

19. Intra-Project Effects

19.1 Introduction

- 19.1.1 This chapter of the PEIR outlines the approach to the assessment of the likely significant effects of the Project with respect to intra-project effects. It should be read in conjunction with the project description provided in **Chapter 2: The Project** and the relevant parts of the following chapters:
- **Chapter 5: Biodiversity;**
 - **Chapter 6: Historic Environment;**
 - **Chapter 7: Water Environment;**
 - **Chapter 8: Landscape and Visual;**
 - **Chapter 9: Air Quality;**
 - **Chapter 10: Noise and Vibration;**
 - **Chapter 11: Traffic and Transport;**
 - **Chapter 12: Ground Conditions;**
 - **Chapter 13: Agriculture and Soil Resources;**
 - **Chapter 14: Land Use;**
 - **Chapter 15: People and Communities;** and
 - **Chapter 16: Major Accidents and Disasters.**
- 19.1.2 The intra-project effects assessment considers likely significant effects from multiple impacts and activities from the construction, operation and decommissioning of the Project on the same receptor, or group of receptors.
- 19.1.3 The potential intra-project effects include Project lifetime effects and receptor-led effects, as follows:
- Project lifetime effects are where phases of the Project interact to create a potentially more significant effect on a receptor than in one phase alone. The phases for the Project are construction, operation/maintenance and decommissioning. Project lifetime effects are scoped out of the assessment for the Project (refer to **Section 19.4**).
 - Receptor-led effects are where effects from different environmental topics combine spatially or temporally on a receptor. These effects may be short-term, temporary, transient or longer-term. Receptor-led effects are considered in this chapter.
- 19.1.4 This chapter describes:
- the legislation, planning policy and other documentation that has informed the assessment (**Section 19.2**);

- details of consultation and engagement undertaken in relation to intra-project effects (**Section 19.3**);
- the scope of the assessment for intra-project effects (**Section 19.4**);
- the assessment methodology which will be applied for the Environmental Statement (ES) (**Section 19.5**); and
- planned further work (**Section 19.6**).

19.2 Relevant legislation, policy and other information and guidance

- 19.2.1 This section identifies the legislation, policy and other documentation that has informed the assessment of effects with respect to intra-project effects. Further information on policies relevant to the EIA and their status is provided in **Chapter 4: Legislation and policy overview**.

Legislation and national planning policy

- 19.2.2 **Table 19.1** lists the key legislation relevant to the assessment of intra-project effects.

Table 19.1 Legislation relevant to intra-project effects

Legislation description	Relevance to assessment
Infrastructure Planning (Environmental Impact Assessment) Regulations 2017	
The Infrastructure Planning (Environmental Impact Assessment) Regulations 2017¹ (“the EIA Regulations 2017”) transpose the provisions of the EIA Directive (2014/52/EU, amending 2011/92/EU).²	The EIA Regulations 2017 require that the effects of a project, where these are likely to have a significant effect on the environment, are taken into account in the decision-making process for that project. Regulation 5(2)(e) of EIA Regulations requires that the EIA must consider the interaction of different environmental effects of the Proposed Development on various topics. This chapter details the consideration of these effects for the Project.

¹ UK Government (2017). The Infrastructure Planning (Environmental Impact Assessment) Regulations 2017. (Online) Available at: <https://www.legislation.gov.uk/uksi/2017/572/contents/made> (Accessed April 2022).

² European Commission (2014). Directive 2014/52/EU of the European Parliament and of the Council of 16 April 2014 amending Directive 2011/92/EU on the assessment of the effects of certain public and private projects on the environment. (Online) Available at: <https://eur-lex.europa.eu/legal-content/EN/TXT/PDF/?uri=CELEX:32014L0052&from=EN> (Accessed April 2022).

19.2.3 **Table 19.2** lists the national and local planning policy relevant to the assessment of inter-related effects. Only the local planning authorities (LPA) with relevant planning policy for intra-project assessments have been included.

Table 19.2 Planning policy relevant to intra-related effects

Description	Relevance to assessment
National Planning Policy	
Overarching National Policy Statement (NPS) for Energy (EN-1)³	
NPS EN-1 includes guidance on what matters are to be considered in the assessment of renewable energy projects.	Paragraph 4.2.6 states that consideration should be given to: <i>‘...the accumulation of, and interrelationship between, effects might affect the environment, economy or community as a whole, even though they may be acceptable when considered on an individual basis with mitigation measures in place.’</i> This chapter of the PEIR describes how intra-project effects will be considered for assessment in the ES.
Draft Overarching NPS for Energy (EN-1)⁴	
The Draft NPS EN-1 includes updated guidance on what matters are to be considered in the assessment of renewable energy projects.	Paragraph 4.2.4 states that consideration should be given to: <i>‘...the accumulation of, and interrelationship between, effects might affect the environment, economy, or community as a whole, even though they may be acceptable when considered on an individual basis with mitigation measures in place.’</i> This chapter of the PEIR describes how intra-project effects will be considered for assessment in the ES.
Local Planning Policy	

³ Department of Energy & Climate Change (2011). Overarching National Policy Statement for Energy (EN-1). (Online). Available at: https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/47854/1938-overarching-nps-for-energy-en1.pdf (Accessed April 2022).

⁴ Department for Business, Energy & Industrial Strategy. 2021. Draft Overarching National Policy Statement for Energy (EN-1). (Online). Available at: https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/1015233/en-1-draft-for-consultation.pdf (Accessed 04 August 2022).

Description	Relevance to assessment
Cheshire East Local Plan Local Plan Strategy 2010 - 2030 Adopted 27 July 2017⁵	Policy SE 8: Renewable and Low Carbon Energy describes the will be supported to help towards sustainable development and does explicitly state <i>“Weight will be given to the wider environmental, economic and social benefits arising from renewable and low carbon energy schemes, whilst considering the anticipated adverse impacts, individually and cumulatively upon...”</i> for the potential impacts within the EIA requirements. Policy SE 12: Pollution, Land Contamination and Land Instability states <i>“The council will seek to ensure all development is located and designed so as not to result in a harmful or cumulative impact upon air quality, surface water and groundwater, noise, smell, dust, vibration, soil contamination, light pollution or any other pollution which would unacceptably affect the natural and built environment, or detrimentally affect amenity or cause harm”</i>.
Halton Delivery and Allocations Local Plan ⁶	Policy GR5: Renewable and Low Carbon Energy states all the different aspects/impacts that need to be considered and assessments included for a newly proposed renewable (or low carbon) energy development, with the Halton Council taking <i>“into account the individual and cumulative impacts”</i>.

Other relevant information and guidance

- 19.2.4 A summary of other relevant information and guidance relevant to the assessment undertaken for intra-related effects is provided here:

⁵ Cheshire East Council. (2017). Cheshire East Local Plan Local Plan Strategy 2010 – 2030 Adopted 27 July 2017. (Online). Available at: https://www.cheshireeast.gov.uk/planning/spatial-planning/cheshire_east_local_plan/site-allocations-and-policies/sadpd-examination/documents/examination-library/bd01-local-plan-strategy.pdf (Accessed 10 August 2022).

⁶ Halton Borough Council. (2022). Halton Delivery and Allocations Local Plan. (Online). Available at: <https://www3.halton.gov.uk/Documents/planning/planning%20policy/newdalp/DALP%20Adopted.pdf> (Accessed 10 August 2022).

- Environmental Impact Assessment of Projects: Guidance on the preparation of the Environmental Impact Assessment Report (Directive 2011/92/EU as amended by 2014/52/EU)⁷ aims to help developers and consultants produce good quality EIA reports. Section 1.4.3 highlights the need to consider interactions between the different environmental topics in a single project. It recommends using interactive matrices that consider the interactions of impacts assessed individually.
- Guideline for the Assessment of Indirect and Cumulative Impacts as well as Impact Interactions⁸ sets out various tools that can be used for intra-related effects, guidance on the approach and assessment. Section 3 of the guidance outlines the tools that can be used for intra-project effects, which are: expert opinion, matrices, consultation and questionnaires, network and systems analysis and spatial analysis. These tools can be used in different combinations at different stages of the project. Section 7.7 of the guidance states the intra-project effects assessment can be within the individual topic chapters or as its own standalone chapter (as in this PIER). Section 7.3.1 of the guidance states where the assessment cannot be quantitative, a qualitative assessment can be carried out.

19.3 Consultation and engagement

19.3.1 **Table 19.3** sets out the comments received in the Scoping Opinion relevant to the inter-related effects assessment and how these will be addressed.

Table 19.3 Planning Inspectorate (PINS) Scoping Opinion responses – intra-project effects

Consultee	Scoping Opinion comment	How this will be addressed in the PEIR and/or ES
St Helen's Borough Council	Chapter 4 outlines the EIA process and includes details of the Cumulative Effects Assessment. This appears to be comprehensive and includes both inter and intra-project effects. However, it is noted that there does not seem to be a separate chapter on this. It would be easier to review if this was included as a separate	Noted, the assessment of intra-project cumulative effects will be presented in a stand-alone chapter in the ES, as presented in this PEIR. The inter-project CEA is contained within the respective topic chapters.

⁷ European Commission (2017). Environmental Impact Assessment of Projects: Guidance on the preparation of the Environmental Impact Assessment Report (Directive 2011/92/EU as amended by 2014/52/EU). (Online) Available at: https://ec.europa.eu/environment/eia/pdf/EIA_guidance_EIA_report_final.pdf (Accessed April 2022).

⁸ European Commission (1999). Guideline for the Assessment of Indirect and Cumulative Impacts as well as Impact Interactions. (Online) Available at: <https://ec.europa.eu/environment/archives/eia/eia-studies-and-reports/pdf/guidel.pdf> (Accessed April 2022).

Consultee	Scoping Opinion comment	How this will be addressed in the PEIR and/or ES
	chapter and not only included in each individual chapter.	
Marine Management Organisation	The MMO wishes to highlight that in sub-section 4.5.1., it states “ <i>a Cumulative Effects Assessment (CEA) will be carried out for the Project, which will examine the result from the combined impacts of the Project with other developments on the same single receptor or resource as required under Paragraph 5(e) of Schedule 4 of the EIA Regulations⁴⁴ and the interaction of environmental aspect effects occurring as a result of the Project in accordance with Regulation 5(2). Two types of effects will be considered</i> ”: these being inter-project effects and intra-project effects. This assessment will be undertaken in the environmental statement and not in the scoping report stage and thus it is not possible to assess its adequacy at present	Noted, we would welcome feedback from the MMO on the preliminary assessment presented in this PEIR and the final assessment that will be presented in the ES. Although we have now agreed with the MMO that an exemption for a Marine Licence will be sought, as a trenchless crossing(s) of the River Mersey will be undertaken.

19.4 Scope of the assessment

Overview

- 19.4.1 This section sets out the proposed scope of the assessment for intra-project effects. This scope has been developed as the project design has evolved and responds to feedback received to date as set out in **Section 19.3**.

Spatial scope and study area

- 19.4.2 The spatial scope of the intra-related effects assessment is based on the Study Areas from each of the environmental topic chapters (**Chapter 5** to **Chapter 18**).
- 19.4.3 The spatial study area is dependent on each receptor. To have a potential intra-project effect a receptor or receptor group must be within the Study Area of more than one environmental topic. An illustrative example of this is described in **Graphic 19.1**; only the orange receptors have the potential to experience intra-project effects as they are in the Study Area for environmental topic 1 and environmental topic 2.

Graphic 19.1 Illustrative example of the spatial scope and study area for an example receptor



- 19.4.4 The Study Area for each of the individual environmental topics (**Chapter 5 to Chapter 18**) relevant to this chapter have been informed via a combination of desk studies, professional judgement, field/survey data, best practice guidance and engagement with stakeholders.

Temporal scope

- 19.4.5 The temporal scope of the assessment of intra-project effects is the entire lifetime of the Project, which therefore covers the construction, operation/ maintenance and decommissioning periods (see **Chapter 2: The Project**).

Activities or impacts scoped out of assessment

Project lifetime effects

- 19.4.6 As described in **Section 19.1** there are two types of assessment for intra-project effects. The first is receptor-led effects, which is scoped in the intra-project effects assessment. The second is project lifetime effects, which have been scoped out of the intra-project effects assessment for the Project.
- 19.4.7 The justification behind scoping out project lifetime effects is as follows:
- For project lifetime effects to occur, multiple phases of the Project must overlap. The phases for the Project are construction, operation/ maintenance and decommissioning. The construction, operation/maintenance and decommissioning phases are temporally distinct from each other; the operation/maintenance phase is currently planned to commence after construction is complete and decommissioning of the Project will only start at the end of its operational life i.e. after the operation/maintenance phase is complete.
 - Therefore, there is no potential for project lifetime effects to occur and they have been scoped out of the intra-project effects assessment.

Environmental topics

- 19.4.8 Greenhouse gases (discussed in detail in **Chapter 17: Climate Change – Greenhouse Gas Emissions**) have been scoped out of the intra-project effects assessment. The only receptor for the greenhouse gas assessment is the global climate and it is not possible for this receptor to experience intra-project effects from any other environmental topics.

In-combination Climate Change Impact Assessment

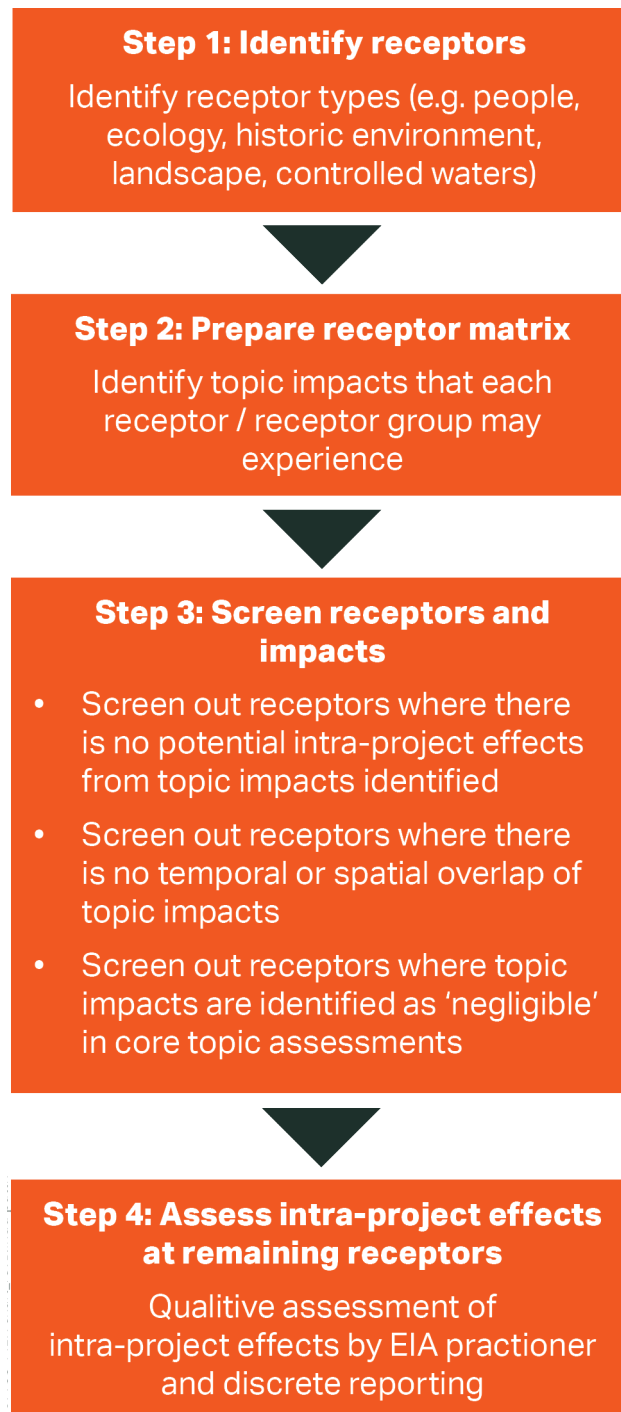
- 19.4.9 The In-combination Climate Change Impact (ICCI) assessment reflects the receptors identified in the environmental topic chapters and would utilise the topic-specific assessment methodologies to assess likelihood and magnitude of the impact, with the combined consideration of future climate change trends and impacts. The assessment uses expert judgement on whether climate change would have a combined effect with the effects already identified by the technical topics. Where a combined effect is identified, additional embedded mitigation measures would be proposed.
- 19.4.10 An ICCI has not been undertaken at this stage due to the preliminary nature of the Project design, however such an assessment will be provided in the ES.

19.5 Methodology

- 19.5.1 There is no established, robust methodology for quantitatively assessing complex cross-topic, intra-project effects and assigning a level of significance to them, as methodologies and criteria vary across environmental topics. Therefore, assessment of intra-related effects between topics is qualitative, relying on professional judgement as to how individual effects would interact.
- 19.5.2 As project lifetime effects have been scoped out of further assessment (see **Section 19.4**), only receptor-led effects are considered.

Receptor-led effects

- 19.5.3 Receptor-led effects are where effects from different environmental topics combine spatially and temporally on a receptor. These effects may be short-term, temporary, transient or longer-term.
- 19.5.4 The methodology is summarised in **Graphic 19.2** and is outlined in detail in the remainder of this section.

Graphic 19.2 **Summary of intra-project effects methodology**

19.5.5 Common receptors for environmental topics have been identified, and consideration given to whether the topics effects on any common receptors are likely to combine. This has identified:

- the common receptor(s) from the individual topics assessments;
- the impact source pathways that can affect the common receptor(s);
- the potential effects on the identified common receptor(s); and

- the intra-related effects across the construction, operation and maintenance and decommissioning phases where appropriate.

19.5.6 It should be noted that some elements of the preliminary assessment inherently consider intra-project effects. For example, biodiversity assessment of effects takes into account the potential for multiple impacts affecting particular features such as disturbance effects on faunal receptors resulting from noise and vibration, visual disturbance and lighting. Where this is the case, this is described within the individual environmental topic chapter and therefore not repeated here.

19.6 Preliminary assessment of intra-project effects

- 19.6.1 Given the preliminary stage of the process, sufficient detail is not currently available to enable a detailed assessment of intra-project effects to be undertaken. Therefore, at this stage the preliminary assessment of intra-project cumulative effects has focused on those receptors where potential significant effects have been predicted in respect of at least two or more environmental topics. A matrix has been developed to summarise where different environmental topics have identified the same receptors. This provides a preliminary assessment of likely cumulative significant effects. Only receptors that would experience residual effects that have the potential to combine with a different type of effect have been included and 'negligible' or 'neutral' effects have been excluded from the matrix. In summary, instances of shared receptors between topics have been identified and identified as potential cumulative effects. If there are no shared receptors identified then there is no potential for cumulative effects.
- 19.6.2 Where an environmental topic assessment only distinguishes between significant and not significant effects, rather than providing a scale of significance, professional judgement (by EIA professionals whose experience will be detailed in the ES) has been used to determine which non-significant residual effects have the potential to result in intra-project effects.
- 19.6.3 **Table 19.4** provides a preliminary summary of the significance of intra-project effects from the Project.
- 19.6.4 The following chapters are not included as they have no common receptors with the other chapters:
- **Chapter 13: Agriculture and Soil Resources**

Table 19.4 Preliminary summary of significance of effect, NS = Not Significant, S = Significant, PS = Potentially Significant

Receptor	Biodiversity	Historic Environment	Water Environment	Landscape and Visual	Air Quality	Noise and Vibration	Traffic and Transport	Ground Conditions	Land Use	People and Communities	Major Accidents and Disasters
Ecological Receptors											
Mersey Estuary SPA, Ramsar Site and SSSI	NS Minor during Construction and Operation	-	NS Minor during Construction	-	-	-	-	-	-	-	-
Ravenhead Ponds LWS	NS Low during Construction	-	NS Minor during Construction and Operation	-	-	-	-	-	-	-	-
Pendlebury Brook (SJ493920-SJ515914) LWS	NS Low during Construction	-	NS Minor during Construction and Operation	-	-	-	-	-	-	-	-
Moore Nature Reserve (LWS)	NS Low during Construction and Operation	-	NS Minor during Construction and Operation	-	-	-	-	-	NS Minor during Construction and Operation	-	-
Rows Wood (LWS)	NS Low during Construction	-	NS Minor during Construction and Operation	-	-	-	-	-	-	-	-
Thatto Heath Meadows LWS	NS Low during Construction	-	NS Minor during Construction and Operation	-	-	-	-	-	-	-	-
Trent and Mersey Canal, summit to Preston Brook Tunnel (GB71210247)	NS Low during Construction	-	NS	-	-	-	-	-	-	-	-
Sutton Manor (LWS)	NS Low during Construction	-	NS Minor during Construction and Operation	NS Minor during Construction	-	-	-	-	-	-	-

Receptor	Biodiversity	Historic Environment	Water Environment	Landscape and Visual	Air Quality	Noise and Vibration	Traffic and Transport	Ground Conditions	Land Use	People and Communities	Major Accidents and Disasters
Pitts Heath Wood LWS (CS)	NS	-	NS Minor during Construction and Operation	-	-	-	-	-	-	-	-
Whittle Brook (SWB)	NS	-	NS Minor during Construction	-	-	-	-	-	-	-	-
Water Receptors											
Lower Mersey Basin and North Merseyside Permo-Triassic Sandstone Aquifers	-	-	NS Minor during Construction and Operation	-	-	-	-	NS Minor during Construction	-	-	NS
Manchester and East Cheshire Permo-Triassic Sandstone Aquifers	-	-	NS Minor during Construction and Operation	-	-	-	-	NS Minor during Construction	-	-	NS
Sankey and Glaze Carboniferous Aquifers	-	-	NS Minor during Construction and Operation	-	-	-	-	NS Minor during Construction	-	-	NS
Weaver and Dane Quaternary Sand and Gravel Aquifers	-	-	NS Minor during Construction and Operation	-	-	-	-	NS Minor during Construction	-	-	NS
Wirral and West Chester Permo-Triassic Sandstone Aquifers	-	-	NS Minor during Construction and Operation	-	-	-	-	NS Minor during Construction	-	-	NS

Receptor	Biodiversity	Historic Environment	Water Environment	Landscape and Visual	Air Quality	Noise and Vibration	Traffic and Transport	Ground Conditions	Land Use	People and Communities	Major Accidents and Disasters
Manchester Ship Canal	-	NS	NS	S During construction and operation year 1		-	-	NS Minor during Construction	-	-	-
Human and Mineral Resource Receptors											
A5080	-	-	-	-	-	-	NS	-	NS	PS During Construction	-
Recreational Receptors											
National Cycle Route (NCR) 5	-	-	-	S During construction	-	-	-	-	NS	-	-
NCR 62	-	-	-	S During construction	-	-	-	-	NS	-	-
NCR 562	-	-	-	S During construction	-	-	-	-	NS	-	-
Trent and Mersey Canal Walk	NS Low during construction	-	-	S During construction	-	-	-	-	NS	-	-
Runcorn Golf Club	-	-	-	S During construction	-	-	-	-	S During construction	PS During Construction	-
Fiddlers Ferry (True Fit) Golf Course	-	-	-	S During construction	-	-	-	-	NS Minor during construction	PS During Construction	-

Receptor	Biodiversity	Historic Environment	Water Environment	Landscape and Visual	Air Quality	Noise and Vibration	Traffic and Transport	Ground Conditions	Land Use	People and Communities	Major Accidents and Disasters
Trans-Pennine walking trail	-	-	-	S During construction	-	-	-	-	NS	-	-
Bridgwater Way and Cheshire Ring Canal Walk	-	-	-	S During construction	-	-	-	-	NS	-	-
Sherdley Park Golf Course	-	-	-	NS	-	-	-	-	NS	PS During Construction	-
Recreational Cycle Route (RCR) 70	-	-	-	S During construction	-	-	-	-	NS	-	-
High Legh Park Golf Club	-	-	-	NS	-	-	-	-	NS Minor during Construction	PS During Construction	-
River Weaver	-	-	-	S During construction	-	-	-	-	NS	-	-
North Cheshire Way	-	-	-	S During construction	-	-	-	-	NS	-	-
Marbury Country Park	-	-	-	NS	-	-	-	-	NS Minor during Construction	-	-
Lower Walton	-	-	-	NS Minor during Construction	-	-	-	-	NS	-	-

Receptor	Biodiversity	Historic Environment	Water Environment	Landscape and Visual	Air Quality	Noise and Vibration	Traffic and Transport	Ground Conditions	Land Use	People and Communities	Major Accidents and Disasters
Dunham Woodhouses	-	-	-	S During construction and operation year 1	-	-	NS	-	-	-	-
Sherdley Park	NS	-	-	NS	-	-	-	-	-	-	-
Helsby Hill	NS	-	-	NS Minor during Construction	-	-	-	-	-	-	-
Sandiway Golf Club	-	-	-	S During construction	-	-	-	-	S During construction	PS During Construction	-
Human/Settlement Receptors											
Frodsham Town Centre and 6 Central Street Locations	-	-	-	-	NS	NS	-	NS Minor during Construction	-	PS During Construction towards travel needs S During Construction and Operation towards general public	-
Manchester Road, between Monmouth Close and Dam Lane and M6 J21	-	-	-	-	NS	NS	-	NS Minor during Construction	-	PS During Construction towards travel needs S During Construction and Operation	-

Receptor	Biodiversity	Historic Environment	Water Environment	Landscape and Visual	Air Quality	Noise and Vibration	Traffic and Transport	Ground Conditions	Land Use	People and Communities	Major Accidents and Disasters
										towards general public	
Between M56 and A558, Ring O Bells and Delph Lane	-	-	-	-	NS	NS	-	NS Minor during Construction	-	PS During Construction towards travel needs S During Construction and Operation towards general public	-
Settlements and Air Quality measures between M60 J10 and J9	-	-	-	-	NS	NS	-	NS Minor during Construction	-	PS During Construction towards travel needs S During Construction and Operation towards general public	-

19.6.5 **Table 19.4** summarises the results of the preliminary intra-project effects assessment. At this stage, there is potential for significant intra-project effects on the following receptors:

- Runcorn Golf Club (during construction phase).
- Sandiway Golf Club (during construction phase).
- Fiddlers Ferry (True Fit) Golf Course (during construction phase).

19.6.6 Furthermore, there are some receptors in **Table 19.4** that have multiple minor impacts which could potentially accumulate to a higher significance, these being the following:

- Mersey Estuary SPA, Ramsar Site and SSSI (during construction phase).
- Ravenhead Ponds LWS (during construction phase).
- Pendlebury Brook (SJ493920-SJ515914) LWS (during construction phase).
- Moore Nature Reserve (LWS) (during construction and operation phase).
- Rows Wood (LWS) (during construction phase).
- Thatto Heath Meadows (LWS) (during construction phase).
- Sutton Manor (LWS) (during construction phase).
- Lower Mersey Basin and North Merseyside Permo-Triassic Sandstone Aquifers (during construction phase).
- Manchester and East Cheshire Permo-Triassic Sandstone Aquifers (during construction phase).
- Sankey and Glaze Carboniferous Aquifers (during construction phase).
- Weaver and Dane Quaternary Sand and Gravel Aquifers (during construction phase).
- Wirral and West Chester Permo-Triassic Sandstone Aquifers (during construction phase).
- High Legh Park Golf Club (during construction phase).
- Manchester Ship Canal (during construction phase).
- Frodsham Town Centre and 6 Central Street Locations (during construction phase).
- Manchester Road, between Monmouth Close and Dam Lane and M6 J21 (during construction phase).
- Between M56 and A558, Ring O Bells and Delph Lane (during construction phase).
- Settlements and Air Quality measures between M60 J10 and J9 (during construction phase).

- 19.6.7 Following statutory consultation and further evolution of the project design, the intra-project effects assessment will be updated, and a detailed assessment will be reported in the ES together with any environmental measures which would be implemented.
- 19.6.8 At the ES stage, where common receptors have been identified, the potential for significant intra-project effects to arise will be considered in detail and further narrative will be provided as to whether, for example, any additional mitigation could be introduced to potential significant effects.

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