

2 ASSESSMENT SCOPE & METHODOLOGY

2.1 INTRODUCTION

2.1.1 This chapter explains the methodology used to prepare the technical chapters of this ES and describes its structure and content. In particular, it sets out the process of identifying and assessing the likely significant environmental effects of the Proposed Development, with each individual chapter of this ES stipulating its own specific assessment criteria.

2.2 GENERAL APPROACH TO EIA

2.2.1 In accordance with the EIA Regulations (Regulation 18), an ES is a statement which includes at least:-

“(a) a description of the proposed development comprising information on the site, design, size and other relevant features of the development;

(b) a description of the likely significant effects of the proposed development on the environment;

(c) a description of any features of the proposed development, or measures envisaged in order to avoid, prevent or reduce and, if possible, offset likely significant adverse effects on the environment;

(d) 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;

(e) a non-technical summary of the information referred to in subparagraphs (a) to (d); and

(f) any additional information specified in Schedule 4 relevant to the specific characteristics of the particular development or type of development and to the environmental features likely to be significantly affected.

(4) An environmental statement must –

(a) where a scoping opinion or direction has been issued in accordance with regulation 15 or 16, be based on the most recent scoping opinion or direction issued (so far as the proposed development remains materially the same as the proposed development which was subject to that opinion or direction);

(b) include the information reasonably required for reaching a reasoned conclusion on the significant effects of the development on the environment, taking into account current knowledge and methods of assessment; and

(c) be prepared, taking into account the results of any relevant UK environmental assessment, which are reasonably available to the person

Assessment Scope & Methodology

preparing the environmental statement, with a view to avoiding duplication of assessment.

(5) In order to ensure the completeness and quality of the environmental statement –

(a) the developer must ensure that the environmental statement is prepared by competent experts; and

(b) the environmental statement must be accompanied by a statement from the developer outlining the relevant expertise or qualifications of such experts”

2.2.2 Accordingly, in summary, this ES comprises the following information:

- A description of the Proposed Development comprising information about the Site including the nature, design, size and scale of the development;
- The data necessary to identify and assess the main effects which the Proposed Development is likely to have on the environment, including a description of the relevant aspects of the current state of the environment (baseline) and forecasting methods used;
- A description of the likely significant effects of the Proposed Development (construction, operation and vulnerability to risks from major accidents and/or disasters) covering direct effects and any indirect, secondary, cumulative, short, medium and long term, permanent and temporary, positive and negative effects, explained by reference to the Proposed Development’s possible effect on: population, human health, biodiversity, land, soil, water, air, climate, material assets, cultural, architectural and archaeological heritage, landscape and the interaction between any of the foregoing material assets (as appropriate);
- Where significant adverse effects are identified with respect to any of the foregoing, mitigation measures will be proposed in order to avoid, prevent or reduce and if possible offset those effects;
- A description of the reasonable alternatives studied, which are relevant to the Proposed Development;
- A summary in non-technical language of the information specified above; and
- A statement outlining the relevant experience of the experts who have undertaken the assessment and drafted the technical chapters within this ES (provided at the front of this document).

2.3 THE DEVELOPMENT ASSESSED WITHIN THIS ES

2.3.1 The Proposed Development subject to the planning application seeks outline permission for up to 500 residential dwellings, the demolition of Thompson’s Cottage and associated buildings, green infrastructure (including sustainable urban drainage and play space), a vehicular access point, an emergency vehicular point and associated infrastructure and enabling works. Further information on the development is provided within **Chapter 4: The Proposed Development and Alternatives**.

2.3.1 Given the outline nature of the application and to ensure that the Proposed Development, as it evolves with the benefit of subsequent approvals and/or reserved matters, will remain the same as that assessed within this ES, development parameters and accompanying Parameter Assessment Plans have been established and assessed. Together, these contain the parameters and controls defining those aspects of the Proposed Development capable of having significant environmental effects, as defined in the EIA Regulations.

- 2.3.2 The matters encapsulated within the development parameters and Parameter Assessment Plans include:
- Disposition of land uses;
 - Development footprints and maximum heights;
 - Principal means of vehicle access;
 - Indicative internal vehicle/pedestrian access;
 - Green Infrastructure; and
 - Utilities and infrastructure.

- 2.3.3 These parameters are illustrated on **Figures 4.1 – 4.3** and it is these which form the basis of the ES assessments and what is being assessed for any likely significant effects.

2.4 CONSIDERATION OF ALTERNATIVES

- 2.4.1 Schedule 4, Paragraph 2, of the EIA Regulations requires that the ES contain:

“A description of the reasonable alternatives (for example in terms of development design, technology, location, size and scale) studied by the developer... and an indication of the main reasons for selecting the chosen option, including a comparison of the environmental effects”.

- 2.4.2 In addition, the National Planning Practice Guidance ("NPPG") on EIA (Paragraph 035) states that:

“where alternative approaches to development have been considered, the Environmental Statement should include a description of the reasonable alternatives studied which are relevant to the proposed development and its specific characteristics and provide an indication of the main reasons for the choice made, including a comparison of the environmental effects”

- 2.4.3 Accordingly, this ES contains a section within Chapter 4 setting out the alternatives considered.

2.5 SCOPE OF ENVIRONMENTAL IMPACT ASSESSMENT

- 2.5.1 In order to determine the scope of the EIA a request for a Scoping Opinion was submitted on behalf of the Applicant to Coventry City Council on 30th October 2018 (**Appendix 2.1**). The request described the site context, the nature and purpose of the Proposed Development, and identified the proposed scope and structure of the EIA for Knowsley’s consideration.

- 2.5.2 Coventry City Council issued its Scoping Opinion on 21st December 2018 (with accompanying consultee responses previously been provided) (**Appendix 2.2**), confirming its agreement to the suggested disciplines and methodology, with a number of further specific matters.

- 2.5.3 A summary of Coventry’s Scoping Opinion, including consultee responses, is given in **Table 2.1** below. This table also identifies where these comments, where relevant, are addressed within this ES. Any subsequent discussions regarding the scope of the assessment that has been undertaken separately to the EIA scoping process, is discussed within the relevant technical chapters.

Assessment Scope & Methodology

Table 2.1 Scoping Opinion Consultee Responses

Consultee	Summary of Comments/Discussion	Where Concerns Addressed (where relevant)
<p>Coventry City Council Formal Scoping Response 21/12/18</p>	<p>In addition to the matters set out in the Scoping Opinion request, the ES should also address the following matters:</p> <ul style="list-style-type: none"> • Air Quality: assess the net contribution from the SUE and the impact of the construction phase on local air quality • Contaminated Land: the assessment should include testing for pesticides and daughter products • Noise: comments on the desired methodology. Need to consider the impact of the Rugby Club • Water/hydrology/drainage: include the impact of any new outfalls to watercourses as well as observing the Warwickshire historical flooding mapping. Warwickshire County Council drainage team to be engaged to identify whether the proposal will impact upon measures and schemes currently in place around Fillongley. SuDs management train should be used with multiple stages of treatment, and consideration to utilise existing ponds and surface water ditches. • Biodiversity/Ecology: ES should include how the proposals make net gain in line with Policy GE3, along with any mitigation and enhancement particularly with regard to the existing and proposed green infrastructure across the site and its linkages with surrounding proposed development and wider landscape. Cumulative impacts taking into consideration surrounding proposals for development should also be considered. The baseline should identify and assess all the existing green infrastructure connections into the Borough. • Highways: Impact upon local rural highway network and Fillongley crossroads to be considered • Landscape: Include mapping of local landscape characters areas, along with relevant plans and management strategies for the areas. Include assessment of visual and physical effects on surrounding area and landscape and full assessment of potential impacts on local landscape character using landscape assessment methodologies, in addition to cumulative effect with other relevant developments. The North Warwickshire Landscape Character Appraisal 2010 should be included within the baseline assessments, and the impact upon this character area should be explicitly set out. • Cultural Assets: the impact upon setting of locally listed Keresley House should be considered • Socio-economic: impact upon education and healthcare provision across the administrative boundary should be considered 	<p>Air Quality Chapter</p> <p>Ground Conditions Chapter Noise Chapter</p> <p>Water Resources Chapter</p> <p>Ecology Chapter</p> <p>Transport Chapter</p> <p>Landscape and Visual Issues Chapter</p> <p>Archaeology and Cultural Heritage Chapter</p> <p>Socio Economic Chapter</p>
<p>North Warwickshire Borough Council 12/11/18</p>	<ul style="list-style-type: none"> • Socio Economic issues: ensure impacts on education and health take account of provision and capacity in North Warwickshire, requiring cross boundary consultation. • Landscape: Include North Warwickshire Landscape Character Appraisal 2010 within base-line and set out the 	<p>Socio Economic Chapter</p> <p>Landscape and Visual Chapter</p>

ENVIRONMENTAL STATEMENT

Assessment Scope & Methodology

	<p>impacts on this as a result of the Proposed Development, particularly in preventing an 'urban fence' along the administrative boundary</p> <ul style="list-style-type: none"> • Ecology: identify and assess all existing green infrastructure connections into the Borough and sustainability of the northern boundary as a green corridor • Heritage: confirm no conservation areas affected by the proposal in North Warwickshire and closest Listed Building is Corley Hall some distance to the west • Drainage: Engage with Warwickshire County Council as Flood Authority. Village of Fillongley known as a "hot spot" • Transport: Engage with Warwickshire County Council. How traffic impacts can be mitigated on local highway network, specifically Burrow Hill Lane, Rock Lane, Breach Oak Lane and Church Lane Corley. Consider likelihood of enhanced bus services through Corley and Fillongley. • Noise: M6 significant source, however consideration should be given to the nearby Rugby Club • Other: Assess impacts arising from the flood lighting at the Rugby Club 	<p>Ecology Chapter</p> <p>Water Resources Chapter</p> <p>Transport Chapter and associated Transport Assessment</p> <p>Noise Chapter</p> <p>Landscape and Visual and Ecology Chapters</p>
<p>Natural England</p> <p>28/11/18</p>	<p>NE's standard advice is provided which makes general reference to EIA principles and methodology, particularly in relation to biodiversity and geology; designated landscapes and landscape character; access and recreation; soil and agricultural land quality; air quality; climate change adaptation and cumulative and in-combination effects</p>	<p>Landscape and Visual Chapter</p> <p>Ecology Chapter</p> <p>Water Resources Chapter</p> <p>Ground Conditions Chapter</p> <p>Noise Chapter</p> <p>Air Chapter</p>
<p>Conservation – Coventry City Council</p> <p>21/11/18</p>	<p>Happy with methodology proposed for built heritage, including the setting of Corlet Camp hillfort, Holly farmhouse and other non-designated assets. Recommend consideration is given to any impacts on the setting of locally listed Keresley House</p>	<p>Cultural Heritage Chapter</p>
<p>Drainage – Coventry City Council</p> <p>27/11/18</p>	<p>Suggest that the benefits of SuDs should be considered within all relevant chapters.</p> <p>It is noted that high groundwater levels have been reported by residents in other areas of the SUE.</p> <p>Consideration should be given to utilise existing ponds and ditches as part of the drainage system</p> <p>Agree on the impacts/effects identified, however also note that direct impacts of any new outfalls to watercourses should be considered.</p> <p>Suggest that a SuDs management train should be used with multiple stages of treatment where possible</p>	<p>Landscape and visual Chapter</p> <p>Ecology Chapter</p> <p>Ground Conditions Chapter</p> <p>Water Resources Chapter and FRA/drainage strategy</p> <p>Air quality Chapter</p>
<p>Nuneaton & Bedworth Borough Council</p> <p>27/11/18</p>	<p>Agree the scope is comprehensively and sufficiently enough to fully assess the likely significant effects and note it will be prepared by competent experts, as required under legislation.</p>	<p>Throughout the ES</p>

2.5.4 Given the nature and intended longevity of the Proposed Development's operational life, decommissioning has not been considered as part of this study. This EIA focuses on the likely significant effects of the Proposed Development during the construction and operational phases only.

2.5.5 It is also acknowledged that, given the nature of the development and its location, there is unlikely to be any significant adverse effects "*deriving from the vulnerability of the development to risks of major accidents and/or disasters¹*", although consideration has

¹ The Town and Country Planning (Environmental Impact Assessment (EIA)) Regulations 2017; Schedule 4 (8)

Assessment Scope & Methodology

been given to potential significant effects as a result of minor accidents, specifically within the construction stages; these are addressed within relevant disciplines throughout the ES.

2.5.6 Accordingly, the environmental themes scoped into or out of the EIA are given in **Table 2.2**.

Table 2.2: Environmental Themes Scoped In/ Out

EIA Topic (as stated in EIA Reg 2017)	Scoped In / Out	How/Where addressed/Reason for Scoping Out
Population	Scoped in	To be assessed within the Socio Economic chapter and to a lesser degree in other technical environmental chapters where impacts could affect human beings
Human Health	Scoped in	To be assessed within the Air Quality chapter and to a lesser degree in other chapters such as Ground Conditions, Noise Environment, Landscape and Visual, Socio Economic and Transport
Biodiversity (e.g. flora and fauna)	Scoped in	To be assessed within the Ecology and Nature Conservation chapter
Land (e.g. land take)	Scoped in and scoped out	To be assessed within the Landscape and Ecology Chapters. Given the Site is comprised of lower Grade soils and the principle of development has been accepted through its allocation, Agricultural Resources have been scoped out of this ES.
Soil	Scoped in and Scoped out	To be assessed within the Ground Conditions Chapter. Given the Site is comprised of lower Grade soils and the principle of development has been accepted through its allocation, Agricultural Resources have been scoped out of this ES.
Water	Scoped in	To be assessed within the Water Resources and Ecology and Nature Conservation chapters
Air	Scoped in	To be assessed within the Air Quality chapter
Climate (including greenhouse gas emissions)	Scoped in and scoped out	Climate change considered accordingly within relevant disciplines such as Air Quality and Water Resources chapters. Micro climate and overshadowing have been scoped out
Material Assets	Scoped out	It is not considered there are any further 'material assets' to those already addressed within other EIA topics
Cultural Heritage (including Architectural and Archaeological aspects)	Scoped in	To be assessed within the Archaeology and Cultural Heritage chapter
Landscape	Scoped in	To be assessed in the Landscape and Visual chapter
Interrelationship between above factors	Scoped in	Within each relevant topic chapter

2.6 EIA METHODOLOGY

2.6.1 The content of the ES is, in the main, based on the following:

- Review of the baseline situation through existing information, including previous planning application drawings, data, reports, site & desktop surveys;
- Consideration of the relevant National Planning Policy Framework (NPPF) and accompanying NPPG, and the statutory extant and emerging development plan policies;

- Consideration of potential sensitive receptors;
- Identification of likely significant environmental effects and an evaluation of their duration and magnitude where applicable;
- Expert opinion;
- Modelling;
- Use of relevant technical and good practice guidance; and
- Specific consultation with appropriate bodies.

2.6.2 Environmental effects have been evaluated with reference to definitive standards and legislation where available. Where it has not been possible to quantify effects, assessments have been based on available knowledge and professional judgment.

2.7 APPROACH TO DETERMINE SIGNIFICANCE

2.7.1 The EIA identifies the likely ‘significance’ of environmental effects (beneficial or adverse) arising from the Proposed Development. Each technical chapter defines discipline specific ‘likely significant effects’ by the use of pre-determined assessment criteria. Individual disciplines stipulate the specific assessment criteria used within their own technical chapters under Assessment Approach; however in broad terms, environmental effects can be described as adverse, beneficial or neutral on a sliding scale, for example, major-moderate-minor-negligible.

2.7.2 In many technical disciplines, significance reflects the relationship between two factors:

- The magnitude or severity of an effect (i.e. the actual change taking place to the environment); and
- The sensitivity, importance or value of the resource or receptor.

2.7.3 Specific separate criteria for determining the degree of ‘magnitude’ and the degree of ‘sensitivity’ (or importance or value) is clearly defined within each technical chapter, and again is often on a sliding scale (e.g. high-medium-low).

2.7.4 The significance of a particular effect can then be derived from the interaction of the receptor’s sensitivity and the magnitude of change likely to be experienced.

2.7.5 An example of this ‘matrix’ process is indicated below in **Table 2.3**, however it should be noted that this is provided as a general guide only. Discipline-specific methodology is often used rather than generic criteria, as it is recognised that broad criteria does not always cater for particular disciplines, particularly where best practice and guidance require subtle differences. All significance criteria is clearly explained within each technical chapter under the heading of Assessment Approach.

Table 2.3: Example degrees of Significance based on Magnitude/Sensitivity

Magnitude of Change	Sensitivity of Receptor				
		High	Medium	Low	Negligible
High		Major	Major	Moderate	Negligible
Medium		Major	Moderate	Minor to Moderate	Negligible
Low		Moderate	Minor to Moderate	Minor	Negligible
Negligible		Negligible	Negligible	Negligible	Negligible

Assessment Scope & Methodology

2.7.6 Significance of effects would be assigned both before and after mitigation where relevant.

2.8 MITIGATION

2.8.1 Standard measures and the adoption of construction best practice methods to avoid, minimise or manage adverse environmental effects, or to ensure realisation of beneficial effects, are assumed to have been incorporated into the design of the Proposed Development and the methods of its construction from the outset. Further information on the standard measures and construction best practice is detailed in **Chapter 4: The Proposed Development and Alternatives**. Where outlined, the assessment is of the Proposed Development incorporating these measures.

2.8.2 Where mitigation measures are proposed that are specific to an environmental theme (e.g. ecological measures incorporated into the landscaping scheme etc) and are purposely incorporated into the design, these are highlighted within the relevant technical chapter as 'mitigation by design' (or 'integral/embedded mitigation') and may be subject to appropriate planning conditions or obligations.

2.8.3 Where the assessment of the Proposed Development has identified potential for adverse environmental effects, the scope for mitigation of those effects, for example by way of compensatory measures, has been considered and is outlined in the appropriate technical chapter. It is assumed that such measures would be subject to appropriate planning conditions or obligations.

2.8.4 Where the effectiveness of the mitigation proposed has been considered uncertain, or where it depends upon assumptions of operating procedures, then data and/or professional judgment has been introduced to support these assumptions.

2.9 CUMULATIVE AND IN-COMBINATION EFFECTS

2.9.1 The ES responds to the requirement in the Regulations to assess the cumulative effects of the Proposed Development. Within EIA, cumulative effects are generally considered to arise from:

- Inter-project Cumulative Effects: The combined effects of development schemes which may, on an individual basis be insignificant but, cumulatively, have significant effect; and
- Intra-project Cumulative Effects: The combined effect of individual effects (for example noise, airborne dust or traffic) on a single receptor where deemed potentially significant (referred to as "in-combination" in the Design Manual for Roads and Bridges (DMRB) Volume 11 Environmental Assessment).

Inter-project Cumulative Effects

2.9.2 With respect to inter-project cumulative effects, the EIA Regulations state that consideration should be given to "*other existing and/or approved projects*" (Schedule 4, paragraph 5(e)). This is further supported by the NPPG which states "*There are occasions.....when other existing or approved development may be relevant in determining whether significant effects are likely as a consequence of a proposed development*" (Paragraph: 024 Reference ID: 4-024-20170728).

2.9.3 A review has been undertaken of "existing and/or approved projects", which alongside the Proposed Development, could potentially result in cumulative significant effects. Recently approved projects have been identified as follows:

- Land bounded by Hall Brook, Bennetts Road South, Sandpits Lane and Tamworth Road. (OUT/2014/2282) Approved 12/02/2018 for 800 dwellings, with associated Local Centre comprising Convenience Store (Class A1) Retail/Commercial Units (Class A1, A2, A3, A5 and/or D1); primary school; public open space; allotments; nature conservation area and landscaping. This approved project forms part of the wider Housing Strategic Allocation at Keresley.

2.9.4 No further recently approved projects have been identified which are considered relevant to consider, however it is acknowledged the Site forms part of the wider Housing Strategic Allocation at Keresley. Whilst the entire allocation has yet to be subject to planning approvals (except the area noted above), it is acknowledged that the allocation could be considered as a "reasonable foreseeable" development as referred to within the European Guidance in relation to cumulative impacts. An indicative masterplan for the Keresley Sustainable Urban Extension is included at **Appendix 2.3**.

2.9.5 Consideration to the potential for cumulative effects with the wider allocation will therefore be given to an appropriate level of detail in relevant disciplines within the ES, having regard to the level of information that is available at this time and reasonable judgments about the likely range of effects. This will specifically ensure that the Proposed Development would not prejudice the potential for this wider development.

2.9.6 It is noted that 3 parcels of the allocation have been subject to either (undetermined) planning applications and/or screening requests as follows:

- Land between Tamworth Road and Fivefield Road (OUT/2019/0022), Applicant Bellway Homes): An outline planning application has been submitted for demolition of existing structures, 550 dwellings with associated access, pedestrian/cycle and emergency access, diversion of public rights of way, highway improvements, parking, landscaping, public open space and associated infrastructure. This parcel of land lies to the south of the subject Site, adjacent to the area subject to planning approval. The submitted illustrative masterplan is included at **Appendix 2.4**. The application has yet to be determined at the time of writing this ES;
- Rookery Farm, Watery Lane (OUT/2018/3080, Applicant JG Gray Ltd, Gillitt Properties Ltd & Newcombe Estates Company Ltd): An outline planning application has been submitted for up to 40 dwellings with associated landscaping/open space, drainage and highway infrastructure. The submitted illustrative masterplan is included at **Appendix 2.5**. The application has yet to be determined at the time of writing this ES; and
- Land at Bennetts Road (SCR/2018/0468, Applicant David Wilson Homes): A Screening request has been made for 450 dwellings with associated works. This parcel of land lies to the south east of the subject Site, to the east of Bennetts Road and the area subject to planning approval.

2.9.7 It should be noted that the extent to which the overall allocation needs to be considered within each environmental discipline inevitably varies. This strategy was set out within the Scoping Report agreed by Coventry City Council.

Intra-project Cumulative Effects and In-Combination Effects

2.9.8 Intra-project effects are the combined effect of individual effects (for example noise, airborne dust and traffic) on a single receptor where deemed potentially significant and are also reviewed in each of the technical chapters of this ES where relevant.

2.9.9 These effects are often incorporated into the general assessment of the Site and not separated out. Each discipline, where relevant, has explained within their chapters when/where such effects exist and how they have been assessed.

Assessment Scope & Methodology

2.10 GENERAL ASSUMPTIONS & LIMITATIONS

2.10.1 The principal assumptions that have been made and any limitations that have been identified in preparing this ES are set out below:

- The principal land uses adjoining the Site remain as at the present day, except where relevant to consider the proposals discussed above;
- Information received from third parties is complete and up to date;
- The design, construction and completed stages of the Proposed Development will satisfy legislative requirements; and
- Conditions, or other legal obligations, will be attached to the planning permission to secure 'mitigation', where considered necessary to make the Proposed Development acceptable.

2.11 STRUCTURE OF TECHNICAL CHAPTER

2.11.1 Throughout the EIA process, the likely significant environmental effects of the Proposed Development will be assessed. Within each of the technical chapters the information which will inform the EIA process has generally been set out in the following way:

- **Introduction** - to introduce the topic under consideration, state the purpose of undertaking the assessment and set out those aspects of the Proposed Development material to the topic assessment;
- **Assessment Approach** - to describe the method and scope of the assessment undertaken and responses to consultation in relation to method and scope in each case pertinent to the topic under consideration;
- **Baseline Conditions** - a description of the baseline conditions pertinent to the topic under consideration including baseline survey information;
- **Assessment of Likely Significant Effects** - identifying the likely effects, evaluation of those effects and assessment of their significance, considering both construction and operational and direct and indirect effects;
- **Mitigation, Enhancement and Residual Effects**- describing the mitigation strategies for the significant effects identified, noting any residual effects;
- **Cumulative Effects** - consideration of potential cumulative and in-combination effects (as discussed above); and
- **Summary** - a non-technical summary of the chapter, including baseline conditions, likely significant effects, mitigation and conclusion.