NORTHAMPTON COMMUNITY ENERGY SCHEME
RENEWABLE ENERGY CENTRE (GASIFICATION)
AND MECHANICAL PRE-TREATMENT FACILITY

ENVIRONMENTAL IMPACT ASSESSMENT SCOPING REPORT

ON BEHALF OF ROLTON KILBRIDE
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**APPENDICES:**

APPENDIX A APPLICATION SITE CONTEXT PLAN
APPENDIX B SITE LOCATION PLAN
APPENDIX C SCHEDULE 4 OF 2011 EIA REGULATIONS
1. **INTRODUCTION**

1.1 This Environmental Impact Assessment (EIA) Scoping Report has been prepared on behalf of Rolton Kilbride (the “Applicant”) in respect of Northampton Community Energy Scheme on land at Westbridge Depot, St. James’ Mill Road, Northampton (the “Application Site”) which is proposed for a Renewable Energy Centre (REC) powered by an advanced conversion technology (ACT) / gasification plant and a mechanical pre-treatment facility (MPF), and associated infrastructure (the “Proposed Development”).

1.2 The Northampton Community Energy Scheme will be the first of its kind in the UK where a community interest company would sell energy from the plant to local users with profits reinvested into the local community.

1.3 The Application Site is situated within the administrative area of Northamptonshire County Council (NCC). The location and extent of the Application Site are shown on figures provided at Appendix A and Appendix B.

1.4 This Scoping Report has been prepared to identify the likely significant environmental effects of the Proposed Development which will need to be assessed in detail in the EIA and reported within the Environmental Statement (ES), which will accompany the planning application. This Scoping Report has been submitted to NCC to assist in forming their Scoping Opinion.

**Requirement for an Environmental Impact Assessment (EIA)**

1.5 EIA is a process for identifying the likely significant environmental effects (beneficial and adverse) of proposed developments before development consent is granted.

1.6 Under the Town and Country Planning (Environmental Impact Assessment) Regulations 2011 (as amended) the current proposals fall within Schedule 2 Category 3 (a) Industrial installations for the production of electricity, steam and hot water where the development exceeds 0.5 ha.

1.7 Under the EIA Regulations, proposals which fall within the scope of Schedule 2 development should be considered as EIA Development where the proposal is considered likely to have significant effects on the environment by virtue of such factors as its nature, size or location (Regulation 2(b)). It is proposed an EIA will be produced voluntarily in recognition of the strategic significance of the
development and the expected local interest in the proposals. Accordingly in this case the Applicant has volunteered to undertake an EIA rather than request a formal Screening Opinion.

1.8 This report is provided to NCC under Regulation 13 of the EIA Regulations in support of a request by Pegasus Group on behalf of the Applicant for a ‘Scoping Opinion’ regarding the information to be provided within the Environmental Statement (ES) which will accompany the planning application.

1.9 The EIA will be undertaken and prepared with due regard to the criteria of Schedule 4 of the Regulations. The ES will include an assessment of the predicted effects of the Proposed Development, focussing, as required by the EIA Regulations, on those effects that have the potential to be significant. The content of the ES, as well as the overall approach to the EIA, will be designed to reflect other requirements of the EIA Regulations as well as widely recognised good practice in EIA.

1.10 The EIA process identifies likely ‘significant’ environmental effects of proposed developments, by comparing the existing situation, that which pertains before development is carried out (baseline) with the situation once the proposals are in place. The significance of effects during demolition and construction should also be considered. Information required to be included within an ES in accordance with Schedule 4 of the EIA Regulations is described in Appendix C.

1.11 The ES will be prepared with reference to the National Planning Practice Guidance.

**Purpose of the Scoping Report**

1.12 The first stage of the EIA process is to identify the issues which should be addressed in the ES; this is termed ‘scoping’ and the results are presented as a scoping report.

1.13 This Scoping Report sets out the views of the Applicant, as to the proposed scope of the environmental issues to be considered in the EIA and as to the method by which assessment will be undertaken.

1.14 The scoping process allows statutory consultees to comment on the proposed development, the scope of the EIA and the proposed assessment methodology. It
also provides an opportunity for consultees to raise any issues that they consider to be relevant to the EIA process.

1.15 Comments of the local planning authority and other stakeholders are invited as to the method and scope of the assessment proposed to be undertaken as set out in this report.

**Structure of Report**

1.16 Section 2 of this report describes, in broad terms, the nature and derivation of the Application Site and the Proposed Development, whilst Section 3 sets out, under a series of headings, the issues which the EIA will address. Section 4 identifies the proposed structure of the ES.

1.17 Section 5 identifies the statutory consultees and other parties which will be consulted concerning the ES.
2. APPLICATION SITE

Application Site

2.1 The Application Site is located within an industrialised / urbanised area within the Westbridge Depot, St. James Mill Road, Northampton and includes a Northampton Borough Council owned waste transfer station (WTS) alongside other business uses. The WTS would continue to operate alongside the proposed REC and MPF. The site is surrounded by similar industrial buildings and further urban development.

2.2 Access to and egress from the site for vehicles is via St. James Mill Road along the western boundary. Beyond St. James Mill road lies a retail park to the west. A stream which is designated a “main river” runs along the northern boundary of the site reinforced with brick walls along its lower banks with a heavy covering of scrub within the upper banks. Beyond the stream further north is another retail park, garage and other light industrial use and then the A4500 road. To the south is further industrial use including the gas works and petroleum storage facility. A railway line runs parallel to the eastern site boundary with banks covered by dense cover of scrub and other common ruderal species, beyond which is further industrial land and a retail park.

2.3 The site measures approximately 3.7 ha and consists of brick warehouses with corrugated roofing with roads and pavements and a number of loading areas and car parks.

2.4 The site is located in Zone 2 and 3 Flood Risk Area of the Environment Agency flood mapping, albeit benefitting from flood defences and is free from any other environmental designations. The site is not located within an Air Quality Management Area (AQMA) but an AQMA lies close to the site’s boundary. There are no listed buildings or Conservation Areas within the site although there are heritage assets within the vicinity of the site including the Grade II Listed 1980s lift testing tower. There are no public rights of way through the site.

2.5 It is proposed that the Renewable Energy Centre will provide the opportunity for power to be supplied to preferably an interested local businesses or to the local electricity grid. There is also the opportunity to supply heat in the form of steam and / or hot water or a district heating system to any local business that may have a requirement.
2.6 The application site boundary and context is identified on a figure provided at Appendix A and Appendix B.

**Proposed Development**

2.7 The Renewable Energy Centre (REC) is capable of accepting 200,000 tonnes per annum of predominantly refuse derived fuel (RDF) as well as residual commercial and industrial waste (CIW) and potentially municipal solid waste (MSW). The Facility will not accept hazardous or hazardous clinical waste.

2.8 The REC will employ a gasification process to generate power and heat from the RDF; CIW and MSW. The proposed size of the output from the Renewable Energy Centre has been determined based on a number of factors that includes anticipated energy demands, the size of the proposed site, the energy distribution network available and the available feedstock supply.

2.9 The REC will consist of three main buildings which include a mechanical treatment plant with a reception and tipping hall; a gasification and boiler building with a flue located next to the gasification unit; and a steam turbine building. There will be a smaller building containing office and workshop units.

2.10 Details of the plant specification for the gasification process have not been fully finalised at this stage, however, the operations inside the REC can be broadly summarised as follows;

- Vehicles will arrive at the site carrying waste for treatment or RDF, and will be weighed and have their credentials checked prior to access to the other parts of the site. Queuing lanes will be provided to avoid stationary traffic on St. James Mill Road. The vehicles will tip the waste into an enclosed storage area where it will be conveyed into the sorting treatment and process areas.

- The process involves the sorting and treatment of residual waste arriving at the site to reduce its size and extract from it any remaining recyclable materials and provide quality control on the residue material (feedstock) which is then passed to the Advanced Thermal Treatment (ATT) process.

- The recovered materials will be exported from the site for reprocessing and recycling. The ATT heats the feedstock to a temperature up to 1400 degrees Celsius to generate a gas called “syngas”. The syngas is then
combusted in a second chamber and the generated heat used to create superheated steam that is fed into a condensing turbo-generator to produce electricity.

- The plant will be equipped to enable heat to be exported for local use if required. If deployed, it will increase the efficiency of the plant, but will reduce the amount of electricity exported.

- Gases that are released during the ATT process will be cleaned and treated before they are discharged via the flue stack. Residual byproducts from the ATT such as ash from the gasification process and Flue Gas Treatment Residue - also known as Air Pollution Control residue (APCr) - will be removed from the site for subsequent processing. The ash will be recycled into a secondary aggregate whilst the APCr will either be landfilled or sent to a third party re-processor once the process has received the requisite approval.


2.11 The feedstock would be sourced from the surrounding area where possible and consist of both residual waste material (that has available recyclables removed or has previously passed through recovery centres for re-use and recycling and has been deemed to have no further use) as well as waste which requires mechanical treatment. Currently residual waste would typically be landfilled, however, the Proposed Development would provide a facility for the recovery of energy (and potentially heat) whilst also reducing the volume of waste being landfilled.

2.12 It is anticipated that the Renewable Energy Centre gross power output will be rated up to 27MW.

2.13 The Proposed Development will be self-sufficient in providing its own electricity (the parasitic load), whilst surplus electricity will be fed into the local grid by an underground line. The Applicant is exploring the opportunity for the heat produced to be distributed via heat networks.

2.14 The majority of the Renewable Energy Centre process equipment will be housed within a building resembling a standard industrial warehouse complete with a flue stack, the height of which will be determined by the use of an air quality
dispersion model. Subject to planning considerations equipment such as condensers, sprinkler tanks etc. may be placed externally and appropriate screening/enclosures could be provided. The gasification building has a height of approximately 35m rising to 45m. The mechanical treatment plant and tipping hall will have a height of approximately 16m and the steam turbine building will have a height of approximately 20m. At this stage, it is anticipated that the flue stack would have a height of circa 80m.

2.15 The Renewable Energy Centre is to be designed to operate continuously, 24 hours a day 7 days per week. Operational Staff would be required to operate the Energy Centre on a 3-shift pattern.

2.16 Maintenance on the Renewable Energy Centre should be scheduled for twice a year, halting the operation for two weeks in the summer and a week during the winter.

2.17 The introduction of the Renewable Energy Centre provides a number of opportunities and benefits as follows:

- Proven technology with outstanding operational and environmental performance and low emissions;
- An opportunity for a long term Power Purchase Agreement that supplies power and heat providing greater price certainty, smoothing out the volatility in energy prices to enhance financial planning;
- Production of lower cost renewable energy for local businesses with connections to local energy users via underground cable;
- A community interest company which would sell energy from the plant to local users with profits reinvested into the local community;
- Clear progression in the transition to a low-carbon economy with grid carbon offset;
- Reducing greenhouse gas emissions;
- Job creation across a variety of skills and levels of expertise with employment opportunities for local people;
- Transforming a dated industrial site with new design and an appropriate level of landscape planting;
Compliance with Government policy and the Industrial Emissions Directive (IED) to provide sustainable, renewable energy production close to use; and

Large volumes of waste are diverted away from landfill.

Grid Connection

2.18 The Applicant has submitted a budget quotation request and held discussions with the relevant power network operators in the area regarding the scale of the generation considered, which would typically be connected to the local 33kV network via the onsite substation. Western Power Distribution operates the Distribution Network.
3. SCOPE OF THE ENVIRONMENTAL IMPACT ASSESSMENT

3.1 Table 1 sets out how the various environmental parameters as detailed within Schedule 4 of the EIA Regulations will be considered within the ES. Where a topic has been scoped out of the ES the reasoning is provided.

Table 1: Environmental Parameters

<table>
<thead>
<tr>
<th>EIA Topic</th>
<th>Scoped In / Out</th>
<th>How/Where addressed/Reason for Scoping Out</th>
</tr>
</thead>
<tbody>
<tr>
<td>Population</td>
<td>Scoped in</td>
<td>To be assessed within the Socio Economic chapter</td>
</tr>
<tr>
<td>Fauna</td>
<td>Scoped in</td>
<td>To be assessed within the Ecology and Nature Conservation chapter</td>
</tr>
<tr>
<td>Flora</td>
<td>Scoped in</td>
<td>To be assessed within the Ecology and Nature Conservation chapter</td>
</tr>
<tr>
<td>Soil</td>
<td>Scoped in</td>
<td>To be assessed within the Hydrogeology &amp; Ground Conditions chapter</td>
</tr>
<tr>
<td>Water</td>
<td>Scoped in</td>
<td>To be assessed within the Hydrology &amp; Flood Risk chapter</td>
</tr>
<tr>
<td>Noise</td>
<td>Scoped in</td>
<td>To be assessed within the Noise chapter</td>
</tr>
<tr>
<td>Air</td>
<td>Scoped in</td>
<td>To be assessed within the Air Quality chapter</td>
</tr>
<tr>
<td>Climatic Factors</td>
<td>Scoped in</td>
<td>To be assessed within the Hydrology &amp; Flood Risk chapter</td>
</tr>
<tr>
<td>Material Assets</td>
<td>Scoped out</td>
<td>There are no material assets within or in close proximity to the Application Site</td>
</tr>
<tr>
<td>Architectural and</td>
<td>Scoped in</td>
<td>To be assessed within with the Archaeology &amp;</td>
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3.2 It is proposed that the ES will examine each of these issues in turn in individual chapters. The individual chapters will consider, as appropriate, the direct effects and any indirect, secondary, cumulative, short, medium, long-term, permanent and temporary, positive and negative effects of the development. The assessments will consider the significance of the effects identified with reference to the magnitude of the impact and the sensitivity of the receptor. These evaluations will be specific to each environmental discipline in the ES and may involve the use of recognised standards, industry guidance and professional judgement in the assessment.

3.3 Following the assessment of effects, mitigation measures to reduce and avoid any negative effects will be identified and detailed, and any residual significant effects evaluated in each chapter.

3.4 The following sections set out the intended scope of each of the above issues.

**Background, Introduction & Context**

3.5 This chapter of the ES will provide an introduction to the document and the Proposed Development and will set out the national and local context for the scheme. It will provide a summary of the EIA process undertaken; list the chapters within the ES and provide a brief description of the companies which have contributed to the technical chapters within the ES.

**Need & Alternatives**

3.6 It is a requirement of the EIA Regulations to include “An outline of the main alternatives studies...and an indication of the main reasons for this choice, taking into account the environmental effects”. This chapter will include an assessment of the site selection process along with a synopsis of why any other sites and design layouts were discounted. It will provide an indication of the main reasons
for the choice made, taking into account the potential for any environmental effects.

**Air Quality**

**Introduction**

3.7 An assessment of the potential effects of the Proposed Development on air quality will be included within the ES within which air quality, odours and bioaerosols will be considered.

**Baseline**

3.8 The Application Site is not within an Air Quality Management Area (AQMA) although an AQMA is located close to the site, extending along St. James’ Road and a section of St. James’ Mill Road. The scope of the baseline air quality assessment would include liaison with NBC environmental health officers with the aim of agreeing the scope and methodology for the assessment. Existing air quality conditions in the local area will be set out based on local monitoring undertaken by NBC, along with background concentrations as published by Defra.

**Scope of the Assessment**

3.9 The air quality, odour and bioaerosol assessment will include:

- an assessment of emissions from the main stack and any additional ancillary stack(s) (if required);
- an assessment of emissions from road traffic accessing the Proposed Development;
- an assessment of odour and bioaerosols from the Proposed Development;
- an assessment of dust impacts from construction activities; and
- cumulative impact taking into account relevant neighbouring developments.

**Air Quality Impacts of Emissions**

3.10 The REC will be required to meet the emissions limits set out in the European Industrial Emissions Directive (IED). The air quality assessment of emissions from the REC main stack will therefore focus on all pollutants for which an emission limit is prescribed within the IED. These are:
3 Environmental Issues

- nitrogen oxides (NO\textsubscript{x})
- particulate matter (PM\textsubscript{10})
- sulphur dioxide (SO\textsubscript{2})
- carbon monoxide (CO)
- total organic compounds (TOC)
- hydrogen Chloride (HCl)
- hydrogen fluoride (HF)
- cadmium and thallium (Cd & Th)
- mercury (Hg)
- antimony (Sb), arsenic (As), lead (Pb), chromium (Cr), cobalt (Co), copper (Cu), manganese (Mn), nickel (Ni), and vanadium (V); and
- dioxins and furans (PCDDs & PCDFs)

3.11 The release and dispersion of pollutants from the main stack will be modelled using the ADMS-5 model. Emission rates will be determined using the IED emission limits (as a worst-case) combined with other plant-specific model input parameters. The ADMS-5 model will be run using 5-years of meteorological data from a suitable nearby monitoring site, in accordance with Environment Agency guidance.

3.12 Process contributions of each of the pollutants in the IED will be modelled at a series of sensitive receptor locations, representing both human exposure (e.g. residential properties and schools) and sensitive ecological habitats. A grid of receptors will also be used to allow contour plots of concentrations to be presented. A full screening of local sensitive habitats will identify all sites that need to be considered, using the Environment Agency’s radius screening method.

3.13 The significance of the air quality impacts of emissions from the main stack will be determined following Environment Agency and IAQM guidance. Where necessary, total concentrations will be considered, combining the process contribution of the plant emissions and baseline concentrations.

Air Quality Impacts of Road Traffic Emissions

3.14 The proposed REC site is accessed via St. James’ Mill Road. The changes in traffic flows on local roads will initially be assessed against the screening criteria within
the Environmental Protection UK (EPUK) and the Institute of Air Quality Management (IAQM) guidance document: Land-Use Planning & Development Control: Planning For Air Quality. If the changes exceed the thresholds within the criteria a detailed assessment of road traffic emissions will be required and this will be carried out using the ADMS-Roads dispersion model. The ADMS-Roads dispersion model may also be used to predict baseline concentrations within the local area. The model will be verified against local air quality monitoring, which is an essential process for all roads dispersion models.

**Odour and Bioaerosol Impacts**

3.15 The assessment of odours from the Proposed Development will follow a two-stage assessment process including:

- an odour risk assessment; and
- odour dispersion modelling

3.16 The odour risk assessment will be carried out using the methodology published by the Institute of Air Quality Management (IAQM) in its guidance document on the assessment of odours for planning (2014). The odour risk assessment will follow a source-pathway-receptor approach and will examine all potential odour releases from the facility (both controlled and fugitive) and will identify the potential risk of odour impacts at nearby sensitive locations.

3.17 The dispersion modelling will assess odour emissions from the odour control units that will serve the waste reception hall. It is not possible to accurately model any other sources, such as fugitive sources. Nor is it necessary to model the main stack emissions, which will have a low odour emission rate. The modelling will be carried out using the ADMS-5 dispersion model. Results will be compared with published assessment criteria.

3.18 The potential for impacts arising from release of bioaerosols will be assessed qualitatively based on the potential for significant bioaerosol releases, and the proximity to nearby sensitive locations.

**Dust Impacts from Construction Activities**

3.19 The assessment of dust and PM$_{10}$ from construction activities will be carried out using a semi-qualitative methodology published by the Institute of Air Quality Management (IAQM). Where required, recommendations for mitigation measures
to minimise dust and PM$_{10}$ impacts during construction of the facility will be included in the ES Chapter.

**Reporting**

3.20 The findings of the air quality assessment will be drafted into an ES Chapter and technical appendices, in an appropriate format, for submission to NCC in support of the application.

**Townscape and Visual**

**Introduction**

3.21 The Townscape and Visual Impact Assessment (TVIA) will assess the potential effects of the Proposed Development on the townscape character of the area and on the visual amenity of receptors in the vicinity of the Application Site.

**Baseline Conditions**

3.22 The Application Site is not subject to any statutory or non-statutory landscape designation.

3.23 As noted at Section 2 above, the Application comprises an existing industrial site surrounded by existing large-scale built form and transport infrastructure. The surrounding built from comprises a mix of industrial and commercial sites, and residential areas.

3.24 There is little vegetation on and around the Application Site and there are no Public Rights of Way through the site.

**Scope of the Townscape and Visual Assessment**

**Study area**

3.25 Based on knowledge of the local townscape, a 5km study area to consider effects upon townscape character and visual amenity is suggested.

3.26 The extent of the agreed study area will not necessarily preclude the inclusion of certain visual receptors and viewpoints located outside, should they be considered appropriate and identified during the consultation process.

3.27 The refined study area would apply to the TVIA, baseline section, assessment of townscape receptors (townscape / landscape character areas and designations),
and visual receptors (for example people visiting/using designated viewpoints, Public Rights of Way (PRoW), roads and residential areas).

3.28 Proposed developments (consented or pipeline) to be considered in combination with the Proposed Development would be agreed with the Council.

3.29 It is proposed to provide annotated baseline photos, stitched to form a panorama, sufficient to provide evidence in terms of baseline townscape character, views gained, and the extent and inter-visibility with the Proposed Development. Up to 3 visualisations will be provided if considered appropriate.

Methodology

3.30 The TVIA assessment will provide for:

- Assessment of direct and indirect effects on townscape resource (character, elements and features);
- Effects on visual amenity;
- Assessment of cumulative effects where relevant, and
- Assessment and design of mitigation proposals as appropriate.

3.31 The TVIA will be carried out with regard to current best practice guidance, including:

- An Approach to Landscape Character Assessment (October 2014) Natural England;
- Photography and photomontage in landscape and visual assessment (2011) - Landscape Institute Advice Note 01/11;
- Landscape Character Assessment Guidance for England and Scotland (2002) - Countryside Agency / Scottish Natural Heritage; and
3 Environmental Issues


3.32 We would seek the Council’s advice on additional documents and published information to be considered in the assessment.

3.33 The TVIA will address the following:

- Townscape receptors – Local Townscape Character and Planning Policies;
- Townscape receptors – Townscape Features and Elements and Planning Policies; and
- Visual receptors and views.

3.34 Baseline information will be gathered through a combination of desk studies, consultation and field studies. Field surveys will be carried out to gain a better understanding of the site and surrounding area, to determine the townscape resource, character, condition, and to identify visual receptors and barriers.

3.35 The geographical extent of potential visibility for the proposed development will be established by the production of a Zone of Theoretical Visibility (ZTV). This will help identify sensitive visual receptors in the surrounding area to consider the mass, form and alignment of the proposed development. Key viewpoints will be selected to represent a range of views and visual receptor types within the study area. The representative viewpoints would be from publically accessible locations and not from any third party, private land. The representative viewpoints will be used as the basis for determining the effects on the visual receptors within the study area.

Assessment of Proposals

3.36 The information collected under the baseline survey will be analysed, and an assessment made of the nature and significance of the effects on the townscape character and the visual amenity of the site and surrounding area. The significance of effects will be determined by establishing the sensitivity of the townscape and visual receptor and the magnitude of change arising from the proposed development.

Identification of Mitigation Measures and Residual Effects
3.37 Following the assessment of the proposed development, mitigation measures will be identified to reduce any adverse effects of the identified townscape and visual receptors. Following identification of these mitigation measures, the effects on townscape character and visual receptors will be re-assessed to determine the significance of residual effects arising from the proposed development.

**Identification of Preliminary Viewpoints**

3.38 As part of the visual assessment a number of specific locations or representative viewpoints will be assessed within the surroundings of the Application Site. For each of the viewpoints considered, an annotated photograph indicating the location of the proposed development will be produced. Photomontages will only be produced for the most significant and sensitive viewpoints. The preliminary representative viewpoints would include:

1. Junction of St James Road and Byfleet Road – 145m to the north;
2. Public open space near St James Road and Northampton Railway Station – 50m to the north east;
3. Roundabout on junction of St Peters Way and Horseshoe Street – 400m to the east;
4. Nene Way and Grand Union Canal towpath near Briar Hill – 687m to the north;
5. Nene Way near Storton’s Pits Nature Reserve – 635m to south west;
6. Edgar Mobbs Way near Sixfields Stadium – 1370m to the west;
7. Junction of St James Mill Road and Harvey Reeves Road – 147m to the south;
8. Victoria Park, St James End – 570m to the north;
9. Mill Lane overbridge near Kingsthorpe Nature Reserve – 2340m to the north;
10. Public footpath near Great Houghton – 4615m to the west;
11. Hunsbury Hill Country Park – 1817m to the north; and
12. St Crispin Churchyard – 2957m to the north west of the site

3.39 **Traffic & Transportation**

**Introduction**

3.40 This chapter of the ES will consider the potential effects in the vicinity of the Application Site which could arise on the transport network as a result of the Proposed Development during both the construction and operational phases. It will be prepared with reference to the IEMA Guidelines for the Environmental Assessment of Road Traffic.
3.41 The chapter will draw on details from the Transport Assessment (TA) which will be submitted with the planning application. The TA will contain more detailed operational analyses of travel characteristics associated with the Proposed Development. The TA is also required to provide the local highway authorities with the evidence they require to prepare their consultation response.

Scope of the Transport Assessment

3.42 The Proposed Development will have the potential to alter the volume and pattern of traffic movements on the adjoining highway network, both during the construction phase (including demolition of the existing buildings) of the project, and during the course of the facility’s normal operation.

3.43 As the application site has benefited from previous uses including a Waste Transfer Station there is an established acceptable level of traffic generation from the area of land at the site.

3.44 The following principal activities are proposed:

- Review of Existing Transport Conditions - to identify the characteristics of the local road network and environs, which will assist in determining the sensitivity of potential nearby receptors;

- Review of Highway Safety – personal injury accident records will be obtained from the Local Authority for the most recent five-year period available for the study area. The locations, severity and contributory factors will be reviewed and a COBALT analysis undertaken to determine whether there is an unacceptable safety risk related to the highway network that may be materially worsened by the Proposed Development;

- Review of Non-Car Accessibility – options for travel to the Application Site on foot, by cycle and by bus will be reviewed;

- Determine Baseline Traffic Flows – traffic surveys to include the following:
  - Automatic Traffic Counts (ATCs). ATCs on the St. James’ Mill Road and Edgar Mobbs Way to provide baseline traffic flows. The surveys will also provide AADT baseline information for use by the Air Quality consultants, together with 18hour AAWT flows for use by the Acoustic consultants;
3 Environmental Issues

- Peak period (07:00 to 10:00hrs and 16:00 to 19:00hrs) turning counts and queue length surveys at the junctions with St. James’ Mill Road / A4500 and St. James Mill Road / Harvey Reeves Road, to enable capacity analysis.

- Local Highway Authority Liaison has taken place with a separate transport scoping study submitted to the Northamptonshire Highways to agree the parameters of the TA in line with best practice guidance and to ensure that post-submission queries are minimised. Northamptonshire Highways have suggested additional traffic surveys of the following junctions be undertaken as part of the assessment:
  - MCC 1 - Roundabout of Edgar Mobbs Way/A5076; and
  - MCC2 - Additional turning survey to monitor the arrivals / departures throughout the day to validate the trip generations for the various uses on site

- Trip Generation Calculations – using a ‘first principles’ approach in respect of the Proposed Development, as well as the industry-standard database, TRICS, to compare trip generation by the consented and proposed use;

- Junction Capacity – where the change in traffic flows is considered significant, the capacity of affected junctions will be assessed in the opening and design years with and without the Proposed Development to determine the effect on the local road network;

- Transport Assessment Report – prepared in line with current guidance, contained in the Planning Practice Guidance to the National Planning Policy Framework;

- Outline Travel Plan – identify a range of potential travel initiatives designed to maximise non-car travel amongst staff;

- Chapter of the Environmental Statement – prepared with reference to the Guidelines for the Environmental Assessment of Road Traffic and to the findings of the Transport Assessment, and providing supplementary analyses to identify the magnitude and the significance of the transport effects of the Proposed Development.
Hydrology & Flood Risk

Introduction

3.45 An assessment of the potential effects on water resources, to encompass surface water and groundwater quality, surface water and groundwater resources (in terms of water quality) and flooding issues within the vicinity of the Application Site will be conducted.

Baseline Conditions

3.46 The site lies within Flood Zone 2 and 3 although it is protected against flooding by various flood defences in the area. A Level 2 Strategic Flood Risk Assessment has been undertaken on behalf of the Council which examines the flood risk of a number of areas within the town that are potentially within Flood Zones 2 and 3 and / or protected by flood defences. In the first instance it will be necessary to identify flood levels, the nature and integrity of the flood defences and the criteria to be adopted. This will then inform a formal Flood Risk Assessment.

3.47 The site is almost entirely covered by impermeable surfaces (roofs and parking areas). The surface water drainage strategy will be established by information gathered from the existing surface water arrangements, discharge routes, discharge rates and any existing surface water attenuation measures - this information will be critical to informing the surface water drainage strategy.

Scope

3.48 A Flood Risk Assessment will therefore be undertaken, both to demonstrate that the site is not at an unacceptable risk from flooding, that it, and its occupants, will be appropriately safe, and to demonstrate that the proposal does not give rise to an increased flood risk elsewhere. The assessment will identify the potential flood depths across the site for both a 1:100 year and 1:1000 year storm event, including appropriate allowances for climate change. This information will be based upon information obtained from the Environment Agency.

3.49 The proposed development will need to satisfy the National Planning Policy Framework (NPPF) Sequential Test.

3.50 Discussions will be held with the Environment Agency and, supplemented by a site inspection, the integrity of the existing flood defences will be identified.
3.51 The “vulnerability” of various elements of the development will be identified in order that an appropriate level of protection against flooding can be identified (by ensuring that vulnerable and sensitive elements are located above predicted flood levels).

3.52 The assessment will consider whether there is any “loss” of floodplain storage as a result of the development (taking into account the implications that existing buildings on the site have on floodplain storage).

3.53 The drainage strategy will identify the means of disposal of:

- Clean surface water;
- Any contaminated surface water;
- Foul water.

3.54 The ES Chapter will identify any sensitive downstream receptors and the appropriate mitigation measures to ensure that no significant environmental impacts will arise.

**Reporting Effects**

3.55 The EIA process will include the assessment of construction (and demolition) impacts on surface water and groundwater. It will focus on surface runoff and assess the proposed drainage design in the environs of the Application Site. Operational effects such as changes in the rate, volume and quality of runoff and the control of pollution will also be assessed in the EIA.

3.56 Potential impacts and effects will be identified together with any necessary mitigation measures necessary to address any potential significant impacts which might arise.

**Hydrogeology & Ground Conditions**

**Introduction**

3.57 This chapter of the ES will address issues relating to existing geo-environmental conditions at the Application Site, with the aim of ensuring that suitable and safe conditions are achieved for the end-use proposed.

3.58 The range of effects associated with the design, construction (including demolition) and operation of the Proposed Development will be considered.
Scope of Hydrogeology and Ground Conditions assessment

3.59 A detailed Phase 1 Desk Study Assessment (Preliminary Risk Assessment) will be carried out with reference to the NPPF to support the planning submission with regard to geo-environmental issues. It is envisaged that the following scope will be required:

- Undertake a site walkover to record current features that may affect the proposed development including overhead transmission lines, culverted watercourse, sources of potential contamination;

- Review client records and records in public domain kept by the Local Authority with regard to site investigations and remedial actions undertaken on and or near the site;

- Procure and review search data including historical ordnance survey maps, Environment Agency records, Coal Authority report, geological mapping, ground stability report (overview of mining/quarrying), groundwater vulnerability maps and other readily accessible data sources;

- Compile a Phase 1 Detailed Desk Study Report identifying potential constraints to future development from physical features, potential contamination, anticipated strata, previous and current land use;

- Prepare a Conceptual Site Model and preliminary environmental risk assessment.

Potential Effects

3.60 Potential effects to be addressed by this chapter of the ES include:

- Health and safety risks to workers and site visitors during development works from any existing ground contamination, ground gas or other potentially hazardous materials;

- Health and safety risks to future users from any existing ground contamination, ground gas or other materials;

- Risks to proposed new landscaped areas from the release of any existing contamination;

- Risks to groundwater and surface water from the release of any existing contamination;

- Risks to groundwater and surface water from potential contamination attributable to construction plant / activities;
3.61 A chapter will be prepared with regard to ground water quality impact from contaminated land risk.

**Noise**

**Introduction**

3.62 An assessment of the potential noise effects of the Proposed Development during construction and operation will be conducted and reported within the ES.

**Baseline Conditions**

3.63 The site is located within an existing industrial estate, with potentially affected residential dwellings in St. James’ End located approximately 250m to the west of the main buildings, dwellings adjacent to St James’ Road approximately 100 metres to the north, beyond other commercial buildings, and dwellings on Emerald Way to the north west, approximately 120 metres from the site boundary. Existing noise levels around the Proposed Development are principally influenced by road and rail traffic and are likely to be high both during the day and night-time periods and noise from the operation of the site is not anticipated to lead to adverse effects with appropriate mitigation measures implemented within the design.

**Scope of Noise Assessment**

3.64 Noise monitoring will be undertaken to update the baseline information upon which the noise limits would be based.

3.65 The scope of the noise assessment would include liaison with NBC environmental health officers with the aim of agreeing the scope and methodology for the assessment.

3.66 A site visit would be made and unattended noise monitoring equipment installed at two locations representative of the potentially most affected dwellings to the west and north east of the site.

3.67 The equipment would be left on site for a period of 7 days to enable the noise levels to be determined for weekday and a weekend period.
3.68 Following collection of the equipment the monitoring data will be analysed to determine the typical background noise levels at the surrounding noise-sensitive receptors.

3.69 Noise levels will be calculated from the operation of the proposed site at positions representative of the potentially most affected dwellings based upon source term noise data for the proposed plant. It is proposed to model the operation within Soundplan, which would enable noise maps to be produced, if required, in addition to the calculation of noise levels at the potentially affected properties.

3.70 Noise from vehicle movements (feedstock deliveries) will also be included within the modelling. This will be used to determine the plant noise impact in the vicinity and in particular at sensitive receptors.

3.71 Following consultation with the Environmental Health Officer (EHO) at NBC the calculated noise levels will be assessed against relevant standards and guidelines including the NPPF, BS 4142 and NBC's planning guidance on noise.

3.72 Recommendations will be made, in outline, any additional noise mitigation measures which may be required to reduce noise to a satisfactory standard, which would be finalised during the detailed design of the plant.

3.73 An outline construction noise and vibration assessment will be carried out, which would be based upon a likely construction scenario. Preliminary recommendations would be made to ensure noise and vibration levels were adequately controlled during the construction (and demolition) phase.

Reporting

3.74 An ES chapter will be prepared and noise assessment report in the form of a technical appendix.

Ecology and Nature Conservation

Introduction

3.75 This Chapter of the ES will consider the likely ecological issues relating to the Proposed Development. Likely significant effects on habitats and species may arise directly from the uses provided during construction (including demolition) and following the completion of the Proposed Development.

Scope of the Ecology and Nature Conservation Assessment
3 Environmental Issues

Desk Study

3.76 A desk study will be completed, comprising sourcing of relevant ecological data and consultation with stakeholder organisations as required. Baseline information and consultations will be included as part of the assessment.

3.77 Data relating to protected and /or notable species and non-statutory designated sites will be obtained from the local records centre. Biological records will be included with the ES, as appropriate.

Extended Phase 1 Habitat Survey

3.78 An Extended Phase 1 habitat Survey was undertaken on 12th February 2016 to provide information on habitats, the presence or likely presence of protected and notable species and invasive species. The survey followed the methodology detailed in the 'Handbook for Phase 1 habitat survey' (JNCC, 2010).

3.79 The Site lies within an industrialised/urbanised area. The main habitats on site relate to either tarmac (roads, pavement, loading areas and car parks) or large brick warehouses with corrugated roofing. Several smaller brick buildings with felt roofing were also found across the site.

3.80 There are three Local Nature Reserves (LNRs) within approximately 2km of the Application Site; Storton’s Pit, Kingsthorpe and Barnes Meadow. All three primarily comprise wetland and meadow habitats and associated species such as wetland birds, dragonflies and other invertebrates. Several Local Wildlife Sites also lie within 2km of the Application Site, associated with the local network of gravel pits and riparian corridors of the River Nene and its tributaries.

3.81 A stream runs along the northern boundary of the site reinforced with brick walls along its lower banks and with a heavy covering of scrub within the upper banks including buddleia, elder, ash, willowherb, bramble and ivy.

3.82 A railway track runs parallel to the eastern site boundary. Its banks were covered by a dense cover of scrub including buddleia, elder, ivy, bramble, willowherb, broadleaved dock, stinging nettle and other common ruderal species.

3.83 Two man-made mounds were present in the south eastern corner of the site which were overgrown with common grass species and ruderals.
3.84 The majority of habitats on site are generally considered to be of limited ecological value, comprising hardstanding and warehouses with very limited suitability to shelter protected species. Scrub and riparian vegetation along the boundaries of the stream and former railway line at the periphery of the site offers some wildlife value at a site or local level. The areas of overgrown spoil mounds have some potential to provide refuges for amphibians or reptiles if present in the locality. No invasive species were encountered during the survey.

3.85 Several areas are considered to hold potential for bat species. All bat interest is related to a number of gaps and possible entrances through either weathered or fallen bricks, or to gaps between brickwork and corrugated roofing. The majority of the warehouse buildings themselves were considered to be sub-optimal as roost sites for most bat species due to their open nature, however some sections did hold potential for crevice dwelling species such as common *Pipistrellus pipistrellus* and soprano pipistrelle *Pipistrellus pygmaeus* who could exploit small crevices and internal spaces within the larger structure. One section of warehouse was considered to provide higher bat roost potential due to the two story offices present and associated features such as insulated roofing which can provide suitable small roost spaces. A daytime internal inspection and bat survey (focused on the suitable buildings) will be undertaken during suitable weather conditions in early May 2016 in accordance with the Bat Conservation Trust (BCT) Guidelines (Collins 2016).

3.86 No protected or notable bird species are anticipated to be present on site. No evidence was found of barn owl or other Schedule 1 birds at the time of survey, however further inspections will take place alongside bat survey work.

3.87 No evidence of badger was found during survey and the site is not considered suitable for this species.

3.88 The stream (located off-site) was not considered likely to be suitable for either otter or water vole, in particular lacking suitable habitat features for water vole. However as a highly mobile species, it is possible that otter may be occasionally present travelling along the stream corridor as part of a wider territory.

3.89 Amphibians may be present in the wider area especially around the former railway line habitat to the north east. There are local records of common toad and two records of great crested newt within 2km of the Application Site, the nearest located c. 1.7km distant. These recorded locations are separated from the Site by...
urban habitats and roads, and habitat connectivity is considered low. The habitats within the site are considered to be sub-optimal for all amphibian species, lacking any open waterbodies or suitable foraging habitat. The rubble mounds could potentially provide refuge/hibernation habitat if amphibians were present nearby.

3.90 Reptiles are recorded from the wider area and suitable off-site habitat is present around the former railway line habitat to the north east. The habitats within the site however are considered to be sub-optimal for reptile species, lacking foraging opportunities, although the rubble mounds could potentially provide refuge/hibernation habitat if reptiles are present nearby.

**Scope of Impacts Assessment**

3.91 The Chapter will contain an impact assessment which refers to the Chartered Institute of Ecology and Environmental Management (CIEEM) 2016 guidance and will cover:

- Evaluation of identified important features; faunal species, habitats and vegetation (as appropriate) on an international, national and regional basis;
- Description and evaluation of the magnitude and significance of the potential effects of the Proposed Development on statutory and non-statutory sites designated for nature conservation;
- Description and evaluation of the magnitude and significance of the potential effects of the Proposed Development on species, habitats and vegetation, in accordance with current guidelines;
- Detailed species-specific assessment;
- Mitigation and enhancement measures to address the identified effects and identification of any residual effects following mitigation;
- Cumulative assessment; and
- A description and evaluation of residual effects of the Proposed Development.

**Reporting**

3.92 A Chapter for the ES will be accompanied by associated figures and technical reports, as required.

**Archaeology and Cultural Heritage**

**Introduction**
3.93 Potential effects upon heritage assets including below-ground archaeological remains and built heritage will be assessed.

**Scope of Assessment**

3.94 The assessment will address both designated heritage assets such as World Heritage Sites, Scheduled Monuments, Listed buildings, Registered Parks and Gardens, Registered Battlefields and Conservation Areas; and non-designated heritage assets (including relevant sites recorded on the local authority Historic Environment Record). It will assess both potential physical effects upon heritage assets, and potential effects resulting from alteration to their ‘setting’.

3.95 Key heritage statute, policy and professional guidance will inform and guide the assessment works, notably including:

- The 1979 Ancient Monuments and Archaeological Areas Act 1979;
- The Planning (Listed buildings and Conservation Areas) Act 1990;
- The National Planning Policy Framework;
- The National Planning Practice Guide;
- ‘Conservation Principles’ (English Heritage 2008);
- Historic England 2015 ‘The Setting of Heritage Assets’ (Historic Environment Good Practice Advice in Planning: 3); and
- Chartered Institute for Archaeologists professional guidelines.

**Heritage desk-based assessment**

3.96 A heritage desk-based assessment will be undertaken. The objective of the assessment will be to identify the baseline information on heritage for the site and its vicinity in order to inform an assessment of the potential for archaeological remains in the site. Data gathering will focus on accessing the information held on (or at) the:

- Historic England National Heritage List for statutory designated heritage assets (including Scheduled Monuments, Listed Buildings, Registered Parks and Gardens, Battlefields and World Heritage Sites);
- The Warwickshire Historic Environment Record, for details on previous archaeological works, including development control site reports, recorded heritage assets (including archaeological remains), and;
The Warwickshire County Record Office for documentary sources and historic mapping of relevance to the historic development of the site and study area;

The Historic England Archive database (AMIE) for any further records of archaeological discoveries or heritage assets;

The Historic England Archive for any air photographs of the site.

3.97 The site has been subject to a walkover survey (February 2016), including a Level 1 building survey of relevant structures in line with the Historic England guidance Understanding Historic Buildings (2006).

3.98 In order to provide an archaeological context for the proposal site, and to help characterise the heritage resource within its environs, an appropriate study area around the site boundary will be utilised when reviewing the archaeological databases.

3.99 In accordance with the requirements of the National Planning Policy Framework, the assessment will seek to identify any heritage assets affected, and will attempt to determine, where possible based on the information available, the significance of such assets. The Cultural Heritage Assessment will also include a study of any relevant historic mapping, including the production of detailed map regression for the study area using earlier surveys and estate plans, Ordnance Survey and Tithe mapping.

**Standing buildings**

3.100 There are historic buildings on the site associated with a late 19th-century/Early 20th-century saw mills and early 19th-century railway depot. A Level 1 building assessment for these structures will be completed in accordance with Historic England guidelines on recording historic buildings. This will provide information on the age, form and any significance of the structures.

**The Setting of Heritage Assets**

3.101 The setting of designated heritage assets will be considered using the methodology contained within the Historic England guidance The Setting of Heritage Assets (2015). This will include a review of those designated heritage assets which might be impacted by the proposed development and an assessment of whether, how, and to what degree setting makes a contribution to the significance of these heritage assets. This will include an assessment of the nearby Grade II Listed 1980s Lift testing tower.
3.102 A copy of the heritage desk-based assessment will be provided to the County Archaeology Service and agreement will be sought on the results and the level of information provided (pertaining to a proportionate level of information to inform determination of the application as required by Paragraph 128 of the Framework). Requirements for any additional survey work will be addressed where appropriate.

3.103 A stand-alone report will be produced detailing the results of both the heritage desk-based assessment and the settings assessment, fully illustrated, with appendices. The heritage desk-based assessment and settings assessment will inform the production of the ES chapter.

**Socio Economic Issues**

3.104 This chapter of the ES will consider the socio economic issues relating to the Proposed Development. Likely significant effects on social and economic conditions will arise directly from the uses provided as well as the employment opportunities created during the demolition and construction and following the completion of the Proposed Development.

3.105 The baseline position in terms of demographic and economic factors will be presented utilising primary and secondary information, including that received from appropriate bodies.

3.106 The potential effects as a result of the proposals and the impact that this could have on relevant services and facilities, including education, healthcare, recreational facilities and job creation will be examined and assessed. This assessment enables consideration to be given to the ability of existing social infrastructure and that proposed by the development to provide for the Proposed Development. Where additional demands will be generated the methods of mitigation are identified and the residual effects assessed.
3.107 The chapter identifies relevant social and economic policies at all levels. The potential effects of the proposed development on the local demography and economy, in terms of population growth, age profile changes, service capacity and economic growth as well as impacts on the population more generally will be included. Consideration will be given to direct and indirect impacts including opportunities for local economic growth. Reference will be given to, or an assessment given of the cumulative effects of the scheme with other proposed schemes in the local area.

**Reporting**

3.108 The findings of the baseline assessment and the anticipated effects of the proposed development will be set out within a chapter of the ES.

**Cumulative and In-Combination Effects**

3.109 A section of the ES will respond to the requirement in the Regulations to assess the cumulative effects of the Proposed Development. For the cumulative assessment, two types of effect will be considered:

i. The combined effect of individual effects, for example noise, airborne dust or traffic on a single receptor; and

ii. The combined effects of development schemes which may, on an individual basis be insignificant but, cumulatively, have significant effect. This will be conducted principally with reference to committed development in the surrounding area.

3.110 In consultation with NCC, projects which are already operational, have planning permission or which are in the planning system will be included within the cumulative assessment.

**Summary**

3.111 A summary chapter will be included at the end of the ES, providing a synopsis of the findings of the EIA.

3.112 A non-technical summary of the findings will also be prepared, as required by the EIA Regulations.
4. STRUCTURE OF THE ENVIRONMENTAL STATEMENT

4.1 The ES will address the requirements of Parts 1 and 2 of Schedule 4 of the EIA Regulations. The anticipated structure and content of the ES is as follows:

- Chapter 1 Background, Introduction & Context
- Chapter 2 Site Description
- Chapter 3 Development Proposals
- Chapter 4 Need & Alternatives
- Chapter 5 Air Quality
- Chapter 6 Townscape and Visual
- Chapter 7 Traffic & Transportation
- Chapter 8 Hydrology & Flood Risk
- Chapter 9 Hydrogeology & Ground Conditions
- Chapter 10 Noise & Vibration
- Chapter 11 Ecology & Nature Conservation
- Chapter 12 Archaeology & Cultural Heritage
- Chapter 13 Socio- Economics
- Chapter 14 Summary

4.2 Within each of the assessment chapters the main structure of the information presented, although not exclusively, will be as per the following headings:

- Assessment Methodology
- Baseline Conditions
- Likely Significant Effects
- Mitigation and Enhancement
- Residual Effects
- Cumulative and In-combination Effects
- Summary of Findings

4.3 The ES will be supported by Technical Appendices, where appropriate, and a stand alone non-technical summary.
5. STATUTORY AND OTHER CONSULTEES

5.1 This Scoping Report is submitted to Northamptonshire County Council as part of the request for a Scoping Opinion under Regulation 13 of the EIA Regulations 2011.

5.2 It is anticipated that the Northamptonshire County Council will invite statutory and other consultees to comment on the proposed scope and contents of the ES. Consultees who are likely to be contacted and/or will be consulted with during the Scoping process include:

- Northamptonshire County Council Officers
- Northampton Borough Council Officers
- Northamptonshire Highways
- Environment Agency
- Natural England
- Highways England
- Network Rail
- Historic England

5.3 This consultation will also include any other consultation bodies that the Planning Authority nominates, as required under Regulation 15 of the EIA Regulations 2011.
Appendix A

Application Site Context Plan
Site Context Plan
Westbridge Depot,
St James Mill Road, Northampton

Client: Kilbride Group
DRWG No: K0175_15
Drawn by: DB
Approved by: AR
Date: 05/04/2016
Scale: 1:10,000 @A3

Revisions:
First Issue: 05/04/2016 DB

KEY
Site Location
Appendix B

Site Location Plan
Appendix C

Schedule 4 of 2011 EIA Regulations
INFORMATION FOR INCLUSION IN ENVIRONMENTAL STATEMENTS

PART I

1. Description of the development, including in particular -
   
   (a) a description of the physical characteristics of the whole development and the land-use requirements during the construction and operational phases;
   
   (b) a description of the main characteristics of the production processes, for instance, nature and quantity of the materials used;
   
   (c) an estimate, by type and quantity, of expected residues and emissions (water, air and soil pollution, noise, vibration, light, heat, radiation, etc.) resulting from the operation of the proposed development.

2. An outline of the main alternatives studied by the applicant or appellant and an indication of the main reasons for his choice, taking into account the environmental effects.

3. A description of the aspects of the environment likely to be significantly affected by the development, including, in particular, population, fauna, flora, soil, water, air, climatic factors, material assets, including the architectural and archaeological heritage, landscape and the inter-relationship between the above factors.

4. A description of the likely significant effects of the development on the environment, which should cover the direct effects and any indirect, secondary, cumulative, short, medium and long-term, permanent and temporary, positive and negative effects of the development, resulting from:
   
   (a) the existence of the development;
   
   (b) the use of natural resources;
   
   (c) the emission of pollutants, the creation of nuisances and the elimination of waste,

   and the description by the applicant of the forecasting methods used to assess the effects on the environment.

5. A description of the measures envisaged to prevent, reduce and where possible offset any significant adverse effects on the environment.

6. A non-technical summary of the information provided under paragraphs 1 to 5 of this Part.

7. An indication of any difficulties (technical deficiencies or lack of know-how) encountered by the applicant in compiling the required information.

PART II

1. A description of the development comprising information on the site, design and size of the development.

2. A description of the measures envisaged in order to avoid, reduce and, if possible, remedy significant adverse effects.

3. The data required to identify and assess the main effects which the development is likely to have on the environment.
4. An outline of the main alternatives studied by the applicant or appellant and an indication of the main reasons for his choice, taking into account the environmental effects.

5. A non-technical summary of the information provided under paragraphs 1 to 4 of this Part.