

SCOPING OPINION

Application Site and Description of Development

Extension for sand and gravel extraction workings at Caversham Quarry (Phase C).

1. David L Walker Chartered Surveyors has requested a scoping opinion in a letter dated 24th July 2009.
2. The applicant, Lafarge Aggregates, is proposing to extend the existing quarrying operations at Caversham Quarry. The proposal would involve the extraction of 1.8 million tonnes of sand and gravel over a 12 year period. The proposed extraction rate would be approximately 150,000 tonnes per annum and mineral would be processed at the existing processing site south of Playhatch Road. Land would be progressively worked and inert fill would be imported for progressive restoration of the site. Restoration would be to high quality agricultural land.

Consultation Responses

County Ecologist

3. The EIA should consider the potential impacts of the development within the context of restoration plans already approved for permitted works on the site.

Landscape and Visual Impact

4. This chapter should involve close liaison with the consultants writing the ecology/ nature conservation/ biodiversity chapter, as proposed mitigation strategies and compensation/ enhancement measures may affect the resulting landscape and restoration scheme.
5. This chapter should cover the following:
 - Elements of the development and its construction, operation and decommissioning pertinent to the particular assessment topic
 - Planning context
 - Assessment methodology
 - Baseline conditions
 - Identification and evaluation of likely significant effects (including cumulative effects)

- Mitigation and enhancement
- Long-term management and monitoring

Planning Context

6. Planning policies and other documents relevant to this chapter include the following:

Southeast Plan

- CO1 Core Strategy
- CC8 Green Infrastructure
- C3 Areas of Outstanding Natural Beauty
- C4 Landscape and Countryside Management
- C7 The River Thames Corridor
- W14 Restoration

Oxfordshire County Council

- Oxfordshire Wildlife and Landscape Study (OWLS), available from <http://owls.oxfordshire.gov.uk>
- Rights of Way Improvement Plan, available from <http://www.oxfordshire.gov.uk>.

South Oxfordshire District Council

- South Oxfordshire Local Plan 2011
- South Oxfordshire Landscape Assessment
- South Oxfordshire Design Guide

Baseline conditions

7. A landscape character assessment, considered within the context of South Oxfordshire landscape character assessment and the Oxfordshire Wildlife and Landscape Study (accessible from <http://owls.oxfordshire.gov.uk/>) should be carried out.
8. Landscape features (listed below) within the development site should be identified.
- Hedgerows
 - Trees (juvenile, mature, and veteran)
 - Watercourses (streams and ditches)
 - Small woodlands
 - Linear features
 - Field boundaries

Assessment methodology

9. Landscape Character Assessment (LCA) should be carried out based on the good practice guidelines produced jointly by the Landscape Institute and Institute of Environmental Assessment in 2002.

Mitigation and enhancement

10. Landscape planting schemes for enhancement and mitigation should be agreed in discussion with the ecological consultants, Oxfordshire County Council ecologist and following guidance from the Oxfordshire Wildlife and Landscape Study (OWLS) to ensure they are appropriate to the area.
11. Proposed planting schemes should include:
 - Species (characteristic of the area)
 - Sizes
 - Planting distances
 - Design layout

Restoration Scheme

12. The restoration scheme should include mitigation, compensation and opportunities for improvements for landscape, biodiversity and public access.

Ecology/ Nature Conservation/ Biodiversity

13. This chapter should also involve close liaison with the consultants writing the landscape and visual chapter, as proposed mitigation strategies and compensation/ enhancement measures will affect the resulting landscape and restoration scheme.
14. This chapter should cover the following:

- Elements of the development and its construction, operation and decommissioning pertinent to the particular assessment topic
- Planning context
- Assessment methodology
- Baseline conditions
- Identification and evaluation of likely significant effects (including cumulative effects)
- Mitigation and enhancement
- Long-term management and monitoring

Planning Context

15. Planning policies, legislation and other documents relevant to this chapter include the following:

European

- o Conservation (Natural Habitats, & c) Regulations, as amended

UK

- o Countryside and Rights of Way Act
- o Wildlife and Countryside Act
- o Badger Act
- o PPS9

SE Region

- o South East plan policy NRM5: Conservation and improvement of biodiversity
- o South East plan policy CC8: Green Infrastructure
- o South East plan policy W14: Restoration

Local planning guidance - Oxfordshire County Council

- o Planning and Biodiversity guidance document available from <http://www.oxfordshire.gov.uk>
- o Oxfordshire Wildlife and Landscape Study (OWLS), available from <http://owls.oxfordshire.gov.uk>
- o Conservation Target Areas Report, available from <http://www.oxfordshire.gov.uk>

Local planning guidance - South Oxfordshire District Council

South Oxfordshire Local Plan 2011
South Oxfordshire Landscape Assessment
South Oxfordshire Design Guide

Baseline Conditions

16. The EIA should identify protected or priority species, designated sites, important habitats or other biodiversity features on or adjacent to the development site. Desk study information is available from the Thames Valley Environmental Records Centre (<http://www.tverc.org/>). Habitat and species surveys should be carried out by suitably qualified personnel. A list of ecological consultants is available on the IEEM website (www.ieem.net).

2km radius of proposed development site

- Desk study data search

500m radius of proposed development site

- Extended phase 1 habitat survey.
- Scoping survey for potential habitat for protected species, species of conservation concern, rare and notable species and UK Biodiversity Action Plan (UKBAP) species.

- Full survey for protected species, species of conservation concern, rare and notable species and UK Biodiversity Action Plan (UKBAP) species where potential habitat has been identified.
- Landscape features.

Identification and evaluation of likely significant effects

17. All ecological reports should include the following:
- a) What biodiversity is present
 - b) How biodiversity impacts can be avoided
 - c) If it is not possible to avoid impacts, how they can be mitigated
 - d) If there is no way of mitigating impacts, compensation measures should be identified
 - e) How the application can result in overall enhancement in biodiversity

Mitigation and enhancement

18. Any disturbance to species and/or loss of habitat should be minimised through appropriate location and timing of works.
19. If any protected species are found, a mitigation strategy will need to be prepared and submitted in discussion with Natural England and Oxfordshire County Council and it may be necessary for the applicant to obtain a licence from Natural England. This will need to be done before any planning decision is taken.
20. Mitigation strategies for any other protected species, species of conservation concern, rare and notable species or UK BAP species that could be potentially impacted by the development will be needed.
21. Any impacts of the development which cannot be minimized to a negligible level through mitigation will need to be compensated for. This could be via on and/or off site enhancement of existing biodiversity resources and/or the creation of new habitat. The type of compensatory habitat should be appropriate to the surrounding habitat and species present in the area. The biodiversity strategy and guidelines outlined on the OWLS website could be used as guidance for the enhancement of ecological areas and their future management.

Long-term management and monitoring

22. Provision should be made for the long term management (20 years over and above the standard 5 year after-care period) of any green space, particularly for habitat and/or species for which mitigation or compensation/enhancement measures have been proposed and/or land being restored for amenity/nature conservation purposes.
23. The EIA should include head of terms for a management plan with the full management plan to be submitted in year 4 of the 5 year after-care, to be agreed by Oxfordshire County Council in discussion with the relevant nature

conservation bodies. The costs of implementing the plan should also be secured through a S106 agreement, possibly through a commuted sum set aside for that purpose. This sum should cover the costs of annual monitoring and an annual review of the management plan for the entire site (not just for protected species) in addition to the work itself.

24. Responsibility for carrying out the review of the management plan and the management work itself will need to be taken by an individual or group of individuals, as agreed by the developer and Oxfordshire County Council in discussion with the relevant nature conservation bodies.
25. Continuous monitoring will be needed to determine the actual impacts of the development on the biodiversity of the site. Monitoring should also provide information on the success of the mitigation strategies implemented for the protected species and feed into the management plan to allow it to be altered as necessary.
26. A single plan for management and monitoring of both biodiversity and landscape elements of the development would be sensible to minimise resource expenditure and ensure cohesion between landscape and biodiversity requirements.

Transport Development Control:

27. Paragraph 2.15 of the Scoping Opinion Request Letter indicates that a Traffic Impact Assessment will be undertaken. The LHA requests that the applicant complete a Transport Assessment in accordance with the guidance set out in the CLG/DfT document 'Guidance on Transport Assessments'. The applicant should also arrange a Scoping meeting with the LHA to scope out the required content of the TA in advance of submission of their planning application.
28. I am aware that my colleagues in the Bridges Team have been in discussions with Lafarge Aggregates and their engineers concerning their proposal to construct an aggregate conveyor over the B478 Playhatch Rd near Sonning Common and that they have agreed to sign off the Approval in Principle document (AIP). Reference should be made to these discussions in the applicant's planning application submission.

Natural England:

29. Thank you for your letter of 28th August 2009 regarding the above. Recent case law¹ and guidance from the Office of the Deputy Prime Minister² has stressed the need for a full set of environmental information to be available for consideration prior to a decision being taken on whether or not to grant planning permission. Natural England therefore advises that the Environmental Impact Assessment (EIA) should give full consideration to:

1. Landscape Character and Designated Areas

30. To ensure that the proposed scheme does not adversely affect the character of the surrounding countryside, we recommend that consideration should be given to the following aspects in the environmental impact assessment:

- The potential impact of the scheme on the landscape character and visual amenity of the surrounding area.
- The detailed design of the proposed improvements should seek to respect and enhance local character and distinctiveness, and use appropriate materials and designs in all new built features.
- The development site is adjacent to the following designated area:

Chilterns Area of Outstanding Natural Beauty (AONB):

31. Any development taking place within a nationally designated landscape is expected to be of the highest quality, which should respect, maintain, or enhance, local landscape character or distinctiveness.

32. Natural England is concerned over the potential effect of this development on the natural beauty, local character and distinctiveness of the AONB and the Environmental Statement should include a full assessment of these effects. Full regard should be paid to the Chilterns AONB Management Plan for detailed guidance on ways in which landscape character and local distinctiveness can be preserved and how this development can be improved so that it is 'good enough to approve'.

33. We suggest that you also consult the AONB Unit, if you have not done so already, in order to ensure that planning issues regarding this proposal take into account the various issues that arise as a result of the AONB designation.

Landscape and visual impacts

34. Natural England would wish to see details regarding local landscape character areas mapped at a scale appropriate to the development site and any relevant management plans or strategies pertaining to the area. The EIA should include assessments of visual effects on the surrounding area and landscape together with any physical effects on the development, such as changes in topography.

35. The EIA should include a full assessment of the potential impacts of the development on local landscape character using landscape assessment methodologies. We strongly advocate the use of Landscape Character Assessment (LCA), based on the good practice guidelines produced jointly by the Landscape Institute and Institute of Environmental Assessment in 2002.

36. LCA provides a sound basis for guiding, informing and understanding the ability of any location to accommodate change and to make positive proposals for conserving, enhancing or regenerating character, as detailed proposals are developed. Guidance on LCA, published by the Countryside Agency and Scottish Natural Heritage, is available at:

http://www.countryside.gov.uk/LAR/Landscape/CC/landscape_character_assessment.asp.

37. In order to foster high quality development that respects, maintains, or enhances, local landscape character and distinctiveness, Natural England would encourage all new development to consider the character and distinctiveness of the area, with the design and outlay of all elements of a proposed development reflecting local design characteristics and wherever possible using local materials.
38. The Environment Impact Assessment process should detail the measures to be taken to ensure the building design will be of a high standard, as well as detail of layout alternatives together with justification of the selected option in terms of landscape impact and benefit.

2. Access and Recreation

39. Natural England would encourage any proposal to incorporate measures to help encourage people to access the countryside for quiet enjoyment. Measures such as reinstating existing footpaths together with the creation of new footpaths and bridleways are to be encouraged. Links to other green networks or urban fringe areas should also be explored to help promote the creation of a wider green infrastructure. To this end, relevant green infrastructure strategies put in place by local authorities should be incorporated where appropriate.

3. National Trails

40. The development site is adjacent to and has the potential to impact upon the Thames Path National Trail, a priority area for Natural England. As this is a walking route, consideration should also be given to providing rest areas for all pedestrians, accessible by all users regardless of their levels of mobility. Consideration of improved viewing areas would also be welcomed such as ramped or raised viewing platforms, helping to enhance and improve the experience of the National Trail.
41. Potential impacts on access land, public open land and rights of way should be fully considered and Natural England recommends that this development proposal give serious consideration towards the potential impacts on the Thames

Path National Trail. The National Trails website www.nationaltrail.co.uk provides information including contact details for the National Trail Officer.

4. Agriculture and soil issues

42. We are pleased to note that the applicant already has a soil and Agricultural Land Classification survey of the proposed application area. The following issues relating to agriculture and soils should be considered in detail in the Environmental Statement.
43. The soil survey and agricultural land classification of the land should be at a detailed level, e.g. at least 1 auger boring per hectare, supported by pits dug in each main soil type to confirm the soil physical characteristics of the full depth of soil resource, i.e. 1.2 metres.
- Proposals for handling different types of topsoil and subsoil and the storage of soils and their management whilst in store.
 - Reference could usefully be made to Sheets 1-4 of MAFF's Good Practice Guide for Handling Soils when deciding on the machinery and method of its use for handling soils. (www.defra.gov.uk/farm/environment/land-use/soilguid/index.htm).
 - The method of assessing whether soils are in a suitably dry condition to be handled (i.e. dry and friable).
 - The proposed restored soil profiles to a depth of 1.2 m.
 - Effects on farm structure and viability.
 - Effects on land drainage, agricultural access and water supplies, including of other agricultural land in the area.
 - The proposed restored landform, including details of the contours, water table and the availability of a drainage outfall should the restored land require under-draining.

5. Local Wildlife Sites

44. Our records indicate that the development site is in close proximity to the following Local Wildlife Sites:
- Shiplake Marsh
 - Warren Wood
45. Local Wildlife Sites are identified by the County ecologist and are of county importance for wildlife. The Environmental Statement should therefore include an

assessment of the likely impacts on the wildlife interests of the sites identified above. The assessment should include proposals for mitigation of any impacts and if appropriate, compensation measures. Contact the County ecologist for further information.

6. Species protected by the Wildlife and Countryside Act 1981 (as amended) and by the Conservation (Natural Habitats &c.) Regulations 1994 (as amended).

46. We strongly recommend that surveys for protected species (including, for example, great crested newts, reptiles, water voles, badgers and bats) should be carried out within the area affected by the development.
47. If any protected species are found the Environmental Statement should include details of:
 - The species concerned;
 - The population level at the site affected by the proposal;
 - The direct and indirect effects of the development upon that species;
 - Full details of any mitigation or compensation that might be required;
 - Whether the impact is acceptable and/or licensable.
48. In order to provide this information there may be a requirement for a survey at a particular time of year. Surveys should always be carried out by suitably qualified and where necessary, licensed, consultants.
49. The great crested newt, dormouse and all species of bats are European protected species such that it is illegal to intentionally kill, injure or otherwise disturb them. If any of these species are found to be present you should also consult Natural England's Wildlife Management and Licensing Unit in Bristol (Tel. 0845 6014523) about licensing implications before any work can proceed.

7. Other features of nature conservation interest, e.g. habitats and species identified within the UK and South East Region Biodiversity Action Plans.

50. Natural England advises that a habitat survey (analogous to Phase 2) is carried out on the site, in order to identify any important habitats present. In addition, ornithological, botanical and invertebrate surveys should be carried out at appropriate times in the year, to establish whether any scarce or priority species are present. The Environmental Statement should include details of:

- Any historical data for the site affected by the proposal (e.g. from previous surveys);
- Additional surveys carried out as part of this proposal;
- The habitats and species present;
- The status of these habitats and species (e.g. whether BAP priority habitat);
- The direct and indirect effects of the development upon those habitats and species;
- Full details of any mitigation or compensation that might be required.

51. The development should avoid adversely impacting the most important wildlife areas within the site, and should if possible provide opportunities for overall wildlife gain.

8. Cumulative and in-combination effects.

52. The EIA should include an impact assessment to identify, describe and evaluate the effects that are likely to result from the project in combination with other projects and activities that are being, have been or will be carried out. To carry out the assessment of cumulative and in-combination effects, the following types of projects should be included. (Subject to the availability of information):

- a. Existing completed projects
- b. Approved but uncompleted projects
- c. Ongoing activities
- d. Plans or projects for which an application has been made and which are under consideration by the consenting authorities
- e. Plans and projects which are reasonably foreseeable, i.e. projects for which an application has not yet been submitted, but which are likely to progress before completion of the development and for which sufficient information is available to assess the likelihood of cumulative and in-combination effects.

Environment Agency

53. We have reviewed the Scoping Opinion for extension for sand and gravel extraction workings to Caversham Quarry (Phase C) prepared by David L Walker Limited dated 24 July 2009 and have the following comments to make which

should be included within the Environmental Impact Assessment (EIA).

54. For clarity I will divide my response into the following headings:
- Sequential Test
 - Drainage and Flood Risk
 - Groundwater and Contaminated Land
 - Nature Conservation

Sequential Test

55. The proposed site lies within the 1 in 5 year floodplain of the River Thames and the Berrys Brook. This area is therefore defined as Flood Zone 3b (Functional Floodplain) within Table D.3 of Planning Policy Statement 25: 'Development and Flood Risk' (PPS25). Whilst the proposed works are defined as 'Water Compatible' Use PPS25 advise that the Sequential Test should be carried out for this extension.
56. The scope of the test should be agreed between yourselves and the applicant and the required level of evidence to allow you to undertake the test should be submitted by the applicant to support the application.

Flood Risk and Drainage

57. Referring to Paragraph 2.11, the applicant states they will carry out a Flood Risk Assessment in accordance with PPS25. In addition to this the applicant should also refer to the Oxfordshire County Council Strategic Flood Risk Assessment (SFRA) for Minerals and Waste within the Oxfordshire County and the South Oxfordshire Strategic Flood Risk Assessment.
58. Within the section of Hydrology and Hydrogeology the impacts on all sources of flooding should be considered including fluvial, surface water, overland flows and groundwater. Whilst there may be no evidence of groundwater flooding the impact the extraction may have on groundwater flows should be assessed and covered in more detail within the flood risk assessment.
59. **We urge the applicant to aim to achieve an overall reduction in flood risk where possible. This could be achieved by providing additional flood storage during the works and as part of the Restoration Phase.**
60. In terms of restoration we will require that there should be no raising of pre-extraction ground levels and will seek river enhancement where possible.
61. We would strongly encourage the applicant to consult with us on their flood risk assessment prior to a formal submission.

62. We will need the following demonstrated within the FRA: increase in flood risk to the site and the surrounding area. The residential area of Sonning Eye is within close proximity to the proposed works which has historically flooded.
63. Any proposed access roads should be at grade with existing ground levels. If this is not technically possible appropriate level for level flood storage compensation should be provided.
64. Any proposed noise bunds should be sited in the lowest area of flood risk as possible and be spaced a minimum of 20m apart. The flood risk assessment should determine the location, length and orientation of the bunds. These will also require level for level compensation and an assessment of the impact on flood flows.
65. Any proposed boundaries i.e. the use of fencing should be a post and rail design to ensure free ingress and egress of flood flows.
66. The FRA should also include an assessment for surface water to ensure Greenfield run-off rates are maintained. Details of how surface water is to be disposed of should be included, considering a hierarchy approach of firstly infiltration where feasible. If this can not be achieved above ground sustainable drainage methods should be provided. The use of this method should be assessed in line with the fluvial flood risk as any above ground features may interact during a flood event.
67. The assessment should be carried out for all flood events up to and including the 1 in 100 year flood level, depending on the duration of the works, climate change should be added accordingly in line with Table B.2 within PPS25.
68. We hold more detailed flood modelled data which can be obtained from our External Relations Team. This can then be ordered from the External Relations team by emailing us at thwest@environment-agency.gov.uk. Information on other sources of flooding can also be obtained within the Oxfordshire County SFRA and South Oxfordshire SFRA.
69. Please note under the terms of the Water Resources Act 1991, and the Land Drainage Act 1991, the prior written consent of the Environment Agency is required for any proposed works or structures, in, under, over or within 8metres of the top of the bank of the Berrys Brook, designated a 'Main River'.
70. Erection of flow control structures or any culverting of a watercourse requires the prior written approval of the Environment Agency under s.23 of the Land Drainage Act 1991 or s.109 of the Water Resources Act 1991. The Environment Agency resists culverting on flood risk, nature conservation and other grounds and consent for such works will not normally be granted except for access crossings.

71. Further information on SUDS can be found in:
- PPS25 page 33 Annex F
 - PPS25 Practice Guide
 - CIRIA C522 document Sustainable Drainage Systems-design manual for England and Wales
 - CIRIA C697 document SUDS manual
 - the Interim Code of Practice for Sustainable Drainage Systems. The Interim Code of Practice provides advice on design, adoption and maintenance issues and a full overview of other technical guidance on SUDS.
72. The Interim Code of Practice is available on both the Environment Agency's website: <http://www.environment-agency.gov.uk> and CIRIA's website: www.ciria.org.uk

Groundwater and Contaminated Land

73. In addition to what has been outlined in the scoping opinion we would request that the following is assessed within the Environmental Impact Assessment (EIA):
- 2 years of monitoring data for groundwater levels for around and within the site should be included in the EIA as an environmental baseline for the development.
 - Impacts of dewatering - If carried out, dewatering the proposed site may lower groundwater levels locally and may derogate nearby domestic and licensed groundwater sources or impact local water bodies such as rivers or lakes. The EIA will need to identify these possible receptors and assess these likely impacts. Certain private water supplies do not require a licence, therefore the Environment Agency is not necessarily aware of their existence. The locations of private domestic sources may be held by the local authority on the register required by the Private Water Supplies Regulations 1992 and should be identified within the EIA. Please note that the current licensing exemption on dewatering is likely to be removed in October 2009 after which dewatering activities will be brought into regulation by the Environment Agency
 - Hydrogeological assessment of the operation and the restoration of the site and the impacts on water resources should be assessed separately as both of these activities will have different impacts.
74. We have request the above as developers proposing schemes that pose a risk to groundwater resources, quality or abstractions must provide an acceptable hydrogeological risk assessment (HRA) to us and the planning authority. Any activities that can adversely affect groundwater must be considered including physical disturbance of the aquifer. If the HRA identifies unacceptable risks then the developer must provide appropriate mitigation.

75. You may find the following guidance published by the Environment Agency and available on our website useful in carrying out the EIA.
- Hydrogeological impact appraisal for dewatering abstractions Science Report – SC040020/SR1
 - Environmental Impact Assessment in relation to Water Resources Authorisations Guidance on the requirements and procedures

Nature Conservation

76. The application should be submitted with full ecological assessment as suggested in the letter from David L Walker limited, dated 24/07/09. A full phase 1 habitats survey, as well as a protected species should be provided.
77. With regards to working near watercourses, where they are designated as 'Main River' the applicant should provide a minimum of a 16m buffer area between the workings and top of bank of the watercourse in accordance with Byelaw 6 of the Thames Region Land Drainage Byelaws 1981. The Berrys Brook is classified as 'Main River' and there should be no activity in the buffer strips. Ideally this exclusion zone should be fenced off for the duration of the workings.
78. The smaller ditch that runs through the site should also be protected and retained by a minimum of 8m buffer strip, in which there should be no activity. Ideally this exclusion zone should be fenced off for the duration of the workings.
79. These buffer zones are necessary to protect the river from disturbance, reduce the potential of pollution, and protect the important riparian corridors that are fundamental to the presence and movement of species through the landscape.
80. Consideration should be given to improving the habitat within the Berry Brook. A habitat assessment of this watercourse will identify steps that could be taken to increase the biodiversity interest.
81. The design and management of the wetlands to be included in the restoration scheme should be provided and agreed before any work commences on site.
82. An ecological management plan should be provided which sets out the key objectives of the habitat creation and how this habitat will be managed in the future. This should include sensitive management of the Berry brook and the associated ditches on site. The plan should also set out how any sensitive features identified in the ecological assessment can be protected during operations and/or mitigated for in the restoration proposals.
83. Should any discharges to controlled water be envisaged these should be included. Due to the proximity of the site to Thames and Tributaries all works carried out in connection with this development should comply with Environment

Agency pollution prevention guidelines (PPG5): 'Works and maintenance in or near water'. Copies and further information are available from your local Agency office or from www.environment-agency.gov.uk/ppg.

Archaeology

84. The potential application area contains a number of archaeological features, mostly identifiable through aerial photography as crop marks. These include a prehistoric barrow cemetery. There are several discernable barrows, some of which may be unusual barrow types with possible internal features. We do not know the full extent or state of preservation of the cemetery but it is potentially of national importance.
85. The applicant has provided us with an archaeological desk based assessment of the area. Whilst it includes all the known archaeological features within it significantly underplays the importance of the barrow cemetery. This is also apparent in section 2.20 of the scoping opinion document. Both the desk based assessment and the scoping document should be amended to recognise this.
86. Also the desk based assessment does not include an accurate rectified plot of the crop mark evidence, using both vertical and oblique photographic coverage. This is an important omission. We have informed the applicant that a full aerial survey, including rectified plotting should be undertaken since in the event of an application being made we would require this as part of a submitted desk based assessment. Given the potential importance of the site we will require geophysical survey and archaeological evaluation to determine the extent, level of preservation and importance of the site. The aerial survey will form part of the non invasive part of the assessment. The applicant refers to this in section 2.21.
87. Given that the applicant has recognised and stated a willingness to undertake further assessment and evaluation then we are essentially satisfied with this document and its content. Our only concern is that the deskbased assessment and section 2.20 understate the potential importance of the barrow cemetery. This should be corrected.

Vale of White Horse Planning

88. The accompanying information prepared by David L Walker Limited identifies the possible environmental impacts and provides details of how these will be investigated. South Oxfordshire District Council is satisfied with the broad outline of the Environmental Statement and does not wish to request that any further information is included at this stage.

Assessment

89. The Environmental Statement must assess potentially significant impacts at all stages of the development including construction and operational phases.

90. The following topic areas were proposed in the Scoping Report submitted by David L Walker Environmental Consultants:
- **Ecology;**
 - **Soil resources;**
 - **Landscape and visual impact;**
 - **Traffic;**
 - **Noise;**
 - **Hydrology and hydrogeology; and**
 - **Cultural heritage.**
91. Oxfordshire County Council can confirm that it considers that these topics must be considered in the Environmental Impact Assessment. In particular any Environmental Statement submitted should include detailed assessments as set out in the consultation responses.
92. In addition to this, climate change should be addressed as a topic in its own right, and the issues addressed in Planning Policy Statement - Planning and Climate Change Supplement to Planning Policy Statement 1, should be covered.
93. The landscape and visual impact chapter should include a landscape character assessment. This should include, amongst other criteria defined by the County Ecologist above, landscape planting scheme for enhancement and mitigation. The development site is adjacent to the Chilterns AONB and as such full consultation should be taken with the AONB unit.
94. The ecology chapter should include a full ecological and wildlife assessment in line with the comments of the County Ecologist and Natural England alongside adequate mitigation strategies. Protected species surveys should be undertaken in the EIA.
95. The ecology chapter should also include an in-combination impact assessment that may result from other projects or activities that are being, have been, or will be carried out.
96. The traffic chapter should incorporate a Transport Assessment in accordance with the guidance set out in the CLG/DfT document "Guidance on Transport Assessments".
97. The chapter on hydrology and hydrogeology should include a full Flood Risk Assessment alongside the Oxfordshire County Council Strategic Flood Risk Assessment and South Oxfordshire Strategic Flood Risk Assessment. The impacts on all sources of flooding should be considered. This chapter should also include a comprehensive groundwater monitoring strategy.

98. The archaeology chapter should be amended to reflect the importance of the Barrow cemetery.
99. Mitigation measures should be described for the identified significant impacts. An assessment of the effectiveness of the mitigation measures should also be included.
100. Other impacts that are not considered to be significant will not need to be assessed to the same level of detail as the impacts identified above. However, some detail will be required to indicate that they have been considered and why they are not considered to be significant. Mitigation measures should also be identified.
101. The Environmental Statement should cover the whole site, including all ancillary development.
102. The potential impacts and any mitigation measures will be assessed against the policies in the development plan. The development plan consists of:
 - National Policy (PPS etc)
 - The South East Plan 2009
 - Oxfordshire Structure Plan 2016 (Saved policies T7, H2, M2).
 - Oxfordshire Minerals and Waste Local Plan 1996 (Saved Policies as listed in the Secretary of States Direction dated 25th September 2007).
 - South Oxfordshire Local Plan 2011 (Saved policies from 20th January 2009).
103. Other documents, such as those listed in the consultation responses, may also be relevant to particular impacts and may therefore be used in the consideration of the proposal.
104. The Environmental Statement should be submitted as a separate document from the planning application and would need to include the information as set out in Parts I and II of Schedule 4 of the Town and Country Planning (Environmental Impact Assessment) (England and Wales) Regulations 1999. Please find attached document in Annex 1.
105. Provided that the above information is included, Oxfordshire County Council considers that the Environmental Statement would sufficiently cover the necessary information for inclusion in an Environmental Impact Assessment. However EIA is an iterative process that allows the development proposal to be continually refined. Therefore further information may be required at a later stage.

Signed *James Hine* (Case Officer)
Date *22 October 09*
Approved by *L. Hewitt* (Officer)
On behalf of the Director for Environment & Economy
Date *22 OCTOBER '09*

INFORMATION TO BE INCLUDED IN AN ENVIRONMENTAL STATEMENT

Town and Country Planning (Environmental Impact Assessment) (England and Wales) Regulations 1999.

Under the definition in Regulation 2 (1), 'environmental statement' means a statement:

- (a) that includes such of the information referred to in Part I of Schedule 4 as is reasonably required to assess the environmental effects of the development and which the applicant can, having regard in particular to current knowledge and methods of assessment, reasonably be required to compile, but
- (b) that includes at least the information referred to in Part II of Schedule 4.

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.

