opportunities for local residents during the construction or operational phases of the project.

It should be noted that in paragraph 17.20 of the Scoping Report, it states that based on the 2019 Indices of Multiple Deprivation St Helens Borough Council is ranked as 40th overall. This figure may need checking as our records show that it is lower at 26th. Overall, it is considered that the demographic information set out for St Helens is agreed, and there are no concerns with the matters that have been ‘scoped in’ in relation to socioeconomics.

Chapter 18 - Population & Human Health

Chapter 18 of the Scoping Report considers population and human health. The following matters have been ‘scoped in’ and ‘scoped out’ in relation to population and human health for both the construction and operational phases of development:

| Construction Effects | Scoped in or out? | Operation Effects | Scoped in or out? |
|--|-------------------|-------------------|-------------------|
| Chapter 18: Population and Human Health | | | |
| Physical activity | Scoped in | Physical activity | Scoped in |



| | | | |
|---|------------|---|------------|
| Risk taking behaviour | Scoped in | Risk taking behaviour | Scoped out |
| Diet and nutrition | Scoped out | Diet and nutrition | Scoped out |
| Housing | Scoped out | Housing | Scoped out |
| Relocation | Scoped out | Relocation | Scoped out |
| Open space, leisure and play | Scoped in | Open space, leisure and play | Scoped in |
| Transport modes, access and connections | Scoped in | Transport modes, access and connections | Scoped in |
| Community safety | Scoped out | Community safety | Scoped out |
| Community identity, culture, resilience and influence | Scoped in | Community identity, culture, resilience and influence | Scoped in |
| Social participation, interaction and support | Scoped in | Social participation, interaction and support | Scoped out |
| Education and training | Scoped out | Education and training | Scoped out |
| Employment and income | Scoped in | Employment and income | Scoped in |
| Climate change mitigation and adaptation | Scoped in | Climate change mitigation and adaptation | Scoped in |
| Air quality | Scoped in | Air quality | Scoped in |
| Water quality or availability | Scoped out | Water quality or availability | Scoped out |
| Land quality | Scoped out | Land quality | Scoped out |
| Noise and vibration | Scoped in | Noise and vibration | Scoped in |
| Radiation | Scoped out | Radiation | Scoped out |
| Health and social care services | Scoped in | Health and social care services | Scoped out |
| Built environment | Scoped out | Built environment | Scoped out |
| Wider societal infrastructure and resources | Scoped out | Wider societal infrastructure and resources | Scoped out |

There are no objections or concerns raised in relation to the matters that have been 'scoped in' for the Population and Human Health Chapter. In terms of the matters that have been 'scoped out' e.g., the impact on wider societal infrastructure and resources, this should potentially be 'scoped in', or at least further justification provided as to why it has been scoped out. It is considered that further justification should be set out in the final EIA in relation to the matters that have been 'scoped out' in this Chapter. This is to ensure that all matters are fully considered relating to all relevant contexts rather than suggesting that they have been 'scoped out' as they would be considered in different chapters.



Chapter 19 - Major Accidents & Disasters

Chapter 19 of the Scoping Report considers major accidents & disasters. The following matters have been ‘scoped in’ in relation to major accidents & disasters for both the construction and operational phases of development:

| Construction Effects | Scoped in or out? | Operation Effects | Scoped in or out? |
|--|-------------------|--|-------------------|
| Chapter 19: Major Accidents and Disasters | | | |
| Construction hazards | Scoped in | Flooding and damage due to severe weather events; major transport and industrial accidents; malicious attacks; transportation of hazardous loads; hazardous waste; increased rail freight movements. | Scoped in |

There are no objections or concerns raised in relation to the matters that have been ‘scoped in’ in relation to the Major Accidents & Disasters Chapter.

Chapter 20 - Cumulative and In-combination Effects

Chapter 20 of the Scoping Report relates to ‘cumulative and in combination effects. To help establish what the potential effects could be in this regard, the applicant has adopted an approach that is taken from advice issued by the Planning Inspectorate (“PINS”) on how to approach the Cumulative Effects Assessment (“CEA”) in the context of NSIPS. PINS encourage applicants to follow a methodological approach where it is appropriate to do so, and the applicant intends to adopt this approach where possible. There are 4 stages to the assessment, which are as follows (in summary):

- Stage 1: Establishing the long list of other existing and. or approved developments
- Stage 2 Establishing a shortlist of other existing and, or approved developments
- Stage 3: Information gathering
- Stage 4 Assessment

The applicant is at Stage 1 in the process. To help inform the first stage of assessing the potential cumulative effects, a Zone of Influence (“ZOI”) in respect of each of the technical chapters of the Scoping Report needs to be agreed. The applicant has set out a potential ZOI at Table 20.1 from the draft order limits (illustrated at Figure 1.1) of the Scoping Report. The technical consultees have reviewed the ZOI for their relevant discipline, and no objections or concerns have been raised.

In addition to agreeing the ZOI, the applicant intends to develop a list of ‘other developments’ as required by Stage 1 (above) through a desk-based study using the following sources of information:

- Planning Register searches of St Helens Borough Council, Wigan Council and Warrington Borough Council;
- Review of Development Plan documents of St Helens Borough Council, Wigan Council and Warrington Borough Council and minerals and waste plan documents of Liverpool City Region and the Greater Manchester Authority;
- Greater Manchester Region Combined Authority Places for Everyone Plan;
- Cumulative site lists provided by the respective LPAs; and
- PINS’s online NSIP register.



The LPA support the scope of the applicant's desk-based search proposals but can only comment in relation to St Helens. The applicant asserts in the Scoping Report that some significant projects have already been identified as part of Stage 1, including:

- ‘Phase 1: Land Site of Former Parkside Colliery, Winwick Road, Newton Le Willows, St Helens (P/2018/0048/OUP and APP/2020/0007/CALL) and the respective Reserved Matters applications (P/2023/0341/RES and P/2023/0342/RES)’; and
- Phase 2: Hybrid application for former Parkside Colliery comprising up to 154,612 m2 of employment floorspace (P/2024/0419/HYEIA).

The above sites are part of the Parkside West allocation in the St Helens Local Plan under Policy 8EA. The LPA would agree that these developments would need to be included as part of any cumulative assessment. In addition to the sites identified above for St Helens, the LPA would also want to see the following sites included as part of any cumulative assessment:

| Possible Cumulative Development | Details | Status | Justification |
|---|--|---------------------------------|---|
| Parkside Link Road (“PLR”) | Formation of a new link road between A49 (Winwick Road) and M6 Junction 22, including the realignment of Parkside Road and other associated works Planning App Ref: P/2018/0249/FUL | Approved and constructed | Potential relationship in terms of all technical areas |
| Vulcan Works – Land encompassing Vulcan Works, Wargrave Road, Newton-le-Willows | Planning App Ref: P/2003/1461 & Appeal Ref: APPH4315/V/06/12000 38 and subsequent reserved matters and planning applications. | Approved and under construction | Potential relationship in terms of traffic on the highway network, air quality and traffic noise Potential relationship in terms of socio economic and Human Health |
| Land to the north of Penny Lane and West of M6, Penny Lane, Haydock | Planning App Ref: P/2015/0571 Hybrid Application: Full planning permission for erection of B8 warehousing (11,689 sqm), ancillary office space, associated | Approved and under construction | Potential relationship in terms of traffic on the highway network, air quality and traffic noise Potential relationship in terms of socio economic and Human Health |



| | | | |
|---|---|--|---|
| | parking and access spine road from Penny Lane. Outline planning permission for erection of B8 warehouse (34,653 sqm), ancillary office space, parking and landscaping | | |
| Land South of Penny Lane, Haydock | Site allocation for employment development in the adopted St Helens Local Plan (Site Reference 4EA) | Site Allocation | Potential relationship in terms of traffic on the highway network, air quality and traffic noise Potential relationship in terms of socio economic and Human Health |
| Land off Haydock Lane Land at West of Haydock Industrial Estate Planning | Site allocation for employment development in the adopted St Helens Local Plan (Site Reference 5EA) Planning App Ref: P/2022/0785/FUL for a full planning application for the construction of four employment units for flexible use across classes E (g iii) B2 and B8 with ancillary offices, security gatehouses, car parking, service yards, infrastructure, landscaping and associated works. | Site Allocation and planning approval | Potential relationship in terms of traffic on the highway network, air quality and traffic noise Potential relationship in terms of socio economic and Human Health |
| Land west of Millfield Lane, south of Liverpool Road and north of Clipsley Brook, Haydock | Site allocation for employment development in the adopted St Helens Local Plan (Site Reference 6EA) | Site Allocation and pending planning application | Potential relationship in terms of traffic on the highway network, air quality and traffic noise Potential relationship in terms of socio economic and Human Health |



| | | | |
|---|---|---|--|
| | <p>Planning App Ref: P/2024/0045/FUL for the construction of new employment units for flexible use across Classes E (giii) B2 & B8 with ancillary offices, car parking, servicing yards, infrastructure, landscaping, ancillary structures and associated works plus the provision of access to the site from Millfield Lane and Liverpool Road</p> | | |
| <p>Land west of the A49 Mill Lane and to the east of the West Coast Mainline, Newton-le-Willows</p> | <p>Site allocation for residential development in the adopted St Helens Local Plan (Site Reference 7HA) (notional capacity 140 units)</p> | <p>Site Allocation</p> | <p>Potential relationship in terms of traffic on the highway network, air quality and traffic noise Potential relationship in terms of socio economic and Human Health</p> |
| <p>Land at Florida Farm (south A580), Slag Lane, Blackbrook</p> | <p>Site allocation for residential development in the adopted St Helens Local Plan (Site Reference 2HA)</p> <p>Planning App Ref: P/2023/0512/FUL for a full planning application for the erection of 456 dwellinghouses, with associated access, car parking, landscaping and infrastructure.</p> | <p>Site Allocation and pending planning application</p> | <p>Potential relationship in terms of traffic on the highway network, air quality and traffic noise Potential relationship in terms of socio economic and Human Health</p> |



| | | | |
|---|--|--|--|
| <p>Land West of Lodge Lane, Haydock St Helens</p> | <p>Planning App Ref: P/2022/0063/OUP - Outline planning permission, all matters reserved except for access for a residential development (up to 130 units) - Approved</p> | <p>Approved Planning Application.</p> | <p>Potential relationship in terms of traffic on the highway network, air quality and traffic noise Potential relationship in terms of socio economic and Human Health</p> |
| <p>Land West of Mill Lane, Newton-le-Willows</p> | <p>Planning App Ref: P/2023/0619/FUL - Resubmission of full planning application P/2022/0575/FUL for the residential development for 92 dwellings including access, associated works and landscaping</p> | <p>The planning application was refused. However, the scheme is subject of a planning appeal reference: APP/H4315/W/24/33 50503. If the Planning Inspectorate approves the application, then it should be considered in the cumulative assessment.</p> | <p>Potential relationship in terms of traffic on the highway network, air quality and traffic noise Potential relationship in terms of socio economic and Human Health</p> |
| <p>Land bounded by Stanley Street to the north and northwest, Haydock Street and Queen Street to the east, Market Street to the west, and Queen Street and Market Street to the south, Earlestown</p> | <p>Planning App Ref: P/2022/0213/HYBR - Hybrid planning application seeking – full planning permission for demolition in the Conservation Area for the demolition of the public toilet and commercial building in the corner of Market Square and site preparation works and outline planning permission for the erection of retail kiosks (use class E(a)) and development of a proposed covered market canopy, with associated access,</p> | <p>Approved planning application and pending reserved matters application</p> | <p>Potential relationship in terms of traffic on the highway network, air quality and traffic noise Potential relationship in terms of socio economic and Human Health</p> |



| | | | |
|---|--|--------------------------------------|--|
| | <p>servicing, parking, highway works and landscaping with all matters reserved (Access, Appearance, Landscaping, Layout and Scale) reserved for future consideration.</p> <p>All subsequent reserved matters applications should also be considered.</p> | | |
| <p>Land adjacent to Unit 2 Moore Park Way, St Helens,</p> | <p>Planning App Ref: P/2022/807/FUL for the erection of 1no commercial/industrial building comprising a B8 unit with ancillary office and the provision of associated access and infrastructure works (including roads, car and cycle parking, landscaping and substation.</p> | <p>Approved Planning Application</p> | <p>Potential relationship in terms of traffic on the highway network, air quality and traffic noise Potential relationship in terms of socio economic and Human Health</p> |
| <p>Omega South Western Extension Land North of Finches Plantation, Bold</p> | <p>Site allocation for employment development in the adopted St Helens Local Plan (Site Reference 1EA)</p> | <p>Site Allocation</p> | <p>Potential relationship in terms of traffic on the highway network, air quality and traffic noise Potential relationship in terms of socio economic and Human Health</p> |
| | <p>Planning Application ref: P/2020/0061/HYBR and subsequent s.73 applications for: Hybrid Planning Application for the following development</p> | <p>Approved Planning Application</p> | <p>Potential relationship in terms of traffic on the highway network, air quality and traffic noise Potential relationship in terms of socio economic and Human Health</p> |



| | | | |
|--|--|------------------------------------|--|
| | <p>(major development); (i) Full Planning Permission for the erection of a B8 logistics warehouse, with ancillary offices, associated car parking, infrastructure and landscaping; and (ii) Outline Planning Permission for Manufacturing (B2) and Logistics (B8) development with ancillary offices and associated access infrastructure works (detailed matters of appearance, landscaping, layout and scale are reserved for subsequent approval)</p> <p>All subsequent reserved matters applications should be considered.</p> | | |
| <p>Land to the East of M6 Junction 23 (South of Haydock racecourse), Haydock</p> | <p>Employment Safeguarded site allocation reference 2ES in the St Helens Local Plan</p> | <p>Safeguarded site allocation</p> | <p>Potential relationship in terms of traffic on the highway network, air quality and traffic noise Potential relationship in terms of socio economic and Human Health</p> |
| <p>Land East of Newlands Garage (former Vulcan works) and West of the West Coast mainline, Newton-le-Willows</p> | <p>Residential development Safeguarded Site Reference 4HS in the St Helens Local Plan</p> | <p>Safeguarded site allocation</p> | <p>Potential relationship in terms of traffic on the highway network, air quality and traffic noise Potential relationship in terms of socio economic and Human Health</p> |



| | | | |
|--|--|-----------------------------|---|
| Land to the West of Winwick Road and East of Wayfarers Drive, Newton-le-Willows. | Residential development Safeguarded Site Reference 5HS in the St Helens Local Plan | Safeguarded Site Allocation | Potential relationship in terms of traffic on the highway network, air quality and traffic noise Potential relationship in terms of socio economic and Human Health |
|--|--|-----------------------------|---|

If you have any queries regarding this, please do not hesitate to contact Stephen Gill via the details provided at the head of this letter.

Kind Regards,



Kieran Birch Head of Planning



ST HELENS
BOROUGH COUNCIL

Appendix I – Consultation Responses

Consultee Comments for Planning Application

EIA/2024/0001/SCOPE

Application Summary

Application Number: EIA/2024/0001/SCOPE

Address: Former Parkside Colliery Winwick Road Newton Le Willows St Helens

Proposal: Scoping Opinion from the Planning Inspectorate, on behalf of the Secretary of State, as to the scope and level of detail of the information to be provided within the Environmental Statement that will accompany its future application.

Case Officer: Mr Stephen Gill

Consultee Details

Name: Air Quality Officer

Address: Council Contact Centre, Wesley House, Corporation Street, St Helens WA10 1HF

Email: Not Available

On Behalf Of: EHO Air Quality

Comments

Stephen,

I have reviewed the air quality chapter of the scoping report for planning reference EIA/2024/0001/SCOPE.

Construction Dust

The scoping report discusses how construction dust will be assessed using the EPUK & IAQM Assessment of dust from demolition and construction (2024 guidance).

Operational Phase - Methodology

The AQ assessment will utilise ADMS Roads, a recognised air quality model for this type of assessment. The scoping report states that the air quality report will consider three scenarios in total. These consist of a baseline, a future year with the development scenario and a future year without the development scenario. The input data will use the appropriate traffic data. The report will also utilise an average background concentration from Defra background maps.

For the future air quality assessment, it is presumed an emission factor toolkit and model verification will be incorporated into the assessment to predict emission rates for the operational phase of the development.

The assessment will look into modelled the impacts of the increased traffic associated with the

development on the levels of the appropriate pollutants. A rail emissions assessment and combustion emissions are also to be included in the future air quality report. Human and ecological receptors will be included.

The modelled levels will be assessed against the Air Quality Target Values and the statutory air quality objectives set by the Air Quality (England) Regulations 2000.

No further air quality monitoring will be carried out as part of the assessment due to ample air quality monitoring data being readily available.

Mitigation Measures

After the air quality assessment, site specific mitigation measures (construction and operational) will be included and detailed at a later date.

Conclusion

I have no objections to the scoping report from an air quality perspective for St Helens.

Kind regards,

Emma Woodrow
Scientific Officer (Air Quality)

Stephen Gill

Subject: FW: Parkside East - Strategic Rail Freight

From: Rose Hames [REDACTED]@sthelens.gov.uk>

Sent: Friday, November 22, 2024 4:18 PM

To: Stephen Gill [REDACTED]@sthelens.gov.uk>

Subject: Re: Parkside East - Strategic Rail Freight

Hi Stephen,

Please find my feedback for waste and climate below:

Having read the EIA for Parkside Rail Freight Interchange I am satisfied that the environmental implications of waste have been considered, at this early stage, in relation to the SHMBC Local Plan. Given that the report highlights that there would be considerable quantities of material from excavation and demolition the minimisation of the generation of waste and the promotion of recycling would need to be considered further in the Site Waste and Material Management Plan (SWMMP). All operational waste from businesses with more than 10 employees, which is yet to be determined, will need to arrange separate food waste collections and separate dry mixed recycling streams (glass, paper and cardboard, plastic and metal) by the end of March 2025.

Having read the EIA I am satisfied that the climate change implications have been considered, although at a very early stage, in relation to the SHMBC Local Plan. There is a plan to include renewable/low carbon energy which is required under LPC13 and there are considerations for landscaping for climate resilience. More detailed energy consumption information will be required to satisfy LPC13. Further operational emissions data should be considered in the waste management plan and in relation to transport.

Many thanks,

Rose

Rose Hames

Environment & Climate Team Manager

Place Services

Environment Strategy & Change

Hardshaw Brook Depot | Parr Street | St.Helens | Merseyside | WA9 1JR

Email: [REDACTED]@sthelens.gov.uk Mob: [REDACTED]

Stephen Gill

Subject: FW: Parkside East - EIA Scoping Consultation

From: Ian Bond <[REDACTED]@growthlancashire.co.uk>
Sent: Thursday, November 21, 2024 2:17 PM
To: Stephen Gill <[REDACTED]@sthelens.gov.uk>
Cc: Joe Nanson <[REDACTED]@sthelens.gov.uk>; Kieran Birch <[REDACTED]@sthelens.gov.uk>
Subject: RE: Parkside East - EIA Scoping Consultation

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Stephen

I have read through the relevant parts of the EIA scoping consultation for Parkside East including Chapter 11 (Built Heritage).

I feel the methodology employed in the Chapter is sound and the choice for using a 1km study area is adequately explained in the scoping report. The buildings to be considered in the EIA (scoped in) appear to be correct and these which have been scoped out for further study.

I found the baseline study to be acceptable and a fair assessment and the likely impacts of the works moving forward addressed. Clearly the principal concern is the impact of the relocation of the Huskisson Memorial, however there are likely some public benefits achieved from its forced relocation, including a better public appreciation/understanding of the event and why there is a memorial to mark the event. The scoping report properly identifies that the impact will be discussed at length in the EIA.

Overall I find the chapter on heritage to be acceptable and I raise no further comments.

Ian Bond

Lead for Specialist Services

Growth Lancashire

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Stephen Gill

Subject: FW: Parkside East - EIA Scoping Consultation

From: planningpolicy@sthelens.gov.uk <planningpolicy@sthelens.gov.uk>

Sent: Friday, November 22, 2024 3:46 PM

To: Stephen Gill <[REDACTED]@sthelens.gov.uk>

Cc: Aimee Power <[REDACTED]@sthelens.gov.uk>; Sara Manson <[REDACTED]@sthelens.gov.uk>

Subject: Parkside East - EIA Scoping Consultation

Dear Steve

Thank you for consulting the Planning Policy team on the Parkside East EIA Scoping Consultation. Having reviewed the 'Request for an EIA scoping opinion' dated November 2024, we have the following comments to make:

Chapter 11 (Built Heritage) – Paragraph 11.35 makes reference to the list of locally important buildings provided by the Council being unadopted and unpublished. Whilst this is correct, and was the advice provided to the author of this section of the report, they were also made aware that the Council are currently working on updating the list, however no reference is made to this. Paragraph 11.36 references the list provided as being '*The St Helens local list*', with paragraph 11.15 setting out that there are 8 locally listed buildings within 1km radius of the site. However, there is no mention that there may be other buildings on the site / within the distance referenced (1km) that may be of local historical interest, and it should be noted that the list of buildings/structures detailed in the report may change upon adoption of the updated 'List of Locally Important Buildings' SPD (to be renamed 'Locally Listed Heritage Assets' SPD), which is anticipated to be early / mid-2025.

Chapter 17 (Socio-Economics) – We would suggest that St Helens Borough Council Social Value Policy is taken into account, along with the Local Economy Supplementary Planning Document (SPD). Additionally, the applicant should be aware that the Council are currently working on updating a number of it's SPDs, including updating the Local Economy SPD which will also include matters relating to social value. It is anticipated that this SPD will be adopted in early / mid-2025 and, depending on the timeframe for submission of the application, the current SPD may have been superseded and replaced by the updated SPD. In terms of the range of stakeholders to consult, we would also suggest that St Helens Way to Work team are also on the consultation list/register. St Helens Borough Council welcomes any opportunity to secure employment or apprenticeship opportunities for local residents during the construction or operational phases of the project. It should be noted that in paragraph 17.20 it is set out that based on the 2019 Indices of Multiple Deprivation St Helens Borough Council is ranked as 40th overall. This figure may need checking as our records show that it is lower at 26th. The demographic information as set out for St Helens is agreed.

Chapter 18 (Population and Human Health) – Agree with the information around population and health for St Helens.

Chapter 20 (Cumulative and in-combination effects) – It is noted that the zones of influence (ZOI) have been taken from advice provided by PINS. Advice should be sought from relevant consultees that such ZOIs are appropriate. Whilst acknowledging that Parkside West has been identified as a 'other development' to be considered for its potential in-combination effects, there are other sites identified in the local plan which we consider should also be considered (safeguarded sites 2ES (Land North East of Junction 23 M6, (South of Haydock racecourse), Haydock), 5HS (Land West of Winwick Road and South of Wayfarers Drive, Newton-le-Willows) and 4HS (Land East of Newlands Grange (former Vulcan works) and West of West Coast mainline, Newton-le-Willows)), along with any relevant allocations (or potential future allocations) within neighbouring authority areas.

Chapter 21 (Summary and next steps) – We consider that Table 21.1 (Preliminary Commitments Register) should also include the submission of a local employment scheme to encourage local employment in the development to promote local economic benefits.

General Matters – It is noted that some of the matters shown as being ‘scoped out’ (for example, the impact on wider societal infrastructure and resources within the Population and Human Health chapter) should potentially be ‘scoped in’, or at least further justification provided as to why they have been scoped out. This is to ensure that all relevant matters are fully considered relating to all relevant contexts rather than suggesting that they have been ‘scoped out’ as they would be considered in different chapters.

Should you require anything further from us, or need clarification on any of the points above, please do not hesitate to contact either myself or Sara.

Kind regards

Aimee

Aimee Power

Senior Planning Officer (Policy)

Development Plans Section | Development & Growth Division | Place Services Department | St Helens Council

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St Helens Council Environmental Health Division Planning Consultation Response - Contaminated Land Section

To: Stephen Gill

Date: 14th November 2024

From: Chris Culley

Tel: [REDACTED]

Planning App No: EIA/2024/0001/SCOPE

Proposals: Scoping Opinion from the Planning Inspectorate, on behalf of the Secretary of State, as to the scope and level of detail of the information to be provided within the Environmental Statement that will accompany its future application

Our Ref: 045668

Location: Former Parkside Colliery Winwick Road Newton Le Willows St Helens

Stephen,

Further to your consultation I have reviewed the following report submitted in support of the application;

- Intermodal Logistics Park North Ltd, ILT Strategic Rail Freight Interchange, Request for an EIA Scoping Opinion, ref. TR510001, November 2024

In particular, I have focused on reviewing chapter 14 of the report; Geology, Soils and Contaminated Land. The current pre-application is not supported by a contamination assessment but the EIA scoping opinion references a draft Phase 1 GeoEnvironmental Assessment that has been prepared for the site based on various sources of information including some preliminary ground investigations completed by Ramboll and Tier Consult. It is understood that the phase 1 report will be submitted as part of the Preliminary Environmental Information Report (PEIR) which will be subject to a period of consultation currently proposed for autumn 2025. It would have been helpful to have had sight of the draft phase 1 report in reviewing the scoping opinion as clearly this has informed the opinion set out in chapter 14. Notwithstanding this, through various records that are available to this department including historic OS mapping, geological maps, mining constraints mapping etc. it has been possible to corroborate much of the information referred to in section 14.

The site is comprised primarily of undeveloped agricultural land. Significant contamination issues are therefore not considered to be present however localised areas of made ground are anticipated to be present associated with the backfilling of historical ponds and in the vicinity of farm buildings, the M6 and the Chat Moss railway line. The scoping opinion advises that such areas will be targeted to understand the depth and extent of made ground

and any associated contamination issues in due course. The report also acknowledges that earthworks at the site and the associated reuse of soils would need to be facilitated by a materials management plan (MMP) under the CL:AIRE DoWCoP and that a construction environmental management plan (CEMP) would need to be developed and adhered to during the course of site enabling and construction.

The report sets out a series of criteria for assessing both the sensitivity of identified receptors and the magnitude of any impacts that might occur. I am in agreement with the criteria which I consider provide a sound basis for assessment.

Impacts that it is proposed be scoped into the assessment are as follows;

- Impacts on receptors from contamination and ground gas arising from the DCO site and nearby
- Loss of minerals resource
- Hydrogeological changes impacting upon Highfield Moss SSSI

As noted above, based on the site history I don't consider issues around contamination and ground gas to pose significant constraints. However, I have no objection to their proposed inclusion in the EIA.

With regards the impacts that are proposed to be scoped out, again I have no objection to the proposals as I would agree that the risks are either sufficiently low or that any potential impacts can be appropriately managed e.g. via a CEMP and a MMP.

I therefore confirm my agreement to the proposed scope of the EIA insofar as it relates to Geology Soils and Contamination.

Regards,

Chris Culley
Scientific Officer (Contaminated Land)



St. Helens Council

TOWN AND COUNTRY PLANNING ACT 1990

CONSULTATION ON APPLICATION

| | | |
|---|-----------------------------------|----------------|
| From: Michael Roberts – Countryside Development and Woodlands Officer | | |
| Tel: [REDACTED] | Email: [REDACTED]@sthelens.gov.uk | Date: 20/11/24 |

| | |
|---------------------|--|
| Application Number: | EIA/2024/0001/SCOPE |
| | Scoping Opinion from the Planning Inspectorate, on behalf of the Secretary of State, as to the scope and level of detail of the information to be provided within the Environmental Statement that will accompany its future application. Former Parkside Colliery Winwick Road Newton Le Willows St Helens |

I am reviewing the information submitted within this EIA Scoping Report in relation to Chapter 9 and 10:-

Chapter 9 Landscape and Visual Impact

The scope and methodology of the Landscape and Visual Impact Assessment (LIVIA) described in this chapter is in accordance with national guidance for the production of a LIVIA. The viewpoints identified are also acceptable and there is an indication that visual representations will be provided as we as an Illustrative Master Plan. The later is acceptable for an EIA though any full application will require fully specified landscape plans supported with a LEMP.

Chapter 10 Ecology and Biodiversity

MEAS will be able to respond in more detail to the information in this scoping report. From my own observations the methodologies, inclusion of data and information is comprehensive. It acknowledges the current position with BNG and takes the approach of acknowledging full compliance with the requirement of 10% BNG on site is likely from November 2025 and so sets a 10% BNG target.

In relation to both of the above sections I would advise that Arboricultural Implications Reports, including Tree Survey and Tree Constraints Plan are carried out as part of the EIA process as the outcome of these surveys would likely influence the outcomes and mitigation that may be identified as part of and LIVIA or Biodiversity Net Gain Assessments. Whilst strictly speaking not a requirement for the EIA (but is for any planning application made) it would be highly beneficial to include this within any report and help support the evidence base for any findings within the EIA.

Other requirements, such as fully specified landscape plans and Landscape and Ecological Management Plans would be required for a full planning application and not an EIA submission.

Michael Roberts

Countryside Development and Woodlands Officer

St Helens Council

Environmental Health Division

Planning Consultation

Response – Noise Section

To: Stephen Gill

Date: 20 November 2024

From: Niall Traynor

Planning App No: EIA/2024/0001/SCOPE

Proposals: Scoping Opinion from the Planning Inspectorate, on behalf of the Secretary of State, as to the scope and level of detail of the information to be provided within the Environmental Statement that will accompany its future application.

Our Ref:

Location: Former Parkside Colliery Winwick Road Newton Le Willows St Helens

Stephen,

A formal request has been received to provide a Scoping Opinion response for the development of the former Parkside Colliery, Newton-le-Willows. The scoping report provided proposes the scope of an Environmental Impact Assessment (EIA) to be submitted in support of the development of the Intermodal Logistics Park North.

The proposed scope of the EIA addresses the key areas of noise and vibration that are relevant for a development of this scale. Below is an analysis of the scoping report's approach.

Construction Phase

- **Noise and Vibration Sources**
The scoping report identifies noise and vibration sources, including site preparation, piling, and transportation. The commitment to assess these impacts using appropriate standards such as BS 5228 (noise and vibration control on construction sites) and BS 7385 (evaluation of vibration impact on buildings) is satisfactory.
- **Baseline Surveys**
The scope of the baseline surveys was previously agreed, and they were conducted between 9th September and 8th October. Baseline information is yet to be made available; therefore, I cannot provide any comment on the data.
- **Mitigation Measures**
The proposed inclusion of a Construction Environmental Management Plan (CEMP) to mitigate noise and vibration impacts is standard practice and acceptable.

Operational Phase

- **Noise and Vibration from Operations**

The scoping report identifies noise sources such as freight train movements, HGV traffic, and logistics activities. The use of BS 4142 (industrial and commercial sound assessment) and CRTN/DMRB methodologies for road noise impacts is acceptable and appropriate for this development.

- **Modeling and Assessment**

Noise modeling using industry-standard tools (e.g., CadnaA) is proposed to predict impacts at NSRs. This must include:

- Worst-case operational scenarios.
- Assessment of both daytime and nighttime impacts.
- Vibration effects from rail operations assessed in line with BS 6472 (evaluation of human exposure to vibration in buildings).

- **Mitigation Measures**

Commitments to consider acoustic barriers, layout design to minimise noise, and operational time restrictions are noted. However, detailed mitigation strategies must be included in the full EIA to ensure noise impacts are controlled effectively.

Considerations

The report does not explicitly discuss the assessment of low-frequency noise or ground borne vibration, which may arise from freight train operations. These aspects should be evaluated, particularly for sensitive receptors closest to the proposed railway.

Conclusion

The proposed scope of the EIA is acceptable and comprehensive and aligns with standard guidelines for noise and vibration assessment. Baseline studies, impact modeling, and proposed mitigation strategies provide a robust framework to address potential impacts.

| | | | |
|-----------------------|------------------------------|------------------------|---------------|
| Project: | St Helens Council DC Support | | |
| Our reference: | 415187-2992 | Your reference: | 771461 |
| Prepared by: | Beverley Price | Date: | 20.11.24 |
| Approved by: | Paul Walton | Checked by: | Richard Skitt |
| Subject: | EIA Scoping Opinion Request | | |

Application Number: EIA/2024/0001/SCOPE

For: EIA Scoping

Proposal: Scoping Opinion from the Planning Inspectorate, on behalf of the Secretary of State, as to the scope and level of detail of the information to be provided within the Environmental Statement that will accompany its future application.

Location: Former Parkside Colliery Winwick Road Newton Le Willows St Helens

Agent: Claire Deery Planning Inspectorate Environmental Services Operations Group 3 Temple Quay House 2 The Square Bristol BS1 6PN

Introduction

Mott MacDonald has been commissioned by St Helens Council to undertake a review of the Intermodal Logistics Park (ILP) North Strategic Rail Freight Interchange (SRFI) "Request for and EIA Scoping Opinion" report (RSO) dated October 2024, (Project reference TR510001).

The Intermodal Logistics Park North site, previously referred to as Parkside Phase 3, is a proposed Strategic Rail Freight Interchange (SRFI) on land allocated as part of the St Helens Local Plan to 2037.

This Technical Note has been produced in response to the supplied Intermodal Logistics Park (ILP) North Strategic Rail Freight Interchange (SRFI), EIA Scoping Request, Doc Ref: TR510001. Chapter 6 therein is the Transport Chapter, and this review has focussed on that.

Some of the advice contained within this Mott MacDonald technical note replicates prior advice given to St Helens Council in relation to early technical notes released by the site promoter on Trip Generation and high-level traffic modelling approach.

Development Proposals

There have been preliminary discussions to date in which further clarification of the proposals was requested, the RSO report now provides the following information about the proposals:

The Proposed Development is a Strategic Rail Freight Interchange (SRFI) and associated development comprising:

This document is issued for the party which commissioned it and for specific purposes connected with the above-captioned project only. It should not be relied upon by any other party or used for any other purpose.

We accept no responsibility for the consequences of this document being relied upon by any other party, or being used for any other purpose, or containing any error or omission which is due to an error or omission in data supplied to us by other parties.

This document contains confidential information and proprietary intellectual property. It should not be shown to other parties without consent from us and from the party which commissioned it.

- provision of a rail terminal serving up to 16 trains per day, including ancillary development such as container storage, cranes for the loading and unloading of shipping containers, Heavy Goods Vehicle (HGV) parking, rail control building and staff facilities
- a rail turn-back facility within the Western Rail Chord
- up to 687,500 square metres (m²) (gross internal area) of warehousing and ancillary buildings with a total footprint of 555,000m² and up to 137,500m² of mezzanine floorspace with the potential to be rail-connected, rail served and additional units
- potential for new road/pedestrian bridges across the Chat Moss Line,
- new road infrastructure and works to existing road infrastructure,
- provision of an overnight lorry park for users of the SRFI,
- new energy centre and electricity substations
- provision of photovoltaics¹⁰ and battery storage on site
- strategic landscaping and open space, including alterations to public rights of way and the creation of new ecological enhancement areas
- demolition of existing on-site structures (including existing residential dwellings / farmsteads and commercial premises)
- potential relocation of the Huskisson Memorial,
- earthworks to regrade the DCO Site to provide appropriate access, connections to the railway, development plots and landscape zones.

The Rail Terminal will have sidings long enough to allow freight trains up to 775m in length to be loaded and unloaded with hardstanding alongside for the movement of those vehicles involved in loading and unloading the containers. The Rail Terminal will be an open access facility, available to all logistics businesses to deliver and collect freight.

Access to the site will be from the M6 Junction 22 and Parkside Link Road and it is acknowledged that off site highway works may be required in addition to the new bridge over the railway lines, which will be constructed to provide access to the Rail Terminal from Parkside Road.

A new access to Newton Park Farm will also be provided, via the Parkside West development.

Car and cycle parking provision for freight and staff, including EV facilities, will be provided in accordance with parking standards. In addition, there will be overnight parking and facilities for HGV drivers connected with the rail terminal.

A supporting Transport Assessment will be provided which will include a detailed review of pedestrian and cycle facilities.

The proposed warehouse units would incorporate freight loading bays and would act as the transition point where the containerised loads arriving by train would be broken down for onward dispatch by road. There would be facilities for HGVs to manoeuvre and to park, in addition to parking for staff.

The development would be constructed in phases with warehousing included in the early phases, prior to the rail terminal becoming operational.

General

Agreements

With regards to the EIA Scoping Note, it states therein that a number of initial meetings have taken place with St Helens Council, and “St Helens Highways in agreement in principle” has been reached. It should be

noted that agreement with St Helens Council is never concluded until confirmation has been given directly from the Council to any advice provided via their consultant teams (Mott MacDonald included).

Manual for Streets

Reference is made in the EIA Scoping Report to use of Manual for Streets within the Transport Assessment approach. In broad principle, Mott MacDonald are a strong proponent of MfS and its aims, however we would suggest some hesitation in this instance given the logistics nature of the development proposals and the development location in question.

Vision and Validate

The EIA Scoping Report notes that a Vision and Validate approach will be adopted as part of the Transport Assessment. This is welcomed as being applicable and in accordance with the St Helens Transport & Travel 2024 Supplementary Planning Document.

It should be noted however that the validation of any scenario-based planning approach is heavily dependent upon the Active Travel and Sustainable Travel provisions, either committed or made as part of an application.

Scenarios that align with a pre-defined vision often require intervention into sustainable travel modes to make them a reality, and St Helens Council should be wary of an approach that is Vision and Validate in name only.

How variant scenarios align with sustainable travel schemes and their associated level of certainty, should be documented accordingly.

Infrastructure Delivery Plan

The EIA Scoping Report refers to infrastructure committed and conditioned against the prior PLR planning consent. Consideration and reference should also be given to the St Helens Infrastructure Delivery Plan, and where the delivery of the ILPN site has requirements in this regard.

Approach to Assessment

Preliminary discussions are ongoing involving Stantec, Tritax and St Helens Officers to agree the parameters of the Transport Assessment in addition, a framework Travel Plan and framework Construction Traffic Management Plan (CTMP) will also be produced.

The RSO advises that the Transport Assessment is to include the following sections:

- Introduction
- National, Regional, and Local Policy
- Existing Highway Conditions (SRN/local highway network and surrounding villages)
- Accessibility
- Development Proposal
- Transport Strategy
- Trip Generation and Distribution
- Traffic Impact Analysis
- Mitigation
- Summary and Conclusions

In addition to the above, the contents of the Transport Assessment and supporting transport submission should also be inclusive of the following in our view:

1. The Transport Strategy of the Transport Assessment should be aligned with Liverpool SuperPort aims.
2. There should be detailed description and plans of the overnight lorry park proposed to accommodate HGVs, particularly in relation to the parking provision, proposals for waste and access to welfare facilities for the drivers. Clarity should be given as to how early arrivals will be accommodated.
 - a. An HGV Management Plan would be required as part of the above, and the key technical aspects of that should follow the broad guide set in the St Helens Transport & Travel 2024 Supplementary Planning Document.
 - b. An HGV Routing Strategy is offered in the EIA Scoping Report, and this should ideally become part of the HGV Management Plan. Routing control in isolation is not enforceable, so needs to go hand-in-hand with wider signage, mitigation and operational controls.
3. Accessibility should be multi-modal and relate to the Minimum Accessibility Assessment requirements of the St Helens Transport & Travel 2024 Supplementary Planning Document.
4. Accessibility should be cognisant of two wider points, the St Helens and LCRCA Local Cycling & Walking Infrastructure Plans (LCWIP) and the proposed LCRCA Bus Franchising
5. Inputs to the Transport Assessment will be heavily reliant on traffic and transportation modelling work, and the associated documentation (Validation Report, Uncertainty Log, Forecasting Report, Model Performance and Scoping Reports) should be referenced and/or appended accordingly.
6. The Policy sections of the Transport Assessment should also be clear as to how appropriate Guidance documents have been utilised and adhered to.
7. It would be advisable in our opinion that Committed Development is given its own chapter within the Transport Assessment, with development phasing and build out rates being linked and reported as per the Uncertainty Log.

The RSO advises that the Framework Travel Plan is to include the following sections:

- Introduction
- Accessibility/baseline review
- Aims/objectives
- Mode shift target setting
- Measures and initiatives
- Programme of monitoring and review

Reference should be made to the St Helens Transport & Travel 2024 Supplementary Planning Document for guidance on Travel Plan expectations.

Site specific policy LPA09 of the St Helens Local Plan is clear that the ILPN site should establish and implement a Travel Plan that incorporates measures to encourage travel to / from the development using sustainable transport modes, including access by public transport, cycle and foot, in accordance with Policy LPA07.

Deliberate reference is made herein to Policy LPA07 (Infrastructure Delivery and Funding) in relation to Developer Contributions. This is noting that measures through the Travel Planning approach will likely need to be more than just 'soft' measures such as promoting car sharing. Commitments to Public Transport enhancement in both services and user ticketing, for example, will need to be considered.

Sustainable Travel Connections

A desire line from Newton le Willows to Parkside has been identified and focus should be given to how the development proposals can support this St Helens Council aspiration.

Public Transport connections to ST Helens town centre and/or other key destinations will need to be considered, as will cross-boundary provision.

Walk and cycle connectivity should always be afforded the same level of consideration as vehicular. Safety, Security, Suitability and the general Ambience of those routes need to be considered and enhanced where applicable.

Transport and Traffic Modelling

Trip Generation

It has been previously noted that the Parkside Link Road Highway Model (PLRHM) (previously referred to as the PLRTM – Parkside Link Road Traffic Model) is an appropriate basis for modelling work associated with the Proposed Development.

The ILPN RFI is expected to generate the following trip types:

- rail freight terminal
- HGV trips internal, external and Employee visitor trips
- Warehousing – LGV and HGV, internal and external trips, and employee/visitor trips (internal HGV and LGV trips will only occur once the rail freight terminal is operational)

Trip Generation for all the above types should be cognisant of the below points, which were previously included in a prior Mott MacDonald technical note on these ILPN proposals:

Availability of train paths on the wider network

- The Parkside Capacity study (Steer 2021 ref: 23978401) found there is rail network capacity for pathing to further locations for both the Ribble junction towards Preston and the Winsford South Junction towards Crewe. However, there is concern on the pathing through Manchester to access lines across the Pennines which will need to be addressed in further analysis. How the availability of train paths (volume of trains, origins/destinations, lengths, types of goods) around Parkside relates to the comparator sites proposed will be a key piece of analysis.

Expected number of trains per day serving each of the surveyed sites

- There should ideally be explicit detail on the expected /assumed number of trains per day. The previous site promoter proposal stated within the Parkside capacity assessment that there needs to be capacity for at least four trains per day, with the document also stating that the site will be capable of handling up to 20 trains per day. The number of trains per day will have a direct bearing on the road to rail, rail to road and the consequent road to road trip rates, and the equivalent information from the comparator sites needs to be understood to determine applicability for use in relation to Parkside.

Length and design of rail sidings at Parkside to accommodate ~700m+ lengths

- The National Policy Statement for National Networks 2015 states that where applicable an SRFI will need to be able to accommodate 775 metre trains. Clarification will be needed on the intended

design of the rail sidings and the capacity of trains to be accommodated. 700m+ trains have a significant bearing on the on-site infrastructure and layout as well as the road to rail and rail to road trip generation and associated mode shares. Again, this will need to be considered in the context of the comparator sites proposed in the Hydrock technical note.

Lights, HGVs and LGVs

- The summary trip rates provided are split solely by Lights and HGVs. Clarity would be needed on the differentiation between workforce and goods-based trips. The localised distribution of goods may generate light goods as well as heavy goods trips, on a range of classifications affecting PCU numbers etc.

Automation level of proposed units

- The automation level of proposed B2/B8 units at the proposed site will also have a bearing on the Trip Generation potential. Although this represents a level of detail beyond what is understood and available at this time, it does have a significant bearing on the level of job creation, type of workforce required, the distribution of trips associated with that workforce, as well as the turnover potential of the site at each unit/warehouse.

Future train path availability

- The future rail path availability and capacity is heavily influenced by proposed upgrades, routing changes, origin-destination pairings and capacity increases of the rail network. Northern Powerhouse Rail currently has variant options but is primarily a mixture of new-build high-speed line and upgrades to the existing lines. Although a fixed assessment will be required, it may vary dependent upon opening and forecast year assessments and what rail infrastructure could be classed as committed for each.

Rail served or rail linked

- It is noted and understood that warehouses operate differently dependent upon rail served or linked functionality. This principle will be inherent to the masterplan of the site and needs to be part of the comparative process against the other sites used to generate the proposed Trip Rates.

Peak hours

- An SRFI is a 24-hour operation, and peak hours of operation will not necessarily align with peak highway network hours. 0800-0900, 1700-1800 and 24 hour trip rates are presented at present. As a minimum, a breakdown by hour will be required, per vehicle type.
- Ultimately If rail<>road is a dominant factor in highway trip generation, then there may be working practices which can mitigate highway impacts, and these need to be part of the thinking.

SRFI operation

- Linkages with other Parkside B2/B8 Units, either Parkside East or West need to be understood. It needs to be further considered what bearing the SRFI (rail served or rail linked) will have on the non-rail linked/served elements of the wider Parkside East and West site.

It is also understood that comparator sites could be used to derive Trip Generation for the development proposals, this can be an acceptable approach subject to the following:

1. Consideration of the comparator sites in relation to the aforementioned points above
2. Clarity, that use of MEAN trip rates from comparator sites is a technique that has been used within the DCO process previously for this land use type, and

3. General applicability of the sites in relation to the Parkside geographic advantages (rail, motorway, major conurbations, train path availability, etc).

Trip Distribution

Trip Distribution analysis should be clear with regards to how any abstraction of demands may occur from the additional provision of rail freight, this may (or may not) be integrated into the forecast strategic modelling. This detail should be provided to ensure that all transport impacts are considered within the assessment.

The Trip Distribution methodology in the main, likely to involve use of bespoke Gravity Modelling, should be specified and documented in a Model Performance Report or otherwise.

Transport Impacts

We suggest that all likely transport impacts are defined within an Appraisal Specification Report (ASR) or equivalent such as a Model Performance Report, and definition of how they will be quantified provided.

The impacts should then be documented in the Transport Assessment.

This should include:

- Impact of abstraction of highway HGVs due to the introduction of an SRFI
- Impact of 'new' HGV trips related to the proposed SRFI
- Impact of 'new' light vehicle trips related to the proposed SRFI
- Impact of 'new' rail freight services and any subsequent impact to rail passengers

The EIA Scoping Report specifies the following operational/management measures and off-site highway improvement approaches.

- Construction Traffic Management Plan;
- Operational HGV Routing Strategy;
- Sustainable Transport Strategy;
- Framework Travel Plan;
- Pedestrian/cycle infrastructure upgrades;
- Public transport provision/upgrades;
- Junction capacity improvements;
- Traffic calming/safety measures; and
- Traffic management measures.

The above approaches are considered appropriate by Mott MacDonald although an HGV Management Plan should also be required.

Matrix Development

The specified approach to updating the trip matrices should be provided within the Strategic Modelling Approach or in the upcoming Model Performance Report. If existing base year demand matrices are to be used then it is critical that the 'prior matrices' are obtained, not the matrices that have gone through matrix estimation.

- The existing Parkside Traffic Model uses initial prior trip matrices, for each of the time periods and vehicle user classes, extracted as cordon matrices from the Warrington Multi-Modal Transport Model (WMMTM).

- Consideration will need to be given to whether the LCRTM, WMMTM or the TPS RTM2 is the most appropriate tool for prior matrix cordon in this instance, or if another approach should be adopted.
 - Mott MacDonald hold the view that the LCRTM provides an appropriate start point for prior matrix development although ‘infilling’ from other models or sources may be needed.

Rail and Demand Modelling

The need, or otherwise, for rail passenger modelling should be clarified at the earliest possible stage. Any specific reasons why this is not required should be agreed in early consultation. Alterations to the rail timetable may impact on passenger services so confirmation of how these impacts are to be minimal is recommended.

Similarly, it is understood that Variable Demand Modelling not perceived as being required. Mott MacDonald suggest that the best approach is to understand from prior equivalent DCO processes, whether or not VDM has been regularly required. The scale/scope of prior schemes can be used to aid determination VDM applicability in this instance.

We further understand that a simple mode choice model will be developed to aid the 2nd step of the Four Stage Modelling approach (Mode Split). This is considered valid subject to the contents of any Utility approach and the supporting datasets. These would need to be documented accordingly.

Data Requirements - Manual Classified Counts

The Manual Classified Counts MCC are defined within the EIA Scoping Report. Core junctions are identified, and clarity will be needed on which counts will be used in model calibration and which will be saved for validation.

Mott MacDonald understand that surveys have already been undertaken in October 2024, and as such the following points are replicated from prior advice given by Mott MacDonald to St Helens Council in relation to the ILPN proposals:

- Queue lengths are specified within the Data Collection Specification; this satisfies our previous query.
- In relation to temporal scope the times of 0600-2000 is consistent with our expectations and will give an understanding of the network peak periods and peak hours.
- It is stated that the MCC counts will be completed on a single day. Identification of major traffic disruption will need to be considered to validate the use of the MCC counts. This may require specific counts requiring further survey. We suggest that once the counts have been completed a record of any abnormal traffic conditions are recorded and considered within the model development alongside the ATC data. We note that there is planned roadworks at the end of October (25-28th of October-exact timing to be confirmed) at M6 Junction 22 related to the Parkside Link Road, if possible, counts in the vicinity of these roadworks should avoid the timing of these roadworks.
- It is noted that the Parkside Link Road will not be open before the counts are to be completed. This will need to be a focus of the Do Minimum model development ensuring that the network changes are in line with the as built information and zone connectors are reviewed to ensure that realistic rerouting of traffic is considered. We will expect this to be covered in the overall Model Validation report.
 - St Helens Council should retain the right to ask for additional surveys post opening of the PLR such that checks can be undertaken on the validity of forecast baseline operations.

It appears that Table 6.3 of the EIA Scoping Report which lists the core ATC links has been included twice, as both Table 6.2 and Table 6.3 are identical. The list of MCC locations is therefore not included. Figure 6.2

“Core MCC Locations” is provided however, which shows the St Helens locations identified in the table below.

We note that the numbering has been amended from that included within the prior Data Collection Specification document which has previously been reviewed, and that locations 101 and 102, originally included as “Optional” locations are now within the full list of survey sites. Locations are considered appropriate.

| Number | Location of MCC survey |
|---------------|--|
| 1 | A599 Penny Lane / Vista Road |
| 2 | A599 Peny Lane / A49 Lodge Lane |
| 3 | Haydock Island Interchange - West (excludes M6 mainline flows) |
| 4 | Haydock Island Interchange - East (excludes M6 mainline flows) |
| 25 | Mill Lane / Church St / Southworth St |
| 26 | Park Rd North / High Street |
| 27 | Golborne St / High Street |
| 28 | Acorn St / Park Rd North |
| 29 | High Street / Crow Lane East |
| 30 | A572 Crow Lane East / Victoria Road |
| 31 | Crow Lane West / Vista Road |
| 32 | Wargrave Rd / Victoria Rd |
| 33 | Acorn St / Wargrave Rd |
| 34 | Park Rd South / Wargrave Rd |
| 101 | Vicarage Rd / Stanley Bank Way |
| 102 | East Lancashire Rd / Liverpool Rd / Stanley Bank Way |

Data Requirements – Automated Traffic Counts

The Automatic Traffic Counts were originally defined within the prior Data Collection Specification note and now at Table 6.3 of the EIA Scoping Report. Mott MacDonald consider the scope of the ATCs to be sufficient.

As per TAG M1.2 we suggest that 95% confidence intervals for traffic counts should be calculated from the collected data. We also note as per TAG M1.2 “that splits between light and heavy obtained from ATCs on the basis of a 5.2m vehicle length have been shown to be subject to wide margins of error and should not be relied upon. The National Highways WebTRIS database is based on a 6.6m split, that is deemed more appropriate”.

We also suggest that the supplementary data proposed to be used within the model calibration / validation process are included in the full model specification alongside the proposed MCCs/ATCs, to ensure a full understanding as to how the base model will be updated.

The ATC surveys will include the following links within St Helens council boundary and are considered appropriate.

| Number | Location of ATC survey |
|--------|-------------------------------|
| A1 | A599 Penny Lane |
| A2 | A580 East Lancashire Road - 1 |
| A12 | A49 Mill Lane |
| A13 | B5209 Vista Road |
| A14 | A752 Crow Lane West |
| A15 | A572 Southworth Road |
| A21 | Wargrave Road |
| A108 | A56 Liverpool Road |
| A112 | Clipsey Lane |
| A113 | A752 Common Road |

Data Requirements Journey Time Surveys

The Journey Time data specification is defined within the EIA Scoping Report. Mott MacDonald consider the scope of the Journey Time Surveys to be sufficient, we do however have the following observations/ comments.

- The method of collection should be recorded alongside the expected sample size to ensure the confidence level is appropriate and in line with TAG guidance.
- Suggest where possible that the journey time routes are consistent to those used in the previous validation, notwithstanding where geographic extents of the model are to be updated.
- Source of Travel Time data (Tom Tom / INRIX, for example) should be specified.

EIA Transport Chapter Contents

It is stated in the EIA Scoping Report Transport Chapter that the EIA will assess the following topics as identified in the IEMA Guidance.

- Severance
- Driver Delay
- Pedestrian Delay
- Pedestrian Amenity
- Fear and Intimidation
- Accidents and Safety
- Climate change

These are considered appropriate by Mott MacDonald.



To: Planning Case Officer

From: Matthew Catherall (Internal Review)
Email: lfa-consultee@sthelens.gov.uk
Date Received: 07/11/2024
Date Submitted: 18/11/2024
Our Ref: LLFAC/EIA/2024/0001/SCOPE/01

RE: Application: **EIA/2024/0001/SCOPE**
Proposal: **Scoping Opinion from the Planning Inspectorate, on behalf of the Secretary of State, as to the scope and level of detail of the information to be provided within the Environmental Statement that will accompany its future application.**
For:
Location: **Former Parkside Colliery, Winwick Road, Newton Le Willows, St Helens**

Assessment Request:

Thank you for your consultation and seeking the views of the Lead Local Flood Authority (LLFA) on the above Scoping Opinion from the Planning Inspectorate. With the enactment of the Government Suds guidance dated 12/04/2015 the LLFA became a statutory consultee within the planning process. The above application was received on the 07/11/2024 and the assessment is based on data available provided on the Planning Portal dated the 18/11/2024.

Files assessed:

The file assessed as part of the scoping opinion is as follows:

- Intermodal Logistics Park North Ltd, ILT Strategic Rail Freight Interchange, Request for an EIA Scoping Opinion, ref. TR510001, November 2024

Policy and Guidance Assessment:

The review is focused on chapter 13 of the report; Hydrology and the LLFA is largely supportive of the information provided in the assessment and the array of baseline data requests needed for the development and scope of hydrological impacts and assets within the area of interest.

The area of interest is largely within the St Helens Council boundary administrative area, and we suggest the following policies below, of which all besides the Land Drainage Byelaws and Council adopted SuDS Guidance document have been previously identified in the report. The LLFA also welcome the inclusion of the neighbouring Local Authority flood and water related documentation and policies. It is envisioned that majority of the water will flow towards Warrington Council boundary, via Cockshot Brook and the positive drainage system implemented by the new highway network.

Relevant St Helens Council Local Plan Up to 2037 policies and Government Acts include:

- Local Plan Policy LPC12 Flood Risk and Water Management
- Sankey Catchment Action Plan
- Sustainable Drainage Systems (SuDS) 2020 Design and Technical Guidance
- Sustainable Drainage Systems (SuDS) 2020 Checklist
- St Helens Council Land Drainage Byelaws 2013
- Flood and Water Management Strategy 2020

The LLFA would advise that baseline data in support of water infiltration via Bre-365 infiltration testing is carried out, as part of any SuDS hierarchy assessment and that infiltration to ground is a preferred option. However, being close to the M6 Motorway and near water aquifers infiltration may be ruled out for other priorities and risks. The LLFA support the risk areas that have been scoped out of the document which include coastal, canal and reservoir flooding, however reference to why these areas have been scoped out should be identified with any supporting information.

The LLFA support the development of a Construction Environmental Management Plan (CEMP) to mitigate the risk of contaminants via the hydrologic process and also advise that phasing development plan is also included to reduce and manage the risk of surface water flow during construction and any temporary storm water storage areas.

The NPPF climate changes figures have now been superseded with higher values (45% is St Helens Council baseline) as shown in the government report (19th February 2019), link below. In terms of surface water discharge rate, the LLFA requests for a betterment of 50% reduction of existing surface water flow rates.

<https://www.gov.uk/guidance/flood-risk-assessments-climate-change-allowances>.

The Council advises that the St Helens Councils Sustainable Drainage Systems (SuDS) 2020 Design and Technical Guidance and associated checklist should be identified for the scoping opinion and aid in any future application and development. The Adopted SuDs document provides in full the requirements needed, below provides a generalised overview of the elements required in the assessment if this is useful to the planning inspectorate ad scoping opinion.

Detailed Desktop Study:

- Full Topographic Survey of the development site (base for plans submitted)
- Existing surface water flow routes / drains / sewers and watercourses
- Flood Risk from Rivers / Surface Water / Groundwater
- Geological and Soil types in the Area

Flood Risk Assessment:

- An appropriate site specific flood risk assessment where one is required, completed in line with the Environment Agency's guidelines and National Planning Policy Framework:
- Evidence of discussions with Service Utilities consultation has occurred

Drainage Strategy:

- Sustainable drainage proposals (SuDS Hierarchy)
- Outfall Locations
- Pre and Post Surface Water Discharge Rates (NPPF guidelines)
- On-site storage requirements / Attenuation and Drainage Calculations
- Maintenance Plan / Lifetime Management
- Maintenance Strategy / Phased construction development.
- Ground Investigation Work (variable based on drainage proposal)

Calculations and Drawings (legible, map key and scale, drawing details)

- Detailed design drawings including; details of inlets, outlets, and flow controls / long and cross section drawings of proposed drainage system(s), including design levels / details of appropriate water quality treatments;•Drainage system flow rates for the storm events 1 in 1 year; 1 in 2 year; 1 in 30 year and 1 in 100 year climate change (both pdf and electronic files showing all output data),
- Climate Change based on guidance by the government or local known flooding
- Urban Creep Assessment
- Storm Simulation Results and Reports

In conclusion the LLFA support agreement to the proposed scope of the EIA in relation to the hydrology section of the scoping opinion and provide recommendations for further specific documents and guidance.

Regards

Matthew Catherall

Principle Engineer Flood Risk (LLFA)

Merseyside Environmental Advisory Service
The Barn, Court Hey Park,
Roby Road, Huyton, L16 3NA
Director: Alan Jemmett, PhD, MBA

Enquiries: 0151 934 4951

Contact: Nicola Hayes
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DEVELOPMENT MANAGEMENT ADVICE

To: Stephen Gill
Organisation: Senior Planning Officer, St Helens Council

Your Ref: EIA/2024/0001/SCOPE
File Ref: DISC24-012
Date: 21st November 2024

From: Nicola Hayes
Contaminated Land Principal Officer

EIA Scoping Opinion from the Planning Inspectorate, on behalf of the Secretary of State, as to the scope and level of detail of the information to be provided within the Environmental Statement that will accompany its future application Former Parkside Colliery, Winwick Road, Newton Le Willows, St Helens.

1. Thank you for consulting Merseyside Environmental Advisory Service in respect of this EIA Scoping Opinion. The proposals comprise a **Strategic Rail Freight Interchange (SRFI)**.
2. Having reviewed the application and supporting documentation, our advice is set out below in two parts.
 - Part One deals with issues of regulatory compliance, action required **prior to determination** and matters to be dealt with through planning conditions. Advice is only included here where action is required or where a positive statement of compliance is necessary for statutory purposes.
 - Should the Council decide to adopt an alternative approach to MEAS Part 1 advice, I request that you let us know. MEAS may be able to provide further advice on options to manage risks in the determination of the application.
 - Part Two sets out guidance to facilitate the implementation of Part One advice and informative notes.

In this case Part One comprises paragraphs 3 to 50, whilst Part Two comprises paragraph 51.

Part One

3. An Environmental Impact Assessment (EIA) Scoping Report has been submitted (*Titax Big Box, October 2024*) in support of the Scoping Opinion request and this informs this response.

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4. The Environmental Statement that supports the planning application should include the following sections as a minimum:
 - A non-technical summary;
 - Detailed scope of works;
 - Reference to key plans and legislation. It is essential that all relevant guidance and policies be complied with as appropriate;
 - Detailed baseline review (associated with all development issues); and
 - Detailed integrated assessment of all environmental impacts. This assessment needs to take into account the nature of impact (importance, magnitude and duration – quantified as appropriate), reversibility of impact, mitigation, monitoring measures (including reference to long-term management and maintenance measures/plans) and residual impacts.
5. It is important that the conclusions of the environmental impact assessment are transparent and that all information used to draw conclusions is clearly presented and objective (including survey/assessment results) to enable third party verification.
6. The applicant is proposing to consult best practice guidance to assist in preparing the EIA methodology and Environmental Statement (ES) - and this is welcomed.

EIA Structure and Methodology

7. The proposed ES structure is satisfactory and in compliance with the EIA Regulations 2017.
8. The following Chapters are proposed to be included:
 - Transport
 - Air Quality
 - Noise and Vibration
 - Landscape and Visual Impact
 - Ecology and Biodiversity
 - Built Heritage
 - Archaeology
 - Hydrology
 - Geology, Soils and Contaminated Land
 - Materials and Waste
 - Energy and Climate Change
 - Socio-economics
 - Population and Human Health
 - Major Accident and Disasters
 - Cumulative and In-Combination Effects
9. The subject areas to be scoped in are satisfactory, although I will be guided by the relevant specialists as to the proposed scope of each chapter including which topic specific issues are to be scoped in and out.

Cumulative Impacts

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10. A separate chapter is proposed for cumulative effects covering both inter and intra-project effects. Information will be drawn from the individual topic considerations a consistent approach needs to be adopted to ensure that all cumulative effects are considered. The developments to be included within the inter cumulative impact should be agreed in advance with the Local Planning Authority
11. Specific comments on Ecology, Archaeology, Waste and Soil Resources are provided below.

Ecology

12. The development site is directly adjacent to Highfield Moss SSSI and is also near to the following designated sites:
 - Newton Lake and southern woodland LWS;
 - Willow Park LWS;
 - Gallows Croft LWS;
 - Newton Brook LWS;
 - Mesnes Park and Stream LWS; and
 - Castle Hill LWS.
13. The SSSI will be vulnerable to hydrological, lighting, recreational pressure and air quality changes and any future proposals will need to ensure harm to the SSSI is avoided. This is discussed further below.
14. None of the locally designated sites lie within the proposed development site boundary. However, the applicant should still consider how in-direct effects on these sites will be avoided, minimised and mitigated. If adverse effects cannot be avoided, options for compensation should be identified. Proposals should only be taken forward where the benefits of the development clearly outweigh the effects on habitats and species.
15. According to the LCR Ecological Network¹, part of the Knowsley and St Helens Mosslands Nature Improvement Area (NIA) falls within the DCO site (directly adjacent to the western boundary of Highfield Moss SSSI). Also, the LCR Ecological Network shows that habitats within the western rail chord (woodland, grassland and wetland habitats) are Core Biodiversity Area (CBA)². The proposed development should be designed to incorporate the NIA and CBAs and include avoidance measures to prevent harm. If the proposed protection measures are insufficient to prevent harm, then compensation may be required.
16. An ecological desktop study has been undertaken and the data sources used for this have been listed in paragraph 10.43 of the scoping report. However, I advise that the desktop study should also include the LCR Ecological Network for details of the NIA and CBAs.
17. Regarding the ecological surveys, not all of the site has been surveyed as yet. Further surveys, including of the western rail chord, are to take place in 2025.

¹ [Ecological Network Viewer](#)

² Comprising Priority and Local BAP Habitat



18. The following surveys were undertaken across accessible areas of the DCO site in 2024:
- UK Habitat Classification / Phase I ecological walkover (August 2024);
 - Badger survey (August 2024);
 - Bats - activity surveys (April-October 2024);
 - Bats - static detector deployments (April-October 2024);
 - Great Crested Newt eDNA surveys of off-site ponds (June 2024);
 - Breeding Bird surveys (April-July 2024); and
 - Wintering Bird surveys (October 2023-March 2024).
19. Paragraph 10.46 of the scoping report states that impacts to water vole and otter have been scoped out which is acceptable due to the absence of riparian habitat. It adds that the agricultural nature of the DCO site provides no opportunities for reptiles. However, railway line land falls within the DCO site boundary and it should therefore be considered whether this provides any suitability for reptiles.
20. The following surveys are planned across the entirety of the DCO site (and Highfield Moss SSSI) in 2025:
- Badger survey (2025);
 - Bats - activity surveys (2025);
 - Bats - static detector deployments (2025);
 - Bats - ground level tree assessments (2025);
 - Bats - aerial tree inspection of any trees to be either directly or indirectly affected and with bat roost potential (2025);
 - Bats - emergence of structures (buildings/bridges) to be directly or indirectly affected and with bat roost potential (2025);
 - Great Crested Newt eDNA surveys of off-site ponds (2025);
 - Breeding Bird surveys (2025); and
 - Wintering Bird surveys (2024-2025).
21. The proposed great crested newt (GCN) survey scope is to be extended to include all accessible ponds within a 250m radius of the DCO site which is acceptable. I advise that the DCO submission documents should include copies of the eDNA results from the testing laboratory for verification purposes.
22. Regarding breeding bird surveys, four walked transects were undertaken between the months of April to July across the accessible areas of the DCO site. This survey is to be extended across the entire site. The best practice guidance³ recommends that six survey visits are undertaken. If less than this is completed, then I advise that justification should be provided.
23. I advise that breeding bird survey should also include survey of any affected buildings and structures, by a licensed ecologist, for barn owl.

³ [Survey methodology | Bird Survey Guidelines](#)



24. For non-breeding birds, the scoping report states that six walked transects were undertaken. In the 2024-25 survey, I advise that the survey methodology is amended to also include vantage points, in addition to only walked transects.
25. The scoping report includes a preliminary assessment of potential effects. This includes disturbance and degradation to Highfield Moss SSSI and non-statutory designated sites.
26. It is considered unlikely that habitats within the site will be functionally-linked to internationally designated sites, such as the Mersey Estuary SPA and Ramsar. SPA and Ramsar sites on the Merseyside coast have not been referenced for inclusion in the assessment and this is accepted, subject to the results of the non-breeding bird surveys.
27. Regarding habitats, arable habitat has been scoped out due to its overall insignificance within the context of similar habitat locally. Again, this is accepted, subject to the results of the breeding and non-breeding bird surveys.
28. For the construction phase, the scoping report identifies habitat loss or gain as a result of the development as a potential effect, along with loss of ecological connectivity and fragmentation. This is also accepted as this stage.
29. The identified potential effects on species are also broad, although this is acceptable at this stage. The effects identified include disturbance and displacement of fauna from a change in normal conditions (light, noise, human activity) resulting in indirect loss of foraging and commuting habitat or resting and/or breeding sites and death and/or injury resulting from construction activities.
30. For the operational phase, impacts to Highfield Moss SSSI due to increased recreation use has been identified as a potential impact pathway.
31. Lack of management of habitats has been identified as a potential operational phase impact. Regarding protected and notable species, disturbance associated with maintenance of the proposed development, including the use of artificial lighting, increased noise and general habitat degradation has been identified as a potential impact and this is acceptable at this stage.
32. The scoping report then goes on to discuss potential avoidance and mitigation measures, although it notes that baseline information is still being gathered so the mitigation principles are broad and are to be refined.
33. In summary, the avoidance / mitigation principles identified for the construction phase include the following:
 - Implementation of a buffer zone between construction activities on the DCO Site and Highfield Moss SSSI, situated immediately adjacent to the northern boundary of the DCO site;
 - Preparation of a Construction Environmental Management Plan (CEMP) to incorporate measures to manage potential impacts on the neighbouring



SSSI arising from development activities and control/management of Himalayan balsam (Himalayan balsam was noted to be present along Parkside Road, and making up a portion of the understorey in the eastern area of the woodland on the DCO site);

- Design to include the retention of existing habitats of value on the DCO site (i.e. woodland, ponds, hedgerows, trees etc.) where possible, in line with development proposals; and
- Preparation of a Construction Environmental Management Plan (CEMP) containing measures to manage potential impacts on retained habitats arising from development activities

34. These outline principles are accepted at this stage. The scope of mitigation required for protected and notable species is to be determined on completion of the baseline surveys and this is accepted.

35. For the operational phase, the following avoidance / mitigation principles have been identified:

- Creation of a landscape buffer zone between the operational DCO Site and Highfield Moss SSSI in order to avoid and/or mitigate any potential impacts to the hydrological regime of the SSSI and avoid direct impacts on fauna/flora associated with the SSSI;
- Provision of greenspace areas within the Proposed Development footprint as an attractive option for the DCO Site workers to utilise as an alternative to the SSSI, therefore reducing recreational impacts on the SSSI;
- Input into an illustrative landscape masterplan and completion of a BNG assessment to ensure the DCO Site proposals deliver a measurable net gain in biodiversity;
- Preparation of a Landscape and Ecological Management Plan (LEMP) containing measures to ensure newly created habitats reach the required conditions set out in the BNG assessment, and retained habitats are managed to not degrade over time;
- Preparation of a Landscape and Ecological Management Plan (LEMP) containing measures to ensure opportunities for protected species groups are retained and enhanced within the DCO Site long-term; and
- The DCO Site layout and design to, where possible, retain sensitive ecological features of importance to protected species groups (i.e. retain dark corridors along the DCO Site boundaries to maintain opportunities for foraging/commuting bats).

36. The broad operational avoidance / mitigations measures identified are acceptable at this stage.

37. The ecology section of the scoping report ends with a summary table of the proposed EIA scope (Table 10.2). This lists ecological receptors and whether they are to be scoped in or out of the EIA. Construction phase impacts to locally designated sites have been scoped in for further assessment, but adverse impacts are considered unlikely due to the separating distance and lack of potential impact pathways. This is accepted.



38. Reptiles have been scoped out and, as indicated above, this may need further consideration. Impacts to the NIA and CBA will also need to be considered.
39. The EclA methodology should follow best practice guidelines⁴.
40. Cumulative and in-combination effects are considered in section 20 of the scoping report. Regarding zone of influences (ZOI) to be employed in the assessment of cumulative effects, it states that the ecology assessment will be focussed on local sites and protected species and the ZOI will take into account cumulative schemes within 2km of the DCO site. A ZOI of 10km from the DCO site will be used for internationally designated sites. This is acceptable. The significant projects already identified for the cumulative assessment include Parkside Phase 1 and 2.
41. I welcome that a Biodiversity Net Gain (BNG) Assessment is to be undertaken, even though it will not be mandatory for NSIPs until November 2025. The MEAS guidance note on BNG⁵ will assist the applicant with their assessment, particularly with matters such as strategic significance prior to the adoption of the LNRS. At the time of writing, there is not a large number of off-site options for achieving BNG that are available locally. The applicant should therefore seek to follow the Biodiversity Gain Hierarchy and retain as much of the existing habitat as possible in the first instance. The information that the applicant should submit in relation to BNG is given in Part Two below.

Archaeology

42. Archaeology is considered within Chapter 12 of the Scoping Report (by Icen Projects). This has been prepared without having consulted all relevant Historic Environment Records: the area immediately to the south of the DCO is in Warrington Borough and this is covered by Cheshire Historic Environment Record (cf. section 12.13).
43. As not all HERs have been consulted in the proposed study area this has led to some fundamental errors in the baseline assessment (e.g. 12.14 bullet point three states that there is only one Scheduled Monument within 1km of the DCO site but there are two more to the south) and has meant that the character of the surrounding area has not been fully appreciated (e.g. ChER contains records in the wider area for more barrows, a Romano-British farmstead and the extensive early medieval Christian cemetery at Southworth Hall Farm).
44. The incomplete baseline notwithstanding, the Scoping Report's conclusions regarding archaeology are broadly correct and acceptable, i.e. that archaeology should be scoped in and addressed in the ES via a chapter informed by a desk-based assessment (though note Cheshire Historic Environment Record should appear in section 12.17 of the Scoping Report and must be consulted when the DBA is produced).

⁴ [CIEEM EclA Guidelines](#)

⁵ [MEAS BNG Guidance Note](#)



45. The need for and scope of subsequent archaeological evaluation will be agreed following production of the DBA and discussion with the MEAS Planning Archaeologist.

Waste

46. Waste is to be scoped in and further details of this is provided within Chapter 15 Waste and Materials. The Chapter details National and Local Planning Policy and references the Joint Waste Local Plan for Merseyside and Halton (JMWP) which is welcomed. The applicant intends to follow the waste hierarchy and a Site Waste Management and Materials Plan (SWMMP) will be prepared in conjunction with a Construction Environmental Management Plan (CEMP) and submitted with the application.
47. Section 15.82 states that the cut and fill/earthworks strategy will aim to achieve a balance. If this is unachievable then receiver sites will be found with the reuse of soil facilitated under the Site Waste Management Plan and a Materials Management Plan. If significant material is to be imported or exported to facilitate development this may need to be considered within the associated topic Chapters such as Transport and Air Quality.
48. The proposed approach outlined within the Chapter is acceptable.

Land Use and Soil Resources

49. There is limited discussion on land use specifically the loss of agricultural land including as a soil resource. Chapter 10.74 (Ecology and Biodiversity) states that arable habitat has been scoped out of the assessment from an ecological perspective (owing to its overall insignificance within the context of similar habitat locally), but that an agricultural land classification (ALC) assessment will be undertaken and submitted as part of the DCO application. Within the Geology, Soil and Contaminated Land Chapter 14 Table 14.3 *Summary of Geology, Soils and Contaminated Land impacts proposed to be scoped in and out of the EIA* states that the impacts on the loss of soils as a resource will be scoped out as these will be managed through embedded mitigation through the production of a CEMP and MMP.
50. I advise that further assessment of the loss of agricultural land is required. This represents a significant soil resource as well as carbon storage and needs to be considered within the relevant Chapters. A separate Soil Resource Plan should be considered.

Part Two

51. In order to assist the consideration of biodiversity net gain as part of the determination of the application, I advise that the following information should be submitted in support of the DCO application:
- UKHAB habitat survey of the current pre-development habitat;
 - Completed Statutory Defra Metric showing both pre-development habitats and proposed post-construction habitats. This should be submitted with macros disabled, and all sheets unhidden;



- Accompanying habitat condition assessments must be submitted for the existing pre-development habitats and proposed condition of newly created or enhanced habitats (If using the small sites metric condition assessment sheets are not required);
- GIS layers of pre-development baseline and post-development baseline;
- Evidence that the mitigation hierarchy and biodiversity gain hierarchy have been followed;
- Landscape masterplan showing on site habitat provision; and
- Details of any proposed offsite provision (e.g. use of habitat bank, provision of own offsite, use of national credits); and
- A draft habitat management and monitoring plan for any proposed habitats that are considered significant on-site gains (this should follow the Habitat management and monitoring plan template⁶).

Further advice on Biodiversity Net Gain requirements for the Liverpool City Region can be found in the MEAS BNG Guidance Note.

https://eas.merseysidebiobank.org.uk/wp-content/uploads/2024/03/LCR_Mandatory_BNG_Guidance_Note_FINAL.pdf

I would be pleased to discuss these issues further and to provide additional information in respect of any of the matters raised.

Nicola Hayes
Contaminated Land Principal Officer

⁶ [NE HMMP Template](#)





UK Health
Security
Agency

Environmental Hazards and Emergencies Department
Seaton House, City Link
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nsipconsultations@ukhsa.gov.uk
www.gov.uk/ukhsa

Your Ref: TR0510001
Our Ref: 91332 CIRIS

Ms Claire Deery
Senior EIA Advisor
The Planning Inspectorate
Temple Quay House
2 The Square
Bristol, BS1 6PN

3rd December 2024

Dear Ms Deery

**Nationally Significant Infrastructure Project
Intermodal Logistics Park North TR0510001
Scoping Consultation Stage**

Thank you for including the UK Health Security Agency (UKHSA) in the scoping consultation phase of the above application. ***Please note that we request views from the Office for Health Improvement and Disparities (OHID) and the response provided below is sent on behalf of both UKHSA and OHID.*** The response is impartial and independent.

The health of an individual or a population is the result of a complex interaction of a wide range of different determinants of health, from an individual's genetic make-up to lifestyles and behaviours, and the communities, local economy, built and natural environments to global ecosystem trends. All developments will have some effect on the determinants of health, which in turn will influence the health and wellbeing of the general population, vulnerable groups and individual people. Although assessing impacts on health beyond direct effects from for example emissions to air or road traffic incidents is complex, there is a need to ensure a proportionate assessment focused on an application's significant effects.

Having considered the submitted scoping report we wish to make the following specific comments and recommendations:

Environmental Public Health

We recognise the promoter's proposal to include a health section. We believe the summation of relevant issues into a specific section of the report provides a focus which ensures that public health is given adequate consideration. The section should summarise key information, risk assessments, proposed mitigation measures, conclusions and residual impacts, relating to human health. Compliance with the requirements of National Policy Statements and relevant guidance and standards should also be highlighted.

In terms of the level of detail to be included in an Environmental Statement (ES), we recognise that the differing nature of projects is such that their impacts will vary. UKHSA and OHID's predecessor organisation Public Health England produced an advice document *Advice on the content of Environmental Statements accompanying an application under the NSIP Regime*¹, setting out aspects to be addressed within the Environmental Statement¹. This advice document and its recommendations are still valid and should be considered when preparing an ES. Please note that where impacts relating to health and/or further assessments are scoped out, promoters should fully explain and justify this within the submitted documentation.

Recommendation

Our position is that pollutants associated with road traffic or combustion, particularly particulate matter and oxides of nitrogen are non-threshold; i.e., an exposed population is likely to be subject to potential harm at any level and that reducing public exposure to non-threshold pollutants (such as particulate matter and nitrogen dioxide) below air quality standards will have potential public health benefits. We support approaches which minimise or mitigate public exposure to non-threshold air pollutants, address inequalities (in exposure) and maximise co-benefits (such as physical exercise). We encourage their consideration during development design, environmental and health impact assessment, and development consent.

The applicant has referenced in the Air Quality Assessment that there is an Interim Target of 12 µg/m³ for particulate matter 2.5 (PM_{2.5}) to be achieved by the end of January 2028. This is prior to a proposed maximum concentration target value of 10µg/m³ which is due to come into effect across England by 2040. Given the longevity of the scheme it is recommended that the applicant should consider mitigations to facilitate the Development meeting the 2040 target which is likely to be within the Development's operation phase. In addition, there is a 2040 target for a population exposure reduction target (PERT) of 35% compared with 2018. The interim target for this is a reduction of at least 22% by the end of January 2028.

¹
<https://khub.net/documents/135939561/390856715/Advice+on+the+content+of+environmental+statements+accompanying+an+application+under+the+Nationally+Significant+Infrastructure+Planning+Regime.pdf/a86b5521-46cc-98e4-4cad-f81a6c58f2e2?t=1615998516658>

Interim Planning Guidance issued by Defra² states that the new approach for consideration of PM_{2.5} targets moves away from a requirement to assess solely whether a scheme is likely to lead to an exceedance of a legal limit and instead ensures that appropriate mitigation measures are implemented from the design stage, streamlining the process for planning and ensuring the minimum amount of pollution is emitted and that exposure is minimised. Pending publication of the new guidance, applicants are advised to provide evidence in their planning applications that they have identified key sources of air pollution within their schemes and taken appropriate action to minimise emissions of PM_{2.5} and its precursors as far as is reasonably practicable. This applies to all developments which would normally require an air quality assessment.

Reference is made to consideration of vehicle exhaust emissions. It is UKHSA's position that all vehicle emissions, including those from brake and tyre wear, should be included in any assessment.

Noise

On matters related to noise and public health, UKHSA has recommendations regarding the content of the following sections, detail on which is provided in Appendix A.

- Significance of Impacts
- Health Outcomes
- Identification and Consideration of Receptors
- Baseline Sound Environment
- Mitigation
- Green Spaces and Private Amenity Areas
- Step-changes in Noise Exposure and the Change-effect
- Community Engagement and Consultation Feedback

Yours sincerely,

On behalf of UK Health Security Agency

Please mark any correspondence for the attention of National Infrastructure Planning Administration.

² <https://uk-air.defra.gov.uk/pm25targets/planning>

Appendix A

Background

This response is in relation to an application by Intermodal Logistics Park North Limited (the Applicant) for an EIA scoping opinion for Intermodal Logistics Park (ILP) North Strategic Rail Freight Interchange (SRFI) Project reference TR510001.

The Applicant put forward proposals for a new SRFI and associated development on land to the east of Newton-le-Willows, in the jurisdictions of St Helens and Wigan Councils. A SRFI is a large multipurpose freight interchange and distribution centre linked into both the rail and trunk road systems. SRFIs reduce the cost of moving freight by rail and encourage the transfer of freight from road to rail.

As a rail freight terminal / intermodal facility, possible noise sources include:

- Road traffic including heavy goods vehicle traffic to and from the site
- Rail freight traffic
- Operational activities within the facility

Guiding principles for this scoping response

Environmental noise can cause stress and sleep disturbance, which over the long term can lead to a number of adverse health outcomes ^[1-4].

The Noise Policy Statement for England (NPSE) ^[3] sets out the government's overall policy on noise. Its aims are to:

- avoid significant adverse impacts on health and quality of life;
- mitigate and minimise adverse impacts on health and quality of life; and
- contribute to the improvement of health and quality of life.

These aims should be applied within a broader context of sustainable development ^[5], where noise is considered alongside other economic, social and environmental factors. UKHSA expects such factors may include:

- Ensuring healthy lives and promoting well-being for all at all ages;
- promoting sustained, inclusive and sustainable economic growth, full and productive employment and decent work for all;
- building resilient infrastructure, promoting inclusive and sustainable industrialisation and fostering innovation;
- reducing inequality; and
- making cities and human settlements inclusive, safe, resilient and sustainable.

UKHSA's consideration of the effects of health and quality and life attributable to noise is guided by the recommendations in the Environmental Noise Guidelines for the European Region 2018 published by the World Health Organization ^[1], and informed by high quality systematic reviews of the scientific evidence ^[2, 6, 7]. In 2023 UKHSA and the University of

Leicester published a spatial assessment of the attributable burden of disease due to transportation noise in England [4]. The scientific evidence on noise and health is rapidly developing, and UKHSA's recommendations are also informed by relevant studies that are judged to be scientifically robust and consistent with the overall body of evidence.

UKHSA believes that Nationally Significant Infrastructure Projects (NSIP) should not only limit significant adverse effects, but also explore opportunities to improve the health and quality of life of local communities and achieve more equitable health outcomes.

UKHSA also recognises the developing body of evidence showing that areas of tranquillity offer opportunities for health benefits through psychological restoration. NSIP applications need to demonstrate that they have given due consideration to the protection of the existing sound environment in these areas.

Significance of Impacts

Determining significance of impacts is an essential element of an Environmental Impact Assessment, and therefore significance needs to be clearly defined at the earliest opportunity by the Applicant. UKHSA recommends that the definition of significance is discussed and agreed with relevant stakeholders, including local authority environmental health and public health teams and local community representatives, through a documented consultation process. UKHSA recommends that any disagreement amongst stakeholders on the methodology for defining significance is acknowledged in the planning application documentation and could inform additional sensitivity analyses. For noise exposure, UKHSA expects assessments of significance to be closely linked to the associated impacts on health and quality of life in line with the NPSE [3], and not on noise exposure per se.

For road traffic noise, the Design Manual for Roads and Bridges (DMRB) Table 3.49 LA111 [8] includes proposed values for the Lowest Observable Adverse Effect Level (LOAEL) and Significant Observable Adverse Effect Level (SOAEL)³ for operational noise, and these values are likely to inform judgements on significance of impact. Whilst DMRB does not explicitly reference the underpinning evidence that informed these numbers, the night time LOAEL and SOAEL of 40 dB L_{night} (outside, free-field) and 55 dB L_{night} (outside, free-field) respectively, correspond to the guideline value and interim target proposed in the WHO Night Noise Guidelines 2009 [10]. The Night Noise Guidelines emphasised that the interim target was “not a health-based limit value by itself. Vulnerable groups cannot be protected at this level”. The daytime SOAEL of 68 dB $L_{A10,18\text{hr}}$ (façade) appears to be derived from the relative noise level in the Noise Insulation Regulations (NIR) [11], which is linked to the provision of enhanced noise insulation for new highway infrastructure. The NIR does not explicitly refer to the underpinning evidence on which the relevant noise level is based, and there is a lack of good quality evidence linking noise exposure expressed in the L_{A10} metric to health effects. Therefore, it is helpful to convert these levels to L_{den} and $L_{\text{Aeq},16\text{hr}}$ metrics, which are more widely used in the noise and health literature. Assuming motorway traffic, a

³ As defined in the Noise Policy Statement for England [3] and the Planning Practice Guidance [9].

level of 68 dB $L_{A10,18hr}$ (façade) is approximately equivalent to⁴ free-field outdoor levels of 69dB L_{den} (or⁵ 64 $L_{Aeq,16hr}$).

With reference to the noise exposure hierarchy table in the Planning Practice Guidance (Noise) ^[9], UKHSA is not aware of good quality scientific evidence that links specific noise levels to behavioural/attitudinal changes in the general population. Reactions to noise at an individual level are strongly confounded by personal, situational and environmental non-acoustic factors ^[16, 17], and large inter-personal variations are observed in the reaction of a population to a particular noise level ^[18-21]. For these reasons UKHSA is not able to provide evidence-based general recommendations for SOAELs that are able to achieve the aims and objectives of the Noise Policy Statement for England and the Planning Practice Guidance on noise. DMRB allows for project specific LOAELs and SOAELs to be defined if necessary, and UKHSA recommends that the Applicant gives careful consideration of the following:

- i. The existing noise exposure of affected communities, including consideration of any designated Noise Important Areas identified in proximity to the scheme;
- ii. The size of the population affected – for example an effect may be deemed significant if a large number of people are exposed to a relatively small noise change;
- iii. The relative change in number and type of road vehicle pass-bys;
- iv. The relative change in number and type of rolling stock movements;
- v. Changes in the temporal distribution of noise during day/evening/night, or between weekdays and weekends;
- vi. Soundscape and tranquillity, in particular the value that communities put on the lack of environmental noise in their area, or conversely, on the lack of public areas within walking distance that are relatively free from environmental noise;
- vii. Opportunities for respite (predictable periods of relief from noise), either spatially or temporally;
- viii. Cumulative exposure to other environmental risk factors, including other sources of noise and air pollution,
- ix. Local health needs, sensitivities and objectives.

Part 8.39 of the scoping report considers the assessment of noise from road and rail traffic and operational noise. Noise from road and rail traffic can be assessed against the evidence in the WHO 2018 Environmental Noise Guidelines and more recent evidence.

The EIA scoping opinion includes tables of suggested LOAELs and SOAELs including: Table 8.2 for construction, 8.3 for road traffic noise and table 8.6 for railway noise. UKHSA recommends that the Applicant justifies the chosen LOAELs and SOAELs.

For operational noise, section 8.91 of the scoping report states it will be assessed using British Standard (BS) 4142:2014+A1:2019, (BS 4142). UKHSA expects this will include an assessment of noise from fixed plant. BS4142 assesses the significance of the sound by

⁴ Using equation 4.16 from ^[12], assuming free-field levels; $L_{A10,18hr}$ (free-field) = $L_{A10,18hr}$ (façade) – 2.5dB(A) as per CRTN ^[13].

⁵ Using conversion factors in para. 2.2.13 Transport Analysis Guidance (TAG) Unit A3 ^[14].

rating the sound source compared to the background sound level. It does not assess health impacts. The applicant will need to establish a rationale for the chosen SOAEL etc and how these relate to impacts on health and quality of life.

For construction noise the latest revision of the DMRB makes reference to Section E3.2 and Table E.1 in Annex E (informative) of BS 5228-1:2009+A1:2014 ^[22] for the definition of SOAELs. Table E.1 of BS 5228-1:2009+A1:2014 provides examples of threshold values in three categories, based on existing ambient values. Threshold values are higher when ambient noise levels are higher. Daytime (07:00-19:00, weekdays) thresholds can be traced back to principles promoted by the Wilson Committee in 1963 ^[23]: “Noise from construction and demolition sites should not exceed the level at which conversation in the nearest building would be difficult with the windows shut”. The Wilson Committee also recommended that “Noisy work likely to cause annoyance locally should not be permitted between 22.00 hours and 07.00 hours”. BS 5228 states that these principles have been expanded over time to include a suite of noise levels covering the whole day/week period taking into account the varying sensitivities through these periods.

Health Outcomes

UKHSA encourages the applicant to present population noise exposure data in terms of the L_{den} metric (in addition to L_{eq} and L_{10}), to facilitate interpretation by a broad range of stakeholders. This is because most recent scientific evidence on the health effects of environmental noise is presented in terms of L_{den} ^[1, 6, 7]. UKHSA believes that quantifying the health impacts associated with noise exposure and presenting them in health-based metrics allows decision makers to make more informed decisions.

Reference should be made to the Public Health Outcomes Framework (PHOF) indicators for daytime noise (B14b) and night-time noise (B14c) and include a calculation of the impact of the scheme on these indicators ^[24].

For transportation sources, UKHSA recommends the quantification of health outcomes using the methodology agreed by the Interdepartmental Group on Costs and Benefits - Noise subgroup [IGCB(N) ^[25] (currently under review), and more recent systematic reviews ^[1, 6, 7]. For road noise UKHSA believes there is sufficient evidence to quantify the following health outcomes: long-term annoyance, sleep disturbance, ischaemic heart disease (IHD), and potentially stroke⁶ and diabetes⁷. For rail noise UKHSA believes there is sufficient evidence to quantify the following health outcomes: long-term annoyance and sleep disturbance⁷. Effects can be expressed in terms of number of people affected, number of disease cases, and Disability Adjusted Life Years (DALYs). The IGCB(N) guidance ^[25] can also be used to translate these effects into monetary terms.

⁶ A literature review commissioned by Defra ^[7] identified nine longitudinal studies on road traffic noise and incidence of stroke, and eight longitudinal studies on road traffic noise and stroke mortality.

⁷ A literature review commissioned by Defra ^[7] identified four longitudinal studies on road traffic noise and incidence of diabetes.

Some health outcomes, namely annoyance and self-reported sleep disturbance, can be influenced by the local context and situation. In these cases, it would be preferable to use exposure-response functions (ERFs) / exposure-response relationships (ERRs) derived in a local context. However, UKHSA is not aware of any ERFs / ERRs for road or railway traffic being available for a UK context from data gathered in the last two decades. Therefore, in UKHSA's view the ERFs presented in the WHO-commissioned systematic reviews and the UKHSA update in 2022 offer a good foundation for appraisal of the health effects associated with road and rail traffic noise [2, 26]. For metabolic outcomes, no ERF was published in the WHO ENG 2018 [1]. A recent meta-analysis of five cohort studies of road traffic noise and incidence of diabetes was reported [27] by both Vienneau et al. in 2019 and UKHSA in 2023 [4].

Where schemes have the potential to impact many people, UKHSA expects the Applicant to carry out literature scoping reviews to ensure that the most robust and up-to-date scientific evidence is being used to quantify adverse effects attributable to the scheme.

UKHSA expects to see a clear and transparent methodology how the Applicant will take into consideration effects on health and quality of life when making judgement of significance, including a description of local circumstances and modifiers anticipated, and how reasonably foreseeable changes in these circumstances will be dealt with during the assessment process.

Identification and Consideration of Receptors

The identification of noise sensitive receptors in proximity to the proposed scheme, or route options if relevant, is essential in providing a full assessment of potential impacts. Examples of noise sensitive receptors include but are not limited to:

- i. Noise Important Areas
- ii. Residential areas
- iii. Schools, hospitals and care homes
- iv. Community green and blue spaces and areas valued for their tranquillity, such as local and national parks
- v. Public Rights of Way (PRoWs)

Noise Important Areas (NIAs) are areas with the highest levels of noise exposure at a national level and as such require very careful consideration in terms of protection from increased noise levels as well as opportunities for noise mitigation that can lead to an improvement in health and quality of life. For road traffic, DMRB requires a list of noise mitigation measures that the project will deliver in Noise Important Areas. UKHSA supports this requirement, which can be equally applied to railway noise. New infrastructure development should offer an opportunity to reduce the health burden of existing transport infrastructure, particularly for those worst affected. UKHSA would encourage this approach to extend beyond NIAs, in line with the third aim of NPSE [3].

Table 20.1 of the Scoping Report suggests the limits of the zone of influence (ZOI). To ensure the identification of all relevant noise-sensitive receptors, the limits of the ZOI will need to be justified.

Baseline Sound Environment

The greater the understanding of the baseline sound environment, the greater the potential for the assessment to reflect the nature and scale of potential impacts, adverse or beneficial, associated with the scheme. UKHSA recommends that traditional averaged noise levels are supplemented by a qualitative characterisation of the sound environment, including any particularly valued characteristics (for example, tranquillity) and the types of sources contributing to it [28].

UKHSA recommends that baseline noise surveys are carried out to provide a reliable depiction of local diurnal noise variations for both weekdays and weekends, in a variety of locations, including the difference between day (07:00-19:00), evening (19:00-23:00) and night-time (23:00-07:00) periods. This is particularly important if there are areas within the scheme assessment boundary with atypical traffic day/evening/night distributions. Achieving these aims is likely to require long-term noise monitoring in multiple locations for a period greater than seven days. This information should be used to test the robustness of any conversions between noise metrics (e.g., converting from $L_{A10,18hr}$ to $L_{Aeq,2300-0700}$ and L_{den}).

UKHSA suggests that a variety of metrics can be used to describe the sound environment with and without the scheme—for example, L_{den} and L_{night} used in the WHO Guidelines 2018 [1], levels averaged over finer time periods, background noise levels expressed as percentiles, and number of event metrics (e.g., N65 day, N60 night)—and that, where possible, this suite of metrics is used to inform judgements of significance. There is emerging evidence that intermittency metrics can have an additional predictive value over traditional long-term time-averaged metrics for road traffic noise [29].

Mitigation

UKHSA expects decisions regarding noise mitigation measures to be underpinned by good quality evidence, in particular whether mitigation measures are proven to reduce adverse impacts on health and quality of life. For interventions where evidence is weak or lacking, UKHSA expects a proposed strategy for monitoring and evaluating their effectiveness during construction and operation.

With regards to road traffic noise, low-noise road surfaces, acoustic barriers, traffic management and noise insulation schemes can all be considered. With regards to railway noise, rail and wheel roughness maintenance, track design, acoustic barriers, traffic management and noise insulation schemes can all be considered.

Priority should be given to reducing noise at source, and noise insulation schemes should be considered as a last resort. UKHSA expects any proposed noise insulation schemes to take a holistic approach which achieves a healthy indoor environment, taking into consideration

noise, ventilation, overheating risk, indoor air quality and occupants' preference to open windows. There is, at present, insufficient good quality evidence as to whether insulation schemes are effective at reducing long-term annoyance and self-reported sleep disturbance [30], and initiatives to evaluate the effectiveness of noise insulation to improve health outcomes are strongly encouraged.

UKHSA notes the suggestion in DMRB methodology that post-construction noise monitoring cannot provide a reliable gauge for reference against predicted impacts of operational noise. The issues highlighted in DMRB relate to noise exposure, and not to health outcomes. UKHSA suggests that monitoring of health and quality of life can be considered pre and post operational phases, to ascertain whether mitigation measures are having the desired effect for local communities.

UKHSA expects consideration of potential adverse effects due to noise and vibration during construction and recommends that a full and detailed Construction Environmental Management Plan (CEMP) is developed and implemented by the Applicant and/or the contractor responsible for construction. UKHSA recommends that the CEMP includes a detailed programme of construction which highlights the times and durations of particularly noisy works, the measures taken to reduce noise at source, the strategy for actively communicating this information to local communities, and procedures for responding effectively to any specific issues arising.

There is a paucity of scientific evidence on the health effects attributable to construction noise associated with large infrastructure projects [6, 7] where construction activities may last for a relatively long period of time. UKHSA recommends that the Applicant considers emerging evidence as it becomes available and reviews its assessment of impacts as appropriate.

Green Spaces and Private Amenity Areas

UKHSA expects proposals to take into consideration the evidence which suggests that quiet areas can have both a direct beneficial health effect and can also help restore or compensate for the adverse health effects of noise in the residential environment [31-33]. Research from the Netherlands suggests that people living in noisy areas appear to have a greater need for areas offering quiet than individuals who are not exposed to noise at home [31]. Control of noise at source is the most effective mitigation for protecting outdoor spaces; noise insulation schemes do not protect external amenity spaces (such as private gardens and balconies or community recreation facilities and green spaces) from increased noise exposure.

UKHSA expects consideration to be given to the importance of existing green spaces as well as opportunities to create new tranquil spaces which are easily accessible to those communities exposed to increased noise from the scheme. These spaces should be of a high design quality and have a sustainable long-term management strategy in place.

Step-changes in Noise Exposure and the Change-effect

The Applicant should take into consideration the “change-effect”, i.e. the potential for a real or anticipated step-change in noise exposure to result in attitudinal responses that are greater or lower than that which would be expected in a steady state scenario [30, 34]. Where a perception of change is considered likely, UKHSA recommends that the change-effect is taken into account in the assessment for the opening year of the proposed development. For longer term assessments, the effects of population mobility need to be taken into consideration.

Community Engagement and Consultation Feedback

UKHSA recommends that public consultations carried out during the planning application process clearly identify the predicted changes to the sound environment during construction and operation of the scheme, the predicted health effects on neighbouring communities, proposed noise mitigation strategies and any proposed measures for monitoring that such mitigation measures will achieve their desired outcomes.

Some individuals in local communities can encounter barriers preventing them from engaging in the NSIP process, for example time constraints, inability to attend meetings and difficulty navigating documentation. Failure to sufficiently engage with residents may lead to concerns and resistance to the project [35]. UKHSA encourages the Applicant to use effective ways of communicating with local communities. For example, immersive and suitably calibrated audio-visual demonstrations can help make noise and visual changes more intuitive to understand and accessible to a wider demographic. If the proposed scheme will have an impact over a relatively large geographical area, the Applicant should consider community-specific fact-sheets and/or impact maps, which are easily accessible to all individuals both in hard copy and online. If online, search functionality can potentially be included, for example, by postcode.

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By email only: ilpnorth@planninginspectorate.gov.uk

Your ref: TR510001

Our ref:

Date: 03-DEC-2024

Dear Sir / Madam

Planning Act 2008 (as amended) and The Infrastructure Planning (Environmental Impact Assessment) Regulations 2017 (the EIA Regulations) – Regulations 10 and 11

Application by Intermodal Logistics Park North Limited (the Applicant) for an Order granting Development Consent for the Intermodal Logistics Park North (the Proposed Development)

Scoping consultation and notification of the Applicant's contact details and duty to make available information to the Applicant if requested

Thank you for allowing United Utilities Water Limited (UU) the opportunity to comment on the EIA Scoping Opinion Request for the proposal for Intermodal Logistics Park North.

UU wishes to make the following comments at this early stage regarding the scope of any EIA. We request continued engagement to ensure our concerns are adequately addressed and to ensure appropriate protective provisions are agreed. In the interim, we wish to provide the following initial comments.

We request that you take account of the issues we have raised in the Environmental Statement (ES) so that they are appropriately assessed and mitigated. At the current time, we are concerned that you have chosen to scope out certain matters from your ES. We request that the applicant engages with UU to further discuss the proposal and the potential impact on our assets and operations via email at planning.liaison@uuplc.co.uk.

1. Our Assets and Property

United Utilities will not allow building over or in close proximity to a water main.

United Utilities will not allow building over or in close proximity to a public sewer.

You should not assume that our assets can be diverted.

We would expect to see plans showing the proposals in relation to any existing UU assets and infrastructure as part of the proposal.

United Utilities' Assets

We would like to draw the applicant's attention to the various water assets that lie within and near to the proposed scoping boundary. Our assets include assets that are identified as no longer in service. The status of these assets would need to be confirmed. Any proposals must give careful consideration to our assets, including during the construction process.

We require access as detailed in our '*Standard Conditions for Works Adjacent to Pipelines*' (a copy of this document can be found on our website). You must comply with this document and it should be taken into account in the final proposals, or a diversion may be necessary.

When working in the vicinity of our assets, developers must contact our Developer Services team prior to commencing any works on site, including (inter alia) site investigations, trial holes, site preparatory works, groundworks, remediation or demolition. Please see '*Contacts*' section below.

It is the applicant's responsibility to investigate and demonstrate the exact relationship between UU's assets and the proposed development.

A number of providers offer a paid for mapping service, including UU (see '*Contacts*' section below). The position of the underground apparatus shown on water and wastewater asset maps is approximate only and is given in accordance with the best information currently available. Therefore, we strongly recommend the applicant, or any future developer, does not rely solely on the asset maps to inform decisions relating to the detail of their site and instead investigates the precise location of any underground pipelines and apparatus. Where additional information is requested to enable an assessment of the proximity of proposed development features to UU's assets, the proven location of pipelines should be confirmed by site survey; an extract of asset maps will not suffice. The applicant should seek advice from our Developer Services team on this matter. See '*Contacts*' Section below. UU will not accept liability for any loss or damage caused by the actual position of our assets and infrastructure being different from those shown on asset maps.

Developers should investigate the existence and the precise location of water and wastewater pipelines as soon as possible as this could significantly impact the preferred site layout and/or diversion of the asset(s) may be required. Unless there is specific provision within the title of the property or an associated easement, any necessary disconnection or diversion of assets to accommodate development, will be at the applicant/developer's expense. In some circumstances, usually related to the size and nature of the assets impacted by proposals, developers may discover the cost of diversion is prohibitive in the context of their development scheme.

Any agreement to divert our underground assets will be subject to a diversion application, made directly to UU. This is a separate matter to the determination of a Development Consent Order (DCO). We will not guarantee, or infer acceptance of, a proposed diversion through the planning process (where diversion is indicated on submitted plans). If an application to divert or abandon underground assets is submitted to UU and subsequently rejected (either before or after the determination of a DCO), applicants should be aware that they may need to amend their proposed layout to accommodate UU's assets.

Where UU's assets exist, the level of cover to UU's pipelines and apparatus must not be compromised either during or after construction and there should be no additional load bearing capacity on pipelines without prior agreement from UU. This would include sustainable drainage features, ecological proposals, earth movement and the transport and position of construction equipment and vehicles.

Any construction activities in the vicinity of UU's assets, including any assets or infrastructure that may be located outside the applicant's Order Limits, must comply with national building and construction standards and our '*Standard Conditions for Works Adjacent to Pipelines*'. The applicant, and/or any subsequent developer should note that our '*Standard Conditions*' guidance applies to any design and construction activities in close proximity to pipelines and apparatus that are no longer in service, as well as pipelines and apparatus that are currently operational.

It is the applicant's responsibility to ensure that UU's required access is provided within any proposed layout and that our infrastructure is appropriately protected. The developer would be liable for the cost of any damage to UU's assets resulting from their activity.

Vibration, Loading and Settlement

UU requests that the impact of the proposed development includes an assessment of any potential settlement and vibration on UU's assets. Similarly, any loading on UU's assets during operation or during construction requires further consideration with UU.

Storage of Equipment and Materials within Easements / Offset Areas for Access and Maintenance

UU has not undertaken a detailed assessment of where equipment and/or materials are proposed to be stored within a UU easement / area required for access and maintenance. As a general requirement, UU does not usually allow the easement area, easement width or the necessary offset distance from our assets to be obstructed or impeded in any way. This is due to, but not limited to:

- loading implications of the asset and probability of asset failure;
- implications on access and maintenance of the asset, especially for critical assets;
- security of supply; and
- health and safety implications.

UU reserves the right to instruct the removal of equipment and materials located within any easement / access and maintenance offset area. UU requires further consultation and supplementary information to discuss any affected assets.

Construction Compounds / Construction Traffic

We wish to emphasise that construction compounds should not be located on top of our apparatus. This is because we require unrestricted access for maintenance, repair and replacement to discharge our statutory duties. Similarly, detailed consideration will need to be given to any proposed construction traffic routes to assess the impact on our assets. It will be necessary to ensure that any approach to construction is the subject of a construction management plan to address a range of issues including the protection of our assets as well as any wider impact on our operations.

Ecological Mitigation and Biodiversity Net Gain

UU wishes to emphasise that ecological mitigation and the delivery of areas for biodiversity net gain should not be located on top of our apparatus. This is because we require unrestricted access for maintenance, repair and replacement to discharge our statutory duties.

Property Interests

UU owns a parcel of land (Land Registry Title CH584733) within the site boundary. This is an observation borehole. We request further details of whether this asset will be affected by the proposed development. There should be no adverse impact on the operations of UU as a result of the development proposals.

Within the scoping area boundary, there are several easements which are in addition to our statutory rights for inspection, maintenance and repair. It is the applicant's responsibility to obtain a copy of the easement documents, available from UU Legal Services or Land Registry. The applicant must comply with the provisions stated within the document.

Under no circumstances should anything be stored, planted or erected on the easement width. Nor should anything occur that may affect the integrity of the pipes or the legal right of UU to 24 hour access. The applicant should contact our Property team to discuss how the proposals affect our land interests and to ensure no detrimental impact. UU Property Services can be contacted at PropertyGeneralEnquiries@uuplc.co.uk.

Please note that within our wider asset base there are a number of assets, which although owned and operated by UU, are not always in our land ownership. For example, assets transferred under private sewers legislation.

2. Drainage (Foul and Surface Water) and Flood Risk

Existing drainage systems are often dominated by combined sewers. This method of sewer infrastructure is a result of the time it was constructed, with combined sewers taking both foul and surface water. If there is a consistent approach to surface water management, it will help to manage and reduce surface water entering the sewer network, decreasing the likelihood of flooding from sewers, the impact on residents and businesses, and the impact on the environment by reducing the likelihood of sewer spills.

We would be grateful if you can provide details of any drainage proposals in respect of both foul and surface water. This should include rates of discharge, volumes of discharge, points of connection, the nature and extent of any contaminants, and details of any necessary pre-treatment prior to connection to the public sewer. We request that you provide details of drainage during operation of the proposed development and during the construction period. We request further details of any approach for the storage and disposal of any hazardous fluids. We wish to understand whether there is any intention to connect such flows to our public sewerage network and to ensure any potential impact on water supply assets, including the groundwater environment, is fully considered and mitigated.

Surface Water Management Hierarchy

We wish to emphasise that consistent with the principles of the hierarchy for the management of surface water in national planning policy and the obligations of the Environment Act 2021, no surface water will be allowed to discharge to the existing public sewerage system. Surface water should instead discharge to more sustainable alternatives as outlined in the surface water management hierarchy. This will ensure the impact of development on public wastewater infrastructure, both in terms of the wastewater network and wastewater treatment works, is minimised. We adopt this position as surface water flows are very large when compared with foul flows. By ensuring that no surface water enters the public sewerage system, the impact on customers, watercourses and the environment will be minimised.

Please note, UU is not responsible for advising on rates of discharge to the local watercourse system. This is a matter for discussion with the Lead Local Flood Authority and / or the Environment Agency (if the watercourse is classified as main river).

There should be no land drainage, including dewatering proposals, discharged to the public sewer.

Rights to Discharge to Watercourse or Other Receiving Water Body

Given the importance of surface water discharging to an alternative to the public sewer, we request that all land that is necessary to facilitate a discharge to a watercourse is fully identified within the limits of the DCO. This will ensure the site benefits from the requisite rights to discharge to more sustainable alternatives than the public sewer for the management of clean surface water, e.g., a right to discharge to a watercourse or other water body. For clarity, the extent of land should be sufficient to facilitate a surface water discharge to a watercourse / water body for all elements of your proposal. Ensuring that the extent of land within the Order Limits is sufficient for the purposes of the discharge of surface water is important as a sewerage company has limited powers to acquire the right to discharge surface water to a water body under the Water Industry Act. Therefore you will need to ensure that this right is acquired via your proposed DCO.

Impact on Watercourses

UU wishes to liaise with you to confirm the impact on any watercourses that interact with our assets to ensure that there are no detrimental consequences of these works in terms of asset operation, flood risk and changes could materially affect hydraulic performance and therefore change / increase any risk of flooding

Flood Risk

It should be ensured that your proposed development does not result in an increase in flood risk as a result of any changes to land or property which could materially change existing flood risk, for example, by altering any existing exceedance surface water flood paths. This should be given careful consideration if you are planning any changes to site levels.

Multi-functional Sustainable Drainage Systems (SuDS)

We request that surface water is only managed via SuDS which are multi-functional and at the surface level in preference to conventional underground piped and tanked storage systems.

Wherever practicable, SuDS should be implemented in accordance with the CIRIA SuDS manual. Managing surface water through the use of SuDS can provide benefits in water quantity, water quality, amenity and biodiversity.

If the applicant intends to offer wastewater assets forward for adoption by UU, their proposed detailed design will be subject to a technical appraisal by our Developer Services team and must meet the requirements outlined in 'Sewerage Sector Guidance'. This is important as drainage design can be a key determining factor of site levels and layout.

Acceptance of a drainage strategy does not infer that a detailed drainage design will meet the requirements for a successful adoption application. We strongly recommend that no construction commences until the detailed drainage design, has been assessed and accepted in writing by UU.

Any work carried out prior to the technical adoption assessment being approved is done entirely at the developer's own risk and could be subject to change.

Management and Maintenance of SuDS

Without effective management and maintenance, SuDS can fail or become ineffective. As a provider of wastewater services, we believe we have a duty to advise the determining authority of this potential risk to ensure the longevity of the surface water drainage system and the service it provides to people. We also wish to minimise the risk of a sustainable drainage system having a detrimental impact on the public sewer network should the two systems interact. We therefore recommend that you include details of a management and maintenance regime for any sustainable drainage system that is included as part of the proposed development.

Please note that UU cannot provide comment on the management and maintenance of an asset that is owned by a third party management and maintenance company. We would not be involved in the approval of the management and maintenance arrangements in these circumstances.

3. Water Supply Requirements

We request that you provide details of any water supply requirements for both construction and during operation as soon as possible. If you require a water supply, the information should include details on rates of water supply required in litres per second and anticipated points of connection to the public water supply network. The details of water supply required should include details for any fire response purposes that may be necessary. For temporary related activities, such as construction compounds and workers accommodation, early consideration of any water supply requirements will also be required. If reinforcement of the water network is required to meet potential demand, this could be a significant project and the design and construction period should be accounted for. This will be particularly important to consider in respect of the nature of the future use of the proposed employment units. Different uses and proposals can have differing water demands, for example, data centres. You will need to ensure that your ES fully considers any environmental impact of any water supply requirements. As such, our view is that it is too early to conclude that water availability should be scoped out of the Environmental Statement.

4. Ground conditions

UU requests that the assessment of potential environmental impact from ground conditions including any contamination, hazardous materials or dewatering fully considers the impact on our assets, water resources, the groundwater environment and water quality as a result of construction of the proposed development.

There are a number of potential risk factors associated with the site and proposed development which may have an impact on the underlying aquifer which is actively abstracted by UU. The site is located within the Total Catchment (Source Protection Zone 3) of the following abstraction boreholes:

- Park Road South;
- Kenyon;
- Pocket Nook No.1;
- Lightshaw;
- Houghton Green;
- Winwick; and

- Forest Farm.

We have identified the following receptors which should be considered in future risk assessments, and their protection ensured throughout the construction phase and for the lifetime of the development:

1. The Principal Aquifer underlying the site (associated with Total Catchment of several groundwater SPZs). There is potential for construction to create a direct pathway for contaminants into the underlying aquifer, and there is a lack of confining superficial deposits providing protection to surface contaminants; and
2. Various water mains within the site.

There is potential for the development to result in disturbance and/or contamination of the water mains.

Future reports we would expect to review are:

- Geo-environmental Risk Assessments;
- Ground Investigation Reports;
- Remediation and Verification Reports (as required);
- Construction Environmental Management Plan;
- Hydrogeological Impact Assessment (in line with the Environment Agency's approach to groundwater protection);
- Surface and foul water drainage plans; and
- Piling Risk Assessment (if required).

On this basis, we believe that water quality should remain a component of the Environmental Statement.

5. General Advice

If the applicant intends to receive water and/or wastewater services from UU they should visit our website or contact the Developer Services team for advice at the earliest opportunity. This includes seeking confirmation of the required metering arrangements for the proposed development. See 'Contacts' Section below.

If the proposed development site benefits from existing water and wastewater connections, the applicant should not assume that the connection(s) will be suitable for the new proposal or that any existing metering arrangements will suffice. In addition, if reinforcement of the water network is required to meet potential demand, this could be a significant project and the design and construction period should be accounted for.

In some circumstances we may require a compulsory meter is fitted. For detailed guidance on whether the development will require a compulsory meter please visit our website.

To promote sustainable development UU offers a reduction in infrastructure charges for applicant's delivering water efficient homes and draining surface water sustainably (criteria applies). For further information, we strongly recommend the applicant visits our website when considering any water or wastewater design <https://www.unitedutilities.com/builders-developers/your-development/planning/building-sustainable-homes/>

Business customers can find additional information on our sustainable drainage incentive scheme at <https://www.unitedutilities.com/Business-services/retailers/incentive-schemes/>

To avoid any unnecessary costs and delays being incurred by the applicant or any subsequent developer, we strongly recommend the applicant seeks advice regarding water and wastewater services, and metering arrangements, at the earliest opportunity. Please see 'Contacts' Section below.

Contacts

Website

For detailed guidance on water and wastewater services, including application forms and the opportunity to talk to the Developer Services team using the '**Live Chat**' function, please visit:

<http://www.unitedutilities.com/builders-developers.aspx>

Email

For advice on water and wastewater services or to discuss proposals near to pipelines, email the Developer Services team as follows:

Water mains and water supply, including metering - DeveloperServicesWater@uuplc.co.uk

Public sewers and drainage - SewerAdoptions@uuplc.co.uk

Telephone - 0345 072 6067

Property Searches (for asset maps):

A number of providers offer a paid for mapping service including UU. For more information, or to purchase a sewer and water plan from UU, please visit <https://www.unitedutilities.com/property-searches/>

Water and sewer records can be viewed for free at our Warrington Head Office by calling 0370 751 0101. Appointments must be made in advance. Public sewer records can be viewed at local authority offices. Arrangements should be made directly with the local authority.

We request that the applicant contacts the planning team at planning.liaison@uuplc.co.uk so that the detail of this letter can be discussed further.

Yours faithfully

Andrew Leyssens
Planning, Landscape and Ecology Team
United Utilities Water Limited



WARRINGTON
Borough Council

Professor Steven Broomhead
Chief Executive
Town Hall
Sankey Street
Warrington
WA1 1UH

Clarie Deery
Senior EIA Advisor
The Planning Inspectorate
Environmental Services
Operations Group 3
Temple Quay House
2 The Square
Bristol
BS1 6PN

3rd December 2024

By email only: ilpnorth@planninginspectorate.gov.uk

Our Ref: 2024/01385/SCO
Your Ref: TR051001

Dear Ms Deery

Planning Act 2008 (as amended) and The Infrastructure Planning (Environmental Impact Assessment) Regulations 2017 (the EIA Regulations) – Regulations 10 and 11

Application by Intermodal Logistics Park North Limited (the Applicant) for an Order granting Development Consent for the Intermodal Logistics Park North (the Proposed Development)

Scoping consultation and notification of the Applicant's contact details and duty to make available information to the Applicant if requested

I write further to your letter and email of 5th November 2024 regarding the above and to provide Warrington Borough Council's (WBC) comments on the applicant's request for a scoping opinion.

The development site is within the administrative boundaries of Wigan and St Helens Councils. It is however adjacent to Warrington's boundary and WBC has therefore been consulted as an adjoining authority. Given the proximity of the site to Warrington and the potential impacts of the proposal on the borough and its residents, WBC is keen to remain involved in the DCO process and provide comments and advice at appropriate stages of the process.

Transport

Please see comments from WBC as Highway Authority attached at Appendix 1. In particular, attention is drawn to the concerns regarding the scoping out of construction traffic. It is considered

that there would be considerable construction movements as a result of the proposed development and that these impacts should therefore be scoped in.

Air Quality

Please see comments from WBC Environmental Protection team attached at Appendix 2. Please note the concerns raised regarding the lack of information at this stage, although it is acknowledged that WBC has been consulted by the applicant on the air quality elements relating to the construction process and the applicant is advised to continue this process in order to ensure that potential impacts are properly identified and addressed in the EIA.

Noise and Vibration

Please see comments from WBC Environmental Protection team attached at Appendix 2. As with air quality above, there are concerns regarding the lack of information at this stage, although it is acknowledged that WBC has been approached by the applicant's noise consultants and the applicant is advised to continue this process in order to ensure that potential impacts are properly identified and addressed in the EIA.

Ecology and Biodiversity

Please see comments from the Greater Manchester Ecology Unit (WBC's ecology consultants) attached at Appendix 3. These include a recommendation for the consideration of off-site compensation measures for birds of open farmland and the inclusion of the details of such proposals within the EIA.

Built Heritage

There are a number of locally listed buildings that appear to be within 1km of the site but been neither scoped in nor scoped out of the EIA. Several are close to other heritage assets that have been scoped into the assessment. These include the former cellar to Pipers Hall, Turrett Hall Stone Pit Lane, 115 Stone Pit Lane, The Plough Inn Heath Lane, Beech Farm Heath Lane, Heath House Kenyon Lane, Southworth Hall Southworth Lane and the Lodge Delph Lane. WBC requests that the applicant review these assets, the details of which can be found in the adopted Local Plan and the Council's interactive map - [Cadcorp SIS WebMap 9 - Planning and LLC External](#). It would also be helpful for those who will be reading the ES, including members of the public, if the borough within which each heritage asset is located is identified within the text, in a similar way to table 9.3 in the landscape and visual impact chapter where the borough within which each viewpoint is located is clearly stated.

Hydrology

Please see comments from WBC Lead Local Flood Authority attached at Appendix 4. In particular, regard should be had to areas of Warrington downstream of the proposed development that are at significant risk of flooding.

Geology, Soils and Contaminated Land

Please see comments from WBC Environmental Protection team attached at Appendix 2.

Energy and Climate Change

WBC is unclear why its relevant planning policies and climate and sustainability strategy, action plan and policy are not referenced in this scoping chapter given the proximity of Warrington borough to the site boundary and the fact that greenhouse gas emissions will arise outside of the site boundary, including emissions associated with the transportation of materials to and the removal of waste from the site during construction, and emissions associated with movements to and from the SRFI once operational. WBC requests that the applicant reconsiders its approach in this regard.

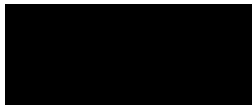
Population and Human Health

Please see the last paragraph of the response from WBC as Highway Authority regarding community safety.

Cumulative and in-combination effects

WBC will work with the applicant to identify a list of 'other development' (as referenced at paragraph 20.10) within Warrington.

Yours sincerely



Niki Gallagher
Development Manager

APPENDIX 1

Environment & Transport Directorate Internal Memorandum

To: Alison Gough

From: Mike Taylor

Date: 13/11/2024

Ref: 2024/01385/SCO

Application: Land to the east of the M6 motorway, to the south of the Chat Moss Line and to the west of Winwick Lane incorporating the triangular parcel of land located to the west of Parkside Road and to the north of the Chat Moss Line

Description: Intermodal Logistics Park North Rail Freight Interchange

I refer to your memo requesting highway comments.

Comments:

The application is for an EIA Scoping Opinion on a Nationally Significant Infrastructure Project (NSIP) for a new strategic railfreight interchange on land northeast of the Parkside development; with the proposal intended to be determined via a Development Consent Order (DCO).

All works affecting the highway within Warrington will be required to meet the Warrington Borough Council (WBC) requirements and certainty would be sought that any future wording of a Development Consent Order ensures that permitted rights are in line with the protocols and statutory notice periods of the New Roads and Streetworks Act 1991 and the Traffic Management Act 2004.

A Transport Assessment (TA) will be required to accompany any application for the proposed development and this should address its potential implications on the transport network by means of a traffic model, capacity assessments, detailed analysis and an overview of potential impacts, including accident analysis using the latest available STATS19 data, together with an overview of the highway design issues. The TA should also include an assessment of parking and servicing requirements and, importantly, demonstrate that the site is accessible by sustainable transport and that a sustainable development can be delivered that is accessible for employees. A key issue will be appropriate linkage to Winwick.

It is noted that Transport impacts are to be included in the proposed EIA and the information included within the Transport chapter of the EIA Scoping Report provides a useful starting point for the scoping of the required TA. Engagement has already commenced with the relevant Highway Authorities likely to be affected by the proposal and this should continue throughout the DCO process.

The principle of using the Parkside Link Road SATURN traffic model to identify impact is considered appropriate, however, the model was used to assess the issues associated with the specific construction of a link road rather than to assess a quantum

and impact of development and given the age of base data within the model then the model will need to be re-calibrated and re-validated to reflect the proposed scenarios and assessment years. WBC will need to ensure that the model reflects current conditions on its network; in particular the key A49 corridor.

There is concern that access to the development is intended to be via M6 Junction 22 and Parkside Link Road and of the subsequent impact on the existing Warrington transport network. In line with previous objection from Wigan Council to development relating to Parkside, it is difficult to understand how a further increased development area can be supported without additional highway infrastructure. Although it is understood that these issues will be addressed through the modelling process.

The approach within the EIA Scoping Report is largely appropriate; although WBC Planning policies and its Local Transport Plan objectives should be considered in respect of issues within Warrington. However, the following issues should be addressed:

There is a concern that construction traffic has been scoped out of the transport impact. The scale of the development site will involve considerable construction movements associated with, for example, earthworks and material import/export. It is acknowledged within the scoping report that construction and operational activities will likely overlap. In view of this it is considered that construction traffic impact should be scoped in; particularly as the development impacts on an area of the WBC transport network that is sensitive to changes in movement patterns. It is understood that previous Parkside EIA submissions included construction impact.

Further clarity is needed as to the core junctions to be surveyed (as highlighted in Table 6.2) as the junction numbers relate to links detailed in figure 6.3 rather specific junctions. It may be that additional junctions need to be added.

Clarity is sought on the approach to journey time assessment and whether journey time on linked routes will be/can be assessed, e.g. routing along A49-A573 (routes 1 & 4).

The effects detailed to be scoped in to the EIA are considered appropriate; namely: severance, driver delay, walk/wheel/cycle delay, pedestrian amenity, fear and intimidation, accidents and safety, and climate change. However, further detail will be required as to the assessment methodology and the potential thresholds considered to determine impact.

Outside of the Transport section of the EIA there is a concern that community safety has been scoped out of the Population and Human Health section. It is appreciated that the primary consideration of community safety relates to crime and injury risk but there is a strong relationship between fear of crime and active travel connectivity. It is considered that community safety should be scoped in.

Mike Taylor
Team Leader – Transport Development Control

APPENDIX 2



| | | | |
|----------------------|-------------------------------|-----------------|---|
| To: | Development Management | From: | Head of Public Protection & Prevention |
| Case Officer: | Mrs Alison Gough | Officer: | Environmental Protection Officer |
| Planning Ref: | 2024/01385/SCO | My Ref: | EP/262745 |
| Date: | 22 November 2024 | | |

Proposal: **Intermodal Logistics Park North Rail Freight Interchange**

Land to the east of the M6 Motorway, south of Chat Moss Line, West Winwick Lane, Parkside Road, Warrington

I have considered the application for a DCO Scoping request and have the following comments to make.

The various elements of the request are noted. We have been approached by Noise consultants to make further comments through the process and have been consulted on the Air Quality elements for the construction process.

The development is located outside of the Warrington Borough Council area although the red line site boundary sits adjacent to WBC areas including some residential dwellings close to the southern motorway junction. These receptors as well as others close to the site will be the primary focus of any review that is undertaken to understand impacts on such properties from a Warrington point of view.

The assessment and significance methodologies presented are consistent with best practice across Air Quality and Noise and at this stage of the development are considered to be acceptable for the development. Contaminated Land elements will be controlled by the authorities where the development is occurring so as an adjacent LA we would have no further comments on Contaminated Land.

What is considered to be wholly lacking at this stage however is any actual detail on the proposal itself or the level of activity therein so reviewing comments for assessment and mitigation proposals without any relevant scene setting or detailed descriptions of the proposed development can only be cursory and uninformed. Incorrect assumptions will likely have been made on the likely level of impacts due to the lack of any suitable or detailed site layouts or activity plans for the proposal. In addition, no up front information has been seen which may clarify any uncertainties or which would otherwise explain the scale and scope of the development.

Environmental Protection Officer
Environmental Protection

APPENDIX 3

Gough, Alison

From: Derek Richardson <[REDACTED]@tameside.gov.uk>
Sent: 19 November 2024 19:21
To: Gough, Alison
Subject: 2024/01385/SCO - Intermodal Logistics Park North Rail Freight Interchange - Ecology Unit

Alison

2024/01385/SCO - Intermodal Logistics Park North Rail Freight Interchange - Land to the east of the M6 motorway, to the south of the Chat Moss Line and to the west of Winwick Lane incorporating the triangular parcel of land located to the west of Parkside Road and to the north of the Chat Moss Line

I would advise –

Thank you for consulting the Ecology Unit on the above request for a Scoping Opinion.

In addition to the ecology surveys proposed by the applicant in their EIA Scoping Report of November 2024 I would advise –

- That habitat and botanical surveys of the site are sufficiently comprehensive so as to be able to identify potential areas of previously unrecorded priority habitat, particularly grassland areas. When assessing the value of grasslands, the potential presence of CHEG-D fungi communities should be considered.
- The Habitat plans should be used to inform masterplans and landscape plans of the site; the conservation hierarchy should be used – that is the three steps of avoid, mitigate and, as a last resort, compensating.
- A range of Priority bird species are associated with the site, including Skylark, Yellow Wagtail and Yellowhammer. Some of these species are birds of open farmland. Particular consideration should be given to bird communities which use the site; if off-site compensation measures are likely to be required for impacts on these species, details of these off-site proposals should be given in the EIA.
- As much detail as possible should be provided in the EIA concerning the proposals for the scheme to achieve the required Net Gain in Biodiversity. A Biodiversity Metric calculation will be needed. If off-site habitat creation and/or enhancement is needed, details of this provision should be provided.

Yours

Derek Richardson

Derek Richardson
Principal Ecologist

Planning and Transportation
Planning and Transportation
Place

[Tameside MBC](#) | [Twitter](#) | [Facebook](#) | [Instagram](#) | [LinkedIn](#)
Dukinfield Town Hall | King Street | Dukinfield | Tameside | SK16 4LA

Tel. [REDACTED]
Mobile. [REDACTED]

This email was sent at a time & date convenient to the sender; please do not feel under any pressure to respond immediately if this is outside your normal working hours.

Email Disclaimer <https://www.tameside.gov.uk/disclaimer>



APPENDIX 4

Environment & Transport Directorate Internal Memorandum

To: Alison Gough
Planning Officer
Development Management

From: Jim Turton
Highway Engineering, Bridges and
Flood Risk Manager
X2542

Jonathan Dawson-Parry
Principal Asset & Flood Risk Engineer
X2534

Date: Friday, 08 November 2024 **Ref:** 2024/01385/SCO

Planning Application Name: Land to the east of the M6 motorway, to the south of the Chat Moss Line and to the west of Winwick Lane incorporating the triangular parcel of land located to the west of Parkside Road and to the north of the Chat Moss Line

Planning Application Proposal: Intermodal Logistics Park North Rail Freight Interchange

Introduction

The Engineering & Flood Risk Team received a request from Development Management on 06 November 2024 to provide a scoping opinion from the Lead Local Flood Authority in respect of an Intermodal Logistics Park North Rail Freight Interchange at Land to the east of the M6 motorway, to the south of the Chat Moss Line and to the west of Winwick Lane (2024/01385/SCO).

The Scoping Report provided outlines the scope of a future Environmental Impact Assessment (EIA) in support of the above application for a Development Consent Order (DCO).

Comments

The Engineering & Flood Risk Team have the following comments to make in respect of 2024/01385/SCO:

- 1) LLFA agrees that the following should be scoped into the EIA at both construction and operation phases:
 - a. Flood risk
 - b. Surface water – quantity and quality
 - c. Foul Water – quantity and quality
- 2) The proposal has the potential, if not managed properly to increase flood risk to Warrington. There are existing areas of Warrington downstream of the

proposed development at significant risk of flooding. The development should aim to provide betterment in respect of flood risk to downstream. Any increase in flood risk is not acceptable.

- 3) The proposal has the potential, if not managed properly to result in environmental and ecological damage to the surrounding area.
- 4) The proposal has the potential, if not managed properly to result in pollution to nearby watercourses / waterbodies etc.
- 5) It is noted that *“The EA’s Flood Map for Planning shows the entirety of the DCO Site to be in Flood Zone 1 (defined as land having a less than 1 in 1,000 annual probability of fluvial or tidal flooding). The nearest EA Flood Zone extents are located approximately 60m west of the DCO Site, associated with the Newton Brook.”*

It should be noted that The Environment Agency Flood Map for Planning does not show the risk of flooding from watercourses with a catchment area of less than 3km² and does not provide information on flood depth, speed or volume of flow. Also, the mapping does not take into account the possible impacts of climate change and consequent changes in the future probability of flooding.

This therefore may be an underestimate of risk.

- 6) The Warrington Local Plan 2021/22 – 2038/39 was formally adopted at a meeting of full council on Monday 4 December 2023 and is now the statutory Development Plan for the Borough to 2038/39.

The Local Plan 2021/22 – 2038/39 replaces the Local Plan Core Strategy 2014 in its entirety and will be used in the determination of planning applications.

The applicant is strongly advised that proposals will need to comply with and meet the requirements of Policy ENV2 in respect of flood risk within the new local plan. Please see link below for further information:

<https://www.warrington.gov.uk/sites/default/files/2023-12/Warrington%20local%20plan%20-%202021-22%20-%202038-39%20-%20Adopted%20December%202023.pdf>

The applicant should familiarise themselves with Policy ENV2 and the requirements contained within.

- 7) Future drainage proposals should mimic existing drainage catchments
- 8) Assessment of existing watercourses in respect of condition / suitability etc is required. Assessment to be provided as part of drainage strategy submission for planning permission. If the watercourse is found to be in poor condition, measures to bring the watercourse up to a good standard are to be included in

the detailed drainage design. This should include checking that downstream culverts are in good clean condition and suitable e.g. sized appropriately

- 9) Future proposals should include maintenance / management plan for all drainage elements (existing and proposed) within the development and should be included as part of any future planning application. This is to ensure that the drainage features on site are appropriately maintained / managed for the lifetime of the development so as that they do not increase flood risk both on and off site.
- 10) Due to the potential impacts on other Council departments. It is strongly recommended, if not already done so, that the LPA consults with any other Council departments which may be impacted by the proposals in order to seek their views.
- 11) Whilst there are no specific comments in respect of the scoping opinion, any future EIA report and/or subsequent planning application will need to consider the above issues.
- 12) The Engineering and Flood Risk Team is of the opinion that the proposed scheme may give rise to very significant environmental effects that cannot be successfully mitigated through sensitive design and other best practice measures.

Other Information

Warrington Borough Council does not accept any responsibility for the design and construction of the works that are the subject of this Consent and any liability for any loss or damage which may arise out of their design, construction, maintenance or use.

Foul drainage has not been considered as it is outside the scope of the Engineering and Flood Risk Team acting as Lead Local Flood Authority.

Flood and Water Management Act 2010 Schedule 3 Implementation - SuDS

The announcement was made on 10 January 2023 that the government has confirmed plans to ensure new developments in England have to adopt new sustainable drainage systems (SUDS) designed to reduce the risk of flooding and water pollution by curbing the use of impermeable services and better replicating natural drainage patterns.

Regulations and processes for the creation of SUDs will be devised through the implementation of Schedule 3 to the Flood and Water Management Act 2010, which sets out a framework for the rollout of drainage systems, a sustainable drainage system approving body, and national standards on design, construction, operation, and maintenance.

Further information is available here:

<https://www.gov.uk/government/publications/sustainable-drainage-systems-review>

The Council understands that there is to be a consultation later this year regarding the plans and Defra intends to develop new rules that will come into effect from 2024. You may wish to consider the impact that the plans will have upon the development.

I trust this is of assistance and please do not hesitate to contact me should you require any further information.

Jim W Turton

Highway Engineering, Bridges and Flood Risk Manager



Wigan♥
Council

EIA SCOPING OPINION RESPONSE

WIGAN COUNCIL REFERENCE: A/24/98170/SO

Date - December 2024

PROPOSED DEVELOPMENT – Scoping opinion for an Order granting Development Consent for the Intermodal Logistics Park North.

SITE ADDRESS - Land to the East of the M6 Motorway, South of Chat Moss Line, West of Winwick Line and land to the West of M6 Motorway and East of the West Coast Mainline.

Contents

Executive summary

- 1.0 Introduction
- 2.0 Planning policy and guidance context
- 3.0 The proposed development
- 4.0 Environmental aspects commentary

Appendix 1 – List of consultees

Executive summary

This is the Scoping Opinion ('the Opinion') response provided by Wigan Council in respect of the content of the Environmental Statement (ES) for the proposed development of a new strategic rail freight interchange (SRFI) and associated development on land which extends into the jurisdiction of multiple Councils, including Wigan Council.

This report sets out the Council's opinion on the basis of the information provided within the Scoping Report entitled '*Intermodal Logistics Park (ILP) North, prepared by Tritax Big Box (Project reference TR51001)*'.

The Opinion only reflects the proposals as currently described by the Applicant.

The Local Planning Authority (LPA) has consulted on the Scoping Report and the responses received have been taken into account in adopting this Opinion.

1.0 Introduction

1.1 In summary, it is the understanding of the LPA that the proposed development consists of a large multi-purpose freight interchange and distribution centre linked into both the rail and trunk road systems.

1.2 It is noted that, under the Planning Act 2008 (as amended), the proposals qualify as a Nationally Significant Infrastructure Project (NSIP) and as such an application for a Development Consent Order (DCO) is to be made to the Planning Inspectorate (PINS) which will examine the DCO on behalf of the Secretary of State.

1.3 Before the DCO application is made, an Environmental Impact Assessment of the proposed development will be undertaken in accordance with the Infrastructure Planning (Environmental Impact Assessment) Regulations 2017 (as amended). The findings of the EIA will be presented within an Environmental Statement (ES) as part of the DCO application.

1.4 To ensure the EIA takes into account all relevant matters, the Applicant has, under Regulation 10 of the EIA Regulations, asked the Secretary of State to confirm their opinion as to the scope of the information to be provided in the ES.

1.5 As the proposed DCO affects land within the Wigan Borough, PINS have consulted the Council and to request views on the submitted formal Scoping Opinion

1.6 The Council agrees with the Applicant's stated position in that the proposed development does not fall within Schedule 1 of the EIA Regulations where an ES is mandatory. However, it would meet the criteria set out under paragraph 10 of Schedule 2 of the EIA Regulations as an 'infrastructure project', specifically under the following:

- Part (a), 'industrial estate development projects;
- Part (c), 'the construction of intermodal transshipment facilities and of intermodal terminals';
- Part (d), 'the construction of railways'; and
- Part (f), 'the construction of roads'.

1.7 It is accepted that the proposed development is likely to give rise to "significant effects on the environment by virtue of factors such as its nature, size and location" due to the scale and nature of the proposed development, the surroundings and the likely cumulative effects with other development. As such there is a need to fully assess the environmental impacts of the proposed development. Accordingly, the proposals are considered to

constitute EIA Development and as such, the DCO application will be required to be accompanied by an ES.

2.0 Planning policy and guidance context

2.1 This section sets out a list and summary of national and local planning policies and guidance/advice which the LPA considers to be of relevance to the proposal in terms of the ES. The following details are given without prejudice and may not be exhaustive at this stage, and their provision does not negate on the need for the applicant to consider any other relevant material standards and/or guidance for each topic area, nor, for completeness, to interrogate the referenced planning policies and guidance/advice documents in further detail in relation to their proposal.

- *National Planning Policy Framework (NPPF)*

The NPPF sets out a presumption in favour of sustainable development and is to be considered in its entirety. Of note, paragraph 7 of the NPPF states that the objective of sustainable development can be summarised as meeting the needs of the present without compromising the ability of future generations to meet their own needs. Paragraph 9 states that plans and decisions need to take local circumstances into account, so that they reflect the character, needs and opportunities of each area.

- *National Planning Practice Guidance*
- *Development Plan*

The development plan or local plan for Wigan Borough comprises of:

- Wigan Local Plan Core Strategy (Saved Policies)
- Wigan Replacement Unitary Development Plan (Saved Policies)
- Places for Everyone Joint Development Plan
- Golborne and Lowton West Neighbourhood Plan
- Standish Neighbourhood Plan
- The Greater Manchester Joint Waste Plan
- The Greater Manchester Joint Minerals Plan

- *Places for Everyone Joint Development Plan*

Expanding on the above, Places for Everyone (PfE) is a joint Development Plan Document produced by nine Greater Manchester districts (Bolton, Bury, Manchester, Oldham, Rochdale, Salford, Tameside, Trafford and Wigan). PfE has now been adopted, and in effect from 21 March 2024.

The following PFE policies are considered to be of relevance to the proposal:

Strategy

JP-Strat6: Northern Areas
JP-Strat8: Wigan-Bolton Growth Corridor
JP-Strat12: Main Town Centres
JP-Strat13: Strategic Green Infrastructure
JP-Strat14: A Sustainable and Integrated Transport Network

Sustainable and Resilient Places

JP-S1 - Sustainable Development
JP-S2 - Carbon and Energy
JP-S3 - Heat and Energy Networks
JP-S5 - Flood Risk and the Water Environment
JP-S5 - Clean Air
JP-S6 - Resource Efficiency

Places for Jobs

JP-J1 - Supporting Long-Term Economic Growth
JP-J2: Employment Sites and Premises
JP-J3: Office Development
JP-J4: Industry and Warehousing Development

Greener Places

JP-G1 - Landscape Character
JP-G2 - Green Infrastructure Network
JP-G3 - River Valleys and Waterways
JP-G4 - Lowland Wetlands and Mosslands
JP-G6 - Urban Green Space
JP-G7 - Trees and Woodlands
JP-G8 - A Net Enhancement of Biodiversity and Geodiversity
JP-G9 - The Green Belt

Places for People

JP-P1 - Sustainable Places
JP-P2 - Heritage
JP-P3 - Cultural Facilities
JP-P4 - New Retail and Leisure Uses in Town Centres
JP-P5 - Education, Skills and Knowledge
JP-P6 - Health
JP-P7 - Sport and Recreation

Connected Places

JP-C1 - An Integrated Network
JP-C2 - Digital Connectivity
JP-C3 - Public Transport
JP-C4 - The Strategic Road Network
JP-C5 - Streets for All
JP-C6 - Walking and Cycling
JP-C7 - Freight and Logistics
JP-C8 - Transport Requirements of New Development

- *Wigan Local Plan Core Strategy Policies:*

SP1 - Spatial Strategy for Wigan Borough
CP2 - Open Space, Sport and Recreation
CP3 - Community Facilities
CP5 - Economy and employment
CP6 - Housing
CP7 - Accessibility
CP10 - Design
CP11 - Historic Environment
CP16 - Flooding
CP17 - Environmental Protection
CP18 - Development Contributions

- *Saved Wigan Replacement Unitary Development Plan Policies*

R1E - Open Space in New Housing Developments
A1S - Parking in New Development
A1G - Physical Improvements to Bus Network
A1N - Strategic Route Network
A1P - Major Highway Schemes
EV1B - Pollution
C1B - Open Space, Sport and Recreation Provision

- *Supplementary Planning Documents (SPD) and policy/advice notes*

Affordable housing in new residential developments
Design Guide for Residential Development
Open Space in New Housing
Landscape Design
Wildlife habitats and protected species
Air quality

Trees, woodlands and hedges

Access for All

Policy Note: Car parking standards for new development

- *Emerging Wigan Borough Local and Neighbourhood Plans*

The Council are in the process of preparing a new draft Local Plan as a Part 2 Local Plan under the Greater Manchester Places for Everyone Plan that was adopted earlier this year. At present, it has been through two full stages of consultation: Issues and Opportunities in Autumn 2022 and Options and Preferences in Autumn 2023. The Council is at an advanced stage in preparing an Initial Draft of the Local Plan and has sought feedback from key stakeholders in November with a requested deadline for feedback in December. Further consultation is planned to take place within possibly two-three months, for a period of 8 weeks. The consultation undertaken to date has been pursuant to Regulation 18 of the Town and Country Planning (Local Planning) (England) Regulations 2012.

Given the anticipated timeframe of the DCO process, it is likely that the new Local Plan will reach at least Regulation 19 stage during the course of the process. In view of this the Council reserves the right to rely on all policies which form part of the adopted Local Plan, or which can be attributed weight due to the advanced stage of the emerging Local Plan, at the time the DCO is made.

Further to above, the Council can advise that at the present time there are two emerging neighbourhood plans across the Borough:

- *Leigh Central Neighbourhood Plan*
- *Abram Neighbourhood Plan*

3.0 The proposed development

3.1 The proposed development is a Strategic Rail Freight Interchange (SRFI) and associated development comprising:

- Provision of a rail terminal serving up to 16 trains per day, including ancillary development such as container storage, cranes for the loading and unloading of shipping containers, Heavy Goods Vehicle (HGV) parking, rail control building and staff facilities;
- A rail turn-back facility within the Western Rail Chord;
- Up to 687,500 square metres (m²) (gross internal area) of warehousing and ancillary buildings with a total footprint of 555,000m² and up to 137,500m² of mezzanine floorspace, subject to ongoing design and market assessment, comprising a mixture of units with the potential to be rail-connected, rail served and additional units;
- Potential for new road/pedestrian bridges across the Chat Moss Line;
- New road infrastructure and works to existing road infrastructure;
- Provision of an overnight lorry park for users of the SRFI;
- New energy centre and electricity substations, including central battery storage and potential provision of central Combined Heat and Power (CHP) units to augment the grid supply in the case of demand exceeding instantaneous firm and variable supplies;
- Provision of photovoltaics¹⁰ and battery storage on site;
- Strategic landscaping and open space, including alterations to public rights of way and the creation of new ecological enhancement areas;
- Demolition of existing on-site structures (including existing residential dwellings / farmsteads and commercial premises);
- Potential relocation of the Huskisson Memorial; and
- Earthworks to regrade the DCO Site to provide appropriate access, connections to the railway, development plots and landscape zones

4.0. Environmental aspects commentary

The following reflects the main chapters for consideration as outlined in the applicant's Scoping Report, and the Council's comments and conclusion on each.

4.1 Transport

The applicant intends to scope in:

- Anticipated levels of traffic generated by the DCO site during the operation phase.

The applicant intends to scope out:

- Construction traffic travelling to and from the DCO site during the construction phase.

The Transport Chapter outlines the scope and methodology for the assessment of the likely effects arising from the proposed development.

- *Council's commentary:*

The red line boundary of the DCO survey area includes an area of land within Wigan Borough, and it is clearly envisaged that some or all of this land may be developed as part of the Strategic Rail Freight Interchange (SRFA). The assessment should take account of this. As a sensitivity test, the assessment should also take into account a scenario in which some or all of this land (either the whole site or any part of it not required for the SRFA) is developed separately, with or without a connection into the land within St Helens Borough.

These assessments need to take into account impacts on both the local and strategic road networks and must be informed by realistic and robust assumptions about the distribution of traffic associated with the development, in all the scenarios referred to in the preceding paragraph.

It is the Council's view that traffic flows will increase during the construction phase and therefore consideration of the impacts of construction traffic should be scoped into the Environmental Statement. In particular a review of the type and size of deliveries during construction should also form part of this assessment, particularly if there are any abnormal loads required to construct the rail freight interchange.

There are proposals to change the traffic signal arrangement at the A579 Winwick Lane/A572 Newton Road junction. This scheme will be implemented in 2025 and as such, should be factored into any future year assessments.

The Council respectfully requests that the impacts on all and any affecting highways in Wigan are taken into account within the Transport chapter of the ES.

It is the Council's assessment that the transport modelling for the DCO proposal should be undertaken subject to all the above considerations.

4.2 Air quality

The applicant intends to scope in:

- Dust impacts during both the construction and operational phases;
- Road vehicle exhaust emissions generated by vehicles travelling to and from the proposed development during the construction phase;
- Rail emissions as a result of the increase in locomotive movements on the rail network;
- Air quality impacts as a result of combustion plant;
- Construction traffic noise;
- Construction noise;
- Construction vibration (up to a distance of 100m from nearest construction activity likely to induce vibration);
- Operational road traffic noise on surrounding highway network;
- Operational railway noise from additional freight trains;
- Operational noise from DCO Site; and
- Operational railway vibration from additional freight trains.

The applicant intends to scope out:

- Construction vibration beyond a distances of 100m from nearest construction activity likely to induce vibration;
- Operational vibration from vehicles travelling along highway network; and
- Operational vibration from vehicles travelling along Parkside Link Road or new access roads.

- *Council's commentary*

The Council is satisfied with the matters to be scoped in and out of the Environmental Statement. However, we would like to point out that some of the Wigan's NO₂ tubes are mis-named and the concentration values

stated are incorrect. Please can these be reviewed again prior to the publication of the ES.

When undertaking detailed AQ modelling, Wigan Council requests that residential receptors on Winwick Lane near the junction with Newton Road are included, as are residential receptors around 578 Nowton Road and 2 Summercroft Close in Golborne.

4.3 Landscape and Visual Impact Assessment (LVIA)

The applicant intends to scope in:

- Effects on landscape features/landscape fabric within the DCO Site, during both the construction and operational phases;
- Effects on Local Character Areas, during both the construction and operational phases;
- Visual effects, during the construction and operational phases; and
- Night time effects, during the construction and operational phases.

The application intends to scope out:

- Statutory Designated Landscapes during all phases;
- Non-Statutory Designated Landscapes during all phases; and
- Effects on National Character Areas during all phases.

- *Council's commentary*

It is noted that the applicant intends to include a section within the LVIA which considers potential visual impact on openness of the Green Belt as well as an assessment within the Planning Statement which will form part of the wider submission. Wigan Council would like to draw the applicant's attention to the importance of assessing all required aspects of the impact of the Green Belt (not just the visual impact) and would respectfully request that the impacts on the Green Belt are likely to be significant and should therefore be scoped into the ES, by way of a dedicated chapter or dedicated section within the LVIA chapter.

Notwithstanding the above, the Council is satisfied with the matters to be scoped in and out of the ES. Having reviewed the LVIA chapter, the Council is satisfied that that it is comprehensive in terms of the baseline information that is proposed to be used and the existing evidence and policies to be reviewed. The methodology looks to be satisfactory and will follow the most up to date best practice guidance (GVLIA 3). The Council is satisfied at this stage with the proposed viewpoint locations within Wigan Borough but would welcome the opportunity to be further consulted on these if changes are proposed post consultations on the scoping report. Wigan Council will

need some further information, at the appropriate time, on the proposed visualisation types proposed in line with GVLIA 3; the Council would expect they will need to be at least type 3 and potentially type 4 visualisations for some of the viewpoints given the size of the units proposed and the scale of development.

| Table 2 Visualisation Types 1-4 | | Type 1 | Type 2 | Type 3 | Type 4 | |
|---------------------------------------|---|---|---|---|--|--|
| | | Annotated Viewpoint Photograph | 3D Wireline / Model (non-photographic) | Photomontage / Photowire | Photomontage / Photowire Survey / Scale Verifiable | |
| Aim of the Visualisation | | To represent context and outline or extent of development and of key features | To represent 3D form of development / context | To represent appearance, context, form and extent of development | To represent scale, appearance, context, form, and extent of development | |
| Photographic Equipment | Tripod | Recommended but discretionary | Not relevant | Recommended | Necessary | |
| | Panoramic head | Not relevant | | Recommended for panoramas | Necessary for panoramas | |
| | Minimum Camera / Lens | Cropped frame or FFS + 50mm | Not relevant | Cropped frame or FFS + 50mm | Full Frame Sensor (FFS) + 50mm FL lens ¹ | |
| Locational Accuracy | Source of camera/viewpoint location data | GPS, OS Maps, geo-referenced aerial photography | Varies according to technology | Use good quality data: GPS, OS Maps, geo-referenced aerial photography, LIDAR | Use best available data: High resolution commercial data, LiDAR, GNSS, or measured / topographic surveys | |
| | Survey-verified ² | Not relevant | | | When appropriate | |
| Data & Presentation | Verifiable (SNH) ³ | Not relevant | | | Required | |
| | 3D model | Not required | Required | | | |
| | Image Enlargement ⁴ | Typically 100% | Not relevant | Typically 100% | 100% - 150% | |
| | Form of Visualisation | sketch / outline / arrows | massing / wireline / textured | wireline / massing / rendered / textured to agreed AVR level ⁵ | | |
| | Viewpoint mapping | Dedicated viewpoint location plan | | | | Dedicated viewpoint location plan, + individual inset maps recommended |
| | Reporting of methodology and data sources | Outline description of sources and methodology recommended | | Data, sources and methodology recommended | | Verifiable data, sources and methodology required |

4.4 Ecology and biodiversity

The applicant intends to scope in:

- Impacts on scattered trees during all phases;
- Impacts on broadleaved woodland, ponds and ditches during all phases;
- Degradation of retained habitats during all phases;
- Invasive non-native flora during all phases;
- Amphibians during all phases;
- Impact on badger, bats and birds (breeding and non-breeding) during all phases; and
- Impact on hedgehog and invertebrates during all phases.

The application intends to scope out:

- Impacts on otters, reptiles and water voles during all phases.

- *Council's commentary*

The Council is satisfied with the matters proposed to be scoped in and out of the ES; however, we have the following comments with respect to the scope and methodology for the assessment of the likely effects arising from the proposed development:

In addition to the ecology surveys proposed by the applicant in their ES Scoping Report it is advised –

- That habitat and botanical surveys of the site are sufficiently comprehensive so as to be able to identify potential areas of previously unrecorded priority habitat, particularly grassland areas. When assessing the value of grasslands, the potential presence of CHEG-D fungi communities should be considered.
- The Habitat plans should be used to inform masterplans and landscape plans of the site; the conservation hierarchy should be used – that is the three steps of avoid, mitigate and, as a last resort, compensating.
- A range of Priority bird species are associated with the site, including Skylark, Yellow Wagtail and Yellowhammer. Some of these species are birds of open farmland. Particular consideration should be given to bird communities which use the site; if off-site compensation measures are likely to be required for impacts on these species, details of these off-site proposals should be provided in the ES.
- As much detail as possible should be provided in the ES concerning the proposals for the scheme to achieve the required Net Gain in Biodiversity. A Biodiversity Metric calculation will be needed. If off-site habitat creation and/or enhancement is needed, details of this provision should be provided.

4.5 Built heritage

The applicant intends to scope in:

- Non-designated Heritage Assets within the DCO site during all phases;
- Designated Heritage Assets within 1km of the DCO site during all phases; and
- Non-designated Heritage Assets within 1km of the DCO site during all phases.

The applicant intends to scope out:

- Some Designated Heritage Assets within 1km of the DCO site (Bowl Barrow West of Highfield Lane and Castlehill Motte and Bailey during all phases; and
 - Some Non-Designated Heritage Asset within 1km of the DCO site (no. 149 Mill Lane, The Millhouse PH, Nos 45-51 Golborne Dale Road and No. 6 Bull Houses, Nos 18-14 Bull Houses during all phases.
- *Council's commentary*

The Council requests that the likely effects on the non-designated heritage asset known as Sandfield Hall is scoped into the ES.

With the exception of the above, the Council is satisfied with the matters to be scoped in and out of the ES and the outlined scope and methodology of the assessment of likely effects.

4.6 Archaeology

The applicant intends to scope in:

- Prehistoric remains during the construction phase;
- Roman remains during the construction phase;
- Medieval remains during the construction phase; and
- Post-medieval remains during the construction phase.

The applicant intends to scope out:

- Prehistoric remains during the operational phase;
- Roman remains during the operational phase;
- Medieval remains during the operational phase; and
- Post-medieval remains during the operational phase.

- *Council's commentary*

The Council is satisfied with the matters to be scoped in and out of the ES and the scope and methodology of the assessment of likely effects.

4.7 Hydrology

The applicant intends to scope in:

- Flood risk, surface and foul water (quantity and quality) and potable water supply – with the exception of flood risk from coastal, reservoir and canal sources during all phases.

The applicant intends to scope out:

- N/a
- *Council's commentary:*

The Council is satisfied with the matters to be scoped in and out of the ES and the scope and methodology of the assessment of likely effects.

4.8 Geology and land contamination

The applicant intends to scope out:

- Impacts on receptors from contamination and ground gas arising from the DCO site and nearby during the construction phase;
- Loss of minerals resource during the operational phase; and
- Hydrogeological changes impacting upon Highfield Moss SSI.

The applicant intends to scope in:

- Impacts on or loss of soils and geology as a resource;
 - Impacts on receptors from construction related activities;
 - Encountering UXO; and
 - Mining related impacts.
- *Council's commentary*

The Council is satisfied with the matters to be scoped in and out of the ES and the scope and methodology of the assessment of likely effects.

4.9 Minerals and waste

The applicant intends to scope in:

- Waste arising from demolition and operation; and
- Waste arisings from enabling works and construction.

The applicant intends to scope out:

- N/a.
- *Council's commentary*

The Council is satisfied with the matters to be scoped in and out of the ES and the scope and methodology of the assessment of likely effects.

4.10 Energy and Climate Change

The applicant intends to scope in:

- Effect of proposed development on climate change (construction stage and operational stage GHG emissions; and
- Climate change resilience.

The applicant intends to scope out:

- N/a.
- *Council's commentary*

The Council is satisfied with the matters to be scoped in and out of the ES and the scope and methodology of the assessment of likely effects.

4.11 Socio-economic

The applicant intends to scope in:

- Impacts on residents who could work on the construction phase of the development;
- Impacts on residents who could benefit from employment opportunities at the proposed development once operational;
- Impact on economic output as a result of temporary construction activity;
- Impact on local industrial and logistics businesses;
- Temporary disruption caused to local businesses and employment uses;
- Impact on the skills and training levels of the local labour force;
- Impact on economic output as a result of permanent operations;
- Impact on demand for housing within the labour market area due to increased operational employment;
- Impact on local authority revenues;
- Impact on land use and accessibility; and
- Impact on demand for housing within the labour market area due to increased operational employment.

The applicant intends to scope out:

- Impact on local social infrastructure as a result of an increase in on-site jobs.
- *Council's commentary*

The Council is satisfied with all matters that are to be scoped into this Chapter, but would respectfully request that the likely impact on local infrastructure, as a result of an increase in on-site jobs is also scoped in. In the Council's view, the likely impacts on local infrastructure are likely to be significant.

With the ES, the Council requests that the definition of local residents is clear and unambiguous and must, in part, specifically refer to the opportunities for Wigan Borough residents and potential community wealth building initiatives and /or projects that could be delivered as part of the DCO.

4.12 Population and human health

The applicant intends to scope in:

- Risk taking behaviour during construction phase;
- Impact on open space, leisure and play during all phases;
- Impact on transport modes, access and connections during all phases;
- Community identity, culture and resilience and influence during all phases;
- Social participation, interaction and support during the construction phase;
- Impact on employment and income during all phases;
- Climate change mitigation and adaptation during all phases;
- Air quality during all phases;
- Noise and vibration during all phases; and
- Health and social care services during the construction phase.

The applicant intends to scope out:

- Impact on diet and nutrition during all phases;
- Impact on housing and relocation during all phases;
- Community safety during all phases;
- Social participation, interaction and support during the operation phase;
- Education and training during all phases;
- Water quality or availability during all phases;
- Land quality during all phases;
- Impact on radiation during all phases;
- Impact on health and social care services during the operational phase;
- Impact on the built environment during all phases; and
- Wider societal infrastructure and resources during all phases.

- *Council's commentary*

The Council is satisfied with the matters to be scoped in and out of the ES in relation to this topic area and the scope and methodology of the assessment of likely effects.

The Council would however request that an independent comprehensive Health Impact Assessment (HIA) should be considered in addition, and to complement the population health impact identified by the EIA. A HIA will consider the negative and positive impacts of the proposal and will also consider the impact on population health inequalities. A comprehensive HIA will also involve an element of community consultation which can highlight areas of community concern, establish if features of the proposal relevant to the health outcomes are practical or useable and identify options to improve them.

4.13 Major accidents

The applicant intends to scope in:

- Construction hazards during all phases.

The applicant intends to scope out:

- N/a.

- *Council's commentary*

The Council is satisfied with the matters to be scoped in and out of the ES and the scope and methodology of the assessment of likely effects.

Appendix 1 – List of consultees

| External consultees | Internal Consultees |
|---|---|
| <p>a) Greater Manchester Archaeological Advisory Service (GMAAS)*</p> <p>b) Greater Manchester Ecology Unit;</p> <p>*not received at point of issue</p> | <p>c) Transport Policy</p> <p>d) Policy Landscape</p> <p>e) Environmental Protection</p> <p>f) Conservation</p> <p>g) Lead Local Flood Authority*</p> <p>h) Public Right of Way *</p> |