

Date: 26th April 2022

Our ref: R3.0138/21

**County Hall
New Road
Oxford
OX1 1ND**

**Bill Cotton
Corporate Director for
Environment and Place**

Mr Jonathan Hill
AECOM

Sent by email

Dear Jonathan,

- The dualling of the A4130 carriageway (A4130 Widening) from the Milton Gate Junction eastwards, including the construction of three roundabouts;
- A road bridge over the Great Western Mainline (Didcot Science Bridge) and realignment of the A4130 north east of the proposed road bridge including the relocation of a lagoon;
- Construction of a new road between Didcot and Culham (Didcot to Culham River Crossing) including the construction of three roundabouts, a road bridge over the Appleford railway sidings and road bridge over the River Thames;
- Construction of a new road between the B4015 and A415 (Clifton Hampden bypass), including the provision of one roundabout and associated junctions; and
- Controlled crossings, footways and cycleways, landscaping, lighting, noise barriers and sustainable drainage systems.

At a linear site comprising a corridor between the A34 Milton Interchange and the B4015 north of Clifton Hampden including part of the A4130 east of the A34 Milton Interchange, land between Didcot and the former Didcot A Power Station and the Great Western Mainline, land to the north of Didcot where it crosses a private railway sidings and the River Thames to the west of Appleford-on-Thames before joining the A415 west of Culham Station, land to the south of Culham Science Centre through to a connection with the B4015 north of Clifton Hampden

Further information required to support planning application and under Regulation 25 of the Town and Country Planning (Environmental Impact Assessment) Regulations 2017

The formal consultation period on the above planning application has ended and we have received comments from a range of consultees. Copies of these have already been provided to you and they are available to view on our website. In order to determine the application, the LPA requires additional and amended information, which includes further environmental information in respect of the Environmental Statement which would fall under the provisions of the Town and Country Planning (Environmental Impact Assessment) Regulations 2017 (The 'EIA Regulations'). This letter sets out the information which is required.

This letter should be read alongside the detailed responses received from statutory and non-statutory consultees, and other interested parties who have made comments on the application as this letter is not intended to repeat those in full. Many of the comments received have commented on and/or expressed concerns about the proposed development that may have implications for how it is assessed against development plan policies and other material considerations and you should seek to take this opportunity to address them accordingly through amendments and additional information to be submitted.

Further Information Required:

Further information is required in relation to:

- General information about the development
- Design
- Highways and Travel
- Climate and Sustainability
- Flooding & Drainage
- Heritage
- Landscaping & Visual Impacts
- Arboriculture
- Biodiversity
- Air Quality
- Noise
- Agriculture/soils
- Minerals and Waste
- Recreation
- Utilities
- Cumulative Impacts

The detail is set out below. Please provide the following information.

General Information

- Extended cross sections are required at key locations to show the scheme in context with surroundings. These cross sections should include, but not necessarily be limited to:
 - A4130 widening
 - Science Bridge
 - RWE site and relocated lagoon
 - Appleford Level Crossing incorporating Level Crossing Cottage
 - Properties to the north of Clifton Hampden, including Woodfield House and Home Farm House
 - Culham Science Centre Roundabout, including its relationship with Culham Station House and Tobet on Station Road
 - Fullamoor House and Barns
 - The access to The Coppice House and The Old Stables at the junction between the proposed development and B4015
- Please provide long sections of the scheme.
- The General Arrangement (GA) drawings include a number of “indicative” and/or “future/delivered by 3rd party” elements to the scheme. Other drawings included within supporting documentation refer to the red line as being ‘indicative’. As the application seeks full permission, the drawings must clearly show what is being applied for and what isn’t. Text boxes can be used within the drawings to provide context where necessary, however junctions etc should only be shown as part the development where they are existing, permitted but not yet delivered (and labelled as such), or where they form part of the planning application being considered.
- Similarly, there are a number of occasions throughout the application documents and ES where reference is made to additional information that would become available at the ‘detailed design stage’. Given the planning application is for full planning permission, please can it be clarified what is meant by the ‘detailed design stage’ and how this may affect any of the proposed development and any planning permission granted.
- There are a number of errors/inconsistencies in the drawings (including keys) and submitted documents, many of which have been referred to in comments from statutory and non-statutory consultees. Please ensure that all drawings are accurate and consistent to avoid any delays in the determination process.

- The application documents do not appear to include an elevational drawing showing the full length of the Appleford Sidings Bridge and the proposed noise barrier. Please provide this drawing.
- Clarification is sought about the impact on the RWE site. Specifically, it is not clear from the application documents what is and isn't included in the application and what the impact on the RWE operation would be from the proposed development in isolation (i.e. without third party developments that may or may not happen in the future) both during the construction period and during operations. Please provide detailed drawings of this part of the site, including drawings and cross sections to show the proposed new lagoon in context with the surrounding area along with information about the construction methodology including programme, roles/responsibilities for delivery, and details of the fill and restoration proposals for the existing lagoon.
- Clarification is also sought on the impact to ponds and settlement lagoons in the Didcot to Culham river crossing section of the scheme. The Design and Access Statement (DAS) indicates that some ponds/lagoons are to be partially infilled as part of the development but no details have been provided. Please provide drawings to show what is new, retained and removed with cross sections and details of infilling and restoration where appropriate.
- Paragraph 5.81 of Chapter 5 of the Environmental Statement states that public information events were planned for the first two weeks following submission of the planning application, which it is understood did not occur. Please amend and clarify the steps taken to inform interested parties about the application submission and details of the development.

Design

- Please review the comments received from South Oxfordshire District Council and the Vale of White Horse District Council regarding the Didcot Garden Town Delivery Plan (DGTDP), which is a material planning consideration. In particular, it is not obvious how the development responds to the aspiration to create a spectacular arrival experience to the Garden Town and for Science Bridge to be designed in such a way that it is a landmark scheme. Please review the design of this part of the scheme and the Science Bridge structure in response to those comments and provide commentary on how the final design responds to the DGTDP.
- Many comments have been received which criticise the design of the Appleford Sidings Bridge. Specifically, there is concern that it is over-engineered and that it would have unnecessary landscape, visual and amenity effects as a result of its height, bulk and materials. Please review the design of this structure in response to those comments and provide commentary on how the final design is the best option in this location.
- Please clarify whether the proposal includes provision for public art and the options that have been considered to include public art within the scheme.

Highways & Travel

- Please provide swept path analysis across the scheme for a coach measuring 15m in length.
- There is a risk of vehicle conflict on the Abingdon Roundabout because the three-lane layout is currently proposed on only part of the roundabout. This needs to be resolved through a revised layout of the roundabout (GA Plan 14), unless clarification is provided to resolve this concern. Please see comments from the Transport Development Control officer for detail on this point.
- The traffic modelling that has underpinned the ES, including the assessment of alternatives, climate change, air quality and noise chapters, concludes that the highway network would reach gridlock before the future assessment year of 2039. Please provide further information to justify that the modelling remains robust given the changes to work and travel patterns that have emerged during and are anticipated post the Covid-19 pandemic.

- Please provide further information to justify how the application assesses the impact of the scheme on the highway network within Abingdon Town Centre given that the Paramics Model stops just to the west of the existing Culham River Crossing and no further junction capacity modelling has been done for any of the junctions in the centre of Abingdon. Whilst the priority would be to encourage modal shift rather than increasing capacity for vehicles within Abingdon, justification is needed to explain why no assessment has been done on the impacts on Abingdon given that there are existing queues back onto the A415 into Abingdon. Further information is needed to explain if those queues would remain or change as a result of the proposed development and if there would be a net increase in vehicles travelling north along the A415 to Abingdon in the future year.
- The submitted drawings appear to show that the existing central refuge island on the A415 to the east of Culham Station would be removed as part of the development. This island provides a valuable crossing point for pedestrians and cyclists accessing the railway station from dwellings and routes to the south of the A415. The loss of this island may discourage active travel options to the station, particularly given the alternative route would appear to be indirect and longer in length for the majority of users. Please consider reviewing this aspect of the proposal to ensure that active modes of travel are prioritised over the use of the private car.
- Further contextual information is required to explain the inter-relationship between the proposed development and other existing/planned highway developments in the local area, including but not necessarily limited to proposals at Golden Balls and in Sutton Courtenay. Reference should also be made to proposals for walking, cycling and public transport plans for the local area and the inter-relationship between these and the proposed development.
- Clarification is required to explain what/if any impact there would be to the functioning of Appleford Level Crossing as a result of the proposed development, along with details of any mitigation measures required to reduce and manage the impact as appropriate.
- Network Rail has raised concerns that changes to traffic and pedestrian flows along the A415 may have impacts to the structural integrity of the Didcot to Oxford Mainline crossing and the adjoining minor road bridge to the south of Culham Station. Please respond to these concerns.
- Detailed stand-alone or inset drawings are required to demonstrate the proposed access arrangements to a number of properties and sites during the construction process and on completion of the development as this is not currently clear. These accesses are:
 - Sutton Courtenay Minerals and Waste Complex (FCC & Hanson), including information about how the severance of the link between the site and Appleford Level Crossing would affect access and operations.
 - Hill Farm, noting that access arrangements on the plan are labelled as 'to be confirmed' on drawing GA8.
 - J James Ltd Pallets & Recycling, noting that drawing GA8 doesn't appear to show an access to the property, but rather a link to a potential future development area from which access would be delivered by a third party.
 - Level Crossing Cottage.
 - Fullamoor Farmhouse and Barns, noting that no access from the 'old A415' into these properties is shown on drawing GA16.

Whilst it is understood that the access arrangements to some of these properties are likely to change as a result of third-party development, the application needs to demonstrate that it would enable continued and uninterrupted access to these dwellings and businesses throughout the construction and operational periods without reliance on third parties.

- A revised GA3 drawing is required to show an additional maintenance bay at the Old A4130 Roundabout
- A revised GA15 drawing is required to show a minimum of 6 metres between the give way line and the toe of the ramp to the raised crossing at Zouch Farm Bed & Breakfast.

- Clarification is required to explain if and how the Transport Assessment (TA) has accounted for the permitted operations at the former Didcot A Power Station site in response to the concerns raised by RWE Generation UK. Please also review and respond to the comments made by RWE Generation UK with regard to the robustness of the assessment of the impact on the A4130/Science Bridge Junction

Climate Change & Sustainability

- Please clarify if and how the Climate Assessment has taken into account the potential for greenhouse gas emissions arising from induced demand for car travel and justify the approach taken.
- Please provide a Climate Change Position Statement which provides a summary of the measures embedded within the scheme to reduce climate effects as far as practicable along with details of additional measures that are proposed to be secured through condition if planning permission is granted in the interests of sustainable development. Reference should be made to the combined effects of travel behaviour, measures to reduce embodied carbon emissions and greenhouse gas emissions during the construction and operational phases, biodiversity enhancements and net gain, landscaping proposals, drainage and any other matters that affect the impact of the scheme on climate. The statement should also include the following:
 - Further information setting out how the development seeks to minimise the climate impacts of the development as far as is practicable.
 - Further information setting out how the development would contribute to the aims and objectives of the draft Oxfordshire Local Transport and Connectivity Plan, which is a material planning consideration, including the overarching vision to deliver a zero-carbon transport network by 2040.
 - Whilst it is welcomed that the proposal includes a segregated footway and cycleway along its length, it also increases capacity for private vehicles. Further information is therefore required to set out the measures the applicant intends to take and/or relies upon to encourage a modal shift from car travel to active and sustainable modes, and how these measures could be secured or relied upon as part of the planning application.
 - Further information to demonstrate how active and sustainable travel modes (including bus) are prioritised over the use of the private vehicle, particularly given the absence of dedicated bus lanes or other bus priority measures.
 - Further information about how the climate effects of the development would be monitored in the long term, and the measures that would be available to be taken by the applicant should the climate effects need managing/reducing in future. This could include physical alterations to the scheme and/or details of other powers available to the applicant (e.g. to restrict the use of the road to specific users or specific times etc).
- Please provide clarification as to whether the scheme has been assessed using the County Council's Climate Change Impact Assessment Tool and how the tool has informed the scheme development.

Flood, Drainage & Water Quality

- Further information and amendments to the proposal are required to show additional flood compensation measures to mitigate increases in flood risk beyond the tolerance levels set out in the modelling that underpins the Flood Risk Assessment (FRA), to address the Environment Agency's objection and noting their preference for level for level flood compensation. Analysis

should be presented in the FRA as a table showing the volumes lost to the development in approximately 100mm increments of level and the volumes gained by the mitigation proposed in the same level increments. It should be demonstrated that there is no loss of floodplain volume in any increment of level, and preferably a net gain. The FRA should consider whether level for level compensation is possible and if not explain why and detail how any associated risks from the chosen form of mitigation can be minimised. Flood compensation should be delivered within the red line area for the application. If this is not possible, further information will be required to demonstrate how the flood compensation will be secured and the mechanism and timetable for delivery.

- The proposed flood compensation area on the northern bank of the River Thames is not included within the GA drawings. Please provide further information on the flood compensation scheme, including locational drawings and cross sections.
- The checklist included as Appendix D to the Drainage Strategy should be updated to respond to the comments made by the Lead Local Flood Authority (LLFA) and the District Councils' drainage teams.
- The OCC Flows and Volumes Pro-Forma document must be completed for each catchment and submitted as additional application documents.
- The application to be reviewed and revised as appropriate to address the comments made by the LLFA and the District Councils' drainage teams.
- A full Water Framework Directive Assessment is required to show considerations of all impacts of the development on water quality and provide comprehensive mitigation measures as necessary.

Heritage

- The archaeological trench evaluation report referenced in paragraph 7.76 of the Planning Statement must be submitted and the application documents should be updated to reference its conclusions. The conclusions of the report must also be incorporated into the assessment of environmental effects on un-designated archaeological remains.
- A review and clarification of the significance of the impact of the development on the scheduled monument known as Settlement Site North of Thames (HA1006345; A117) with reference to the view of Historic England that the impact would be 'moderate adverse' rather than 'slight adverse not significant'.
- South Oxfordshire District Council's (SODC) Conservation Officer and representations received on behalf of the owner-occupier of the Grade II Listed Fullamoor Farmhouse state that it was inappropriate to scope-out a full assessment of the impacts on this property. Whilst it is accepted that the greatest contribution made to the building's significance by its setting is to the south, it does not follow that its setting to the north offers no contribution at all. The asset is likely to be affected by changes to layout of the A415 and Culham Science Centre entrance, the re-purposing of the access arrangements to the property, changes in landscape planting and vegetation, and lighting. Without assessment, it is not possible to ensure that the effects are fully understood and appropriate mitigation is in place. Given the council's statutory responsibility under Section 66(1) of the Planning (Listed Buildings and Conservation Areas) Act 1990 to have special regard to the desirability of preserving the building or its setting or any features of special architectural or historic interest it possesses in considering whether to grant planning permission, further information is required to enable the LPA to understand the impacts of the development on Fullamoor Farmhouse and to ensure that any mitigation measures that may be required are secured if planning permission is granted.

Landscape & Visual Impact

- Further information is required to determine the appropriateness of some of the sensitivity levels applied to visual receptors, particularly residential properties. Clarification is also required on how the visual assessment has differentiated between motorists and cyclists/pedestrians. There is concern that the sensitivity levels applied to some receptors may have underestimated the effects and therefore the overall conclusions of the assessment.
- Further information is required to confirm the following residential receptors have been considered in the Landscape Visual Impact Assessment (LVIA), and appropriate mitigation for them has been proposed:
 - Hill Farm and Hartwright House
 - Bridge House and Bridge Farm House
 - It is not clear exactly which residential properties are included in RV 33 and RV 36 at Clifton Hampden.
- Clarification is required as to whether the mitigation included within the LVIA chapter of the ES accurately reflects the mitigation shown on the proposed landscape masterplan drawings. It is noted that some of the descriptions in the LVIA and associated photography do not reflect the mitigation proposed on the plans. Where discrepancies are identified, this should be amended in the ES and further/amended information provided to update the assessment. Please see the Landscape Advisor comments for further detail and example of potential discrepancies.
- Viewpoint 10 needs adjusting to reflect the potential views of the raised road at that location, rather than eye level views.
- Although covered in more detail in the arboricultural comments, clarification on the level of vegetation loss and retention is sought as this also has an effect on the level of landscape and visual impact. The landscape masterplan drawings show extensive areas of existing planting retained within the redline boundary. Clarification is needed on whether this is feasible and to explain what assumptions have been made.
- The landscape mitigation and enhancement proposals shown on the landscape drawings are generally lacking and need improvement. Greater levels of tree, woodland and hedgerow planting in line with landscape character guidelines throughout the scheme are required especially in locations where existing vegetation is being lost; for example more hedgerow and tree planting along new and widened sections of the road, intermittent trees and more woodland blocks for screening and integration into the landscape context, use of more species-rich grass rather than amenity grassland (using low growing variety where visibility is required) where areas are of sufficient width and size, and improving the visual amenity of noise barriers.
- Further information is also required to demonstrate how the design of the scheme including bridges, roundabout structures, acoustic barriers and retaining structures throughout the development have been informed by relevant landscape and design guidance to minimise landscape and visual effects and to ensure a successful integration into the landscape and townscape context (e.g. through their design, mass, and choice of materials). For example, can the River Thames bridge be clad in a more sympathetic render/stone work rather than pale concrete which is more visible in views? Where further measures can reduce the landscape and visual effects further, the proposal should be amended to incorporate those measures.
- Further information is also required to show the design and visual appearance of acoustic fencing, including materials to be used. Details should be provided to explain how the design of the acoustic fencing has taken into account the need to reduce as far as possible the landscape and visual impact of the development.

Arboriculture

- There are a number of discrepancies identified between existing trees and hedges shown on the scheme drawings compared with onsite features and in some case aerial photography – some of

these are identified in the comments from the Arboricultural Advisor which have been provided to you. Please ensure the submitted drawings accurately reflect the existing situation.

- There are also a number of inconsistencies between the Arboricultural Impact Assessment (AIA) and Tree Protection Plan (TPP) and other plans (such as drainage plans). These should be corrected throughout.
- Clarification is required as to whether the AIA has assessed impacts arising from works to utilities. If it has not, the AIA should be updated accordingly.
- Additionally, the TPPs state that the final extent of tree removals is to be determined. Please confirm whether the assessment is based on a worst-case scenario and, if not, provide further information to enable a reliable assessment of the impact of the development on trees to be made.
- Please respond to SODC's comments that it is contrary to policy and guidance to construct a drainage swale in the Root Protection Area (RPA) of veteran tree T424 and amend the scheme accordingly.
- A summary of total tree losses in area compared to the area identified for replacement planting is required. A suggested table format for the supply of this information is included in Table 4-1 of the Arboriculture Advisor comments. Please also measure tree and tree group loss in square metreage and hedges in linear metres. This information is to enable an overall comparison between the current tree and hedge cover without the scheme, the existing planting lost as a result of the scheme, and the replanted built scheme and therefore to inform an assessment of arboriculture impacts.
- Clarification is required over the feasibility of retaining planting identified as 'retained' and the measures that will be taken to ensure retained trees are able to survive and flourish through the construction process and once the scheme is operational. Clarification should include the assumptions that have been made around the status of these trees, ownership and control, maintenance, and construction methods.
- The AIA and LVIA should cross-reference each other to conclude whether the new planting can adequately compensate for lost planting.

Biodiversity

- Please review and revise the mitigation proposals and Landscape & Biodiversity Management Plan to show adequate compensation for the loss of riparian and in-channel semi-natural habitat and enhancements to local river habitats. Other concerns raised by the Environment Agency should also be addressed, including information to demonstrate how the ecological impacts arising from the modification of existing watercourses has been taken into account in the biodiversity assessment.
- Further information is required by way of a Habitat Regulations Assessment (HRA) screening note. The screening note should include consideration of groundwater, surface water, changes in groundwater links and pollution impacts on the European designated sites of Cothill Fen Special Area of Conservation (SAC) and Little Wittenham SAC to inform screening of likely significant effects from changes in hydrology or water quality.
- Further information is required to provide a clear comparison of habitats lost with habitats retained and/or replaced. This information is required to enable an assessment of the acceptability of the proposal in terms of its ability to compensate for and/or enhance biodiversity habitats. The information should be provided for both terrestrial and aquatic habitats.
- Further information is required with regard to the location of proposed badger fencing and the standard to which badger tunnels would be designed.

- Further information is required to explain why some waterbodies were surveyed and others were scoped out in the Aquatic Ecology Survey Report.
- Further information is required to explain the mitigation measures proposed for impacts on breeding birds, including little ringed plover, gadwall, oystercatcher, and wintering lapwing and to enable an assessment of the effectiveness of these mitigation measures (see comments from BBOWT and Biodiversity Advisor)
- Further information is required to explain how the ES has assessed the impact of the development on the Hanson Quarry Restoration Area, including Finger Lakes, and the biodiversity enhancements that would be delivered here without the proposed scheme. Further information is required to establish how the loss of these habitats would be reduced, mitigated and compensated for.
- The following matters should be clarified/corrected in the ES and its appendices and other supporting information. Please note that should the clarifications indicate that the assessment is flawed, the ES should be updated to provide an accurate assessment of the environmental effects of the development.
- The extent of peregrine territory needs to be updated on Figure 3C sheets 1 and 2 of the Breeding Birds Survey Report.
- Bird values assigned in Chapter 9 of the ES differ to those assigned in the breeding bird report which is understood to be because the scheme extent changed during the assessment process. Please amend the appendix to update the scheme extent and clarify whether this results in any material change to the assessment or findings.
- Please clarify why red kite is not mentioned in the ES despite being noted as of county importance in the wintering bird survey report.
- Please clarify how the values assigned in the bird reports have been interpreted
- Please clarify how the absence of impacts on bird species and assemblages of county importance is justified.
- In para 9.4.5 the reports stated that the assessment has been undertaken in accordance with Design Manual for Roads and Bridges (DMRB) LA 108, however, the geographical frames of reference set out in para 9.4.17 do not directly align with the guidance in LA 108. Please provide justification for the methodology used.
- Similarly, in para 9.4.1 it states that the assessment has been undertaken in accordance with DMRB LA 108. Whilst LA 108 does not set out the distances to be used for desk study searches other DMRB guidance (LA 115) does provide distances for searches of European sites, the distanced referenced in para 9.4.5 do not align with this. Please clarify the approach taken here.
- The loss of a species rich established hedgerow habitat is not considered to be 'short term'. Please update the surveys and ES accordingly.
- The limitations in the Reptile Survey Report should be amended to include reference to the impact of repeat/daily visits on levels of disturbance.
- Please provide clarification as to why ponds WB21 and WB22 were excluded from further survey work in the Great Crested Newt Report. NB. GCN are known to breed successfully in concrete lined waterbodies therefore this in itself would not be sufficient justification for the ponds being scoped out.
- Similarly, quarry excavations are also known to support GCN. Further justification is therefore needed to explain why pond WB39 was excluded from further assessment in the GCN Report.
- Clarification is required to justify the spacings between survey visits for pond cluster 3 in the GCN report. Although the 2001 GCN mitigation guidance does not specify the duration of time to be left between survey visits, good practice would be to leave at least a week between survey visits. In this instance, all four survey visits took place within a six day period.
- Clarification is required as the methodology used to establish potential otter activity in the Otter Report whether this represents a 'worst-case scenario'.
- Clarification is required on the importance valuation of Hairlike pond weed and Nitella (stonewort so.), depressed river mussel and fish in Table 9.9.

Biodiversity Net Gain Assessment

- The Biodiversity Net Gain (BNG) Assessment must be reproduced, taking into account the issues raised by the County Council's Biodiversity Advisor, the Environment Agency, and BBOWT in their responses to the planning application consultation. In particular, the BNG Assessment must ensure it satisfies the trading rules of the Biodiversity Metric 3.0. Additionally, The Biodiversity Net Gain assessment must ensure the biodiversity enhancements to be delivered by the approved Hanson restoration scheme are not double-counted but are included as part of the future baseline for the BNG assessment as well as the ES. Please also note that 'strategic significance' within the metric should be based on whether the habitats are located within a Conservation Target Area.
- Clarification is sought as to why a Modular River Physical Survey (MoRPh) survey was not undertaken on some watercourses and River Habitat Survey (RHS) data has been used instead. Further justification is needed to explain this approach as it is non-standard.
- Further clarification (including photographs where appropriate) is needed to justify why some seasonal ditches were assessed within the rivers and streams assessment and others were not.
- Metric 3.0 takes into account whether habitat creation/enhancement is created in advance or delayed from the timing of impact. Table 7 assumes the standard time to target condition is applied. Please clarify where the evidence is that compensation will be undertaken within a year of the impact the compensation is addressing.

Air Quality

- Please respond to the issues raised by Appleford Parish Council, specifically to clarify if and how the Air Quality Assessment complies with national legislation and up to date guidance from the World Health Organisation.

Noise

- The ES concludes there would be residual moderate-major increases in noise at a number of dwellings across the development site as a result of the development during its operational phase. These noise increases would be significant yet no specific mitigation appears to have been considered above and beyond low road noise surfacing. Whilst it is acknowledged that the future use of some (but not most) of these properties may change as a result of third party development, there is currently no certainty over that and therefore very little weight is attached to that possibility. Further information is therefore required in respect of the potential for reducing noise effects at these properties through mitigation above and beyond the low road noise surfacing and noise barriers proposed. Where options for mitigation have been discounted, clear justification should be provided given the significance of the adverse residual effect.
- Clarification is sought over the impact of the development, during the operational stage, on the Premier Inn Hotel at the A4130 Milton Interchange. The ES concludes there would be a significant adverse effect resulting from operational traffic however goes on to conclude that mitigation is not necessary as the noise effect would arise from third party development rather than the scheme itself. Further justification for this conclusion is required along with further information about the full range of mitigation measures that could reduce the noise effects from the development, either in isolation or in cumulation with other developments. Where options for mitigation have been discounted, clear justification should be provided given the significance of the adverse residual effect.

Agriculture & Soils

- Please clarify how the proposal has minimised as far as possible the loss of Best and Most Versatile (BMV) land through embedded mitigation and/or why alternatives that may result in a

reduction in the loss of BMV land have been discounted. Chapter 3 of the ES and the DAS set out alternatives considered, however there is very limited reference made to agricultural land quality.

- Please correct the Agricultural Land Classification colours on figure 11.2.
- Please clarify whether the effects to existing farm holdings at Zouch Farm and Fullamoor Farm are reasonably likely outcomes or a worst-case scenario with reasoned explanation.

Minerals & Waste

- It is not clear from the application documents how restoration of the Sutton Courtenay Minerals and Waste Complex would be achieved given the fact the development would prevent the approved restoration schemes at the site from being implemented in full. Please provide further information about how it is anticipated the restoration of the affected parts of the complex would be secured, and details of any agreements in place with the landowners and operators of the complex on this matter.
- It is also not clear how the existing operations at the Sutton Courtenay Minerals and Waste Complex would be affected during the construction period for the development, including during the construction of Appleford Sidings Bridge. Please provide further information on this point.
- Further information is sought regarding how the impacts of the development on the settlement of 90-acre field have been assessed and taken into account in the ES and planning application. Details should be provided to enable the LPA to establish if mitigation measures are required to address any impacts on settlement, in the event that planning permission is granted.

Recreation

- Further information to describe the status of the playing field shown on drawing GEN_PD ACM ELS DGT_ZZ_ZZ_ZZ DR LV 0006 rev P03, including its current condition and use(s) and details of when the site was most recently used as a playing field.
- Further information to enable an assessment of the application against paragraph 99 of the NPPF and Sport England's playing fields policy. This should include details of any mitigation proposed to compensate for the loss of playing field. Please note that if no mitigation is proposed, information is required to explain the reasons for this and its justification with respect to national and local planning policy.
- Please clarify whether bridleway crossing points would be Pegasus crossings, rather than Toucan crossings as currently marked on the drawings.
- Clarification is required over the proposed use of materials for multi-use routes, particularly those that are proposed for use by equestrians. The details of such materials can be secured through condition if planning permission is granted, however it is helpful at this stage to understand your intentions.
- Detailed drawings and/or inset drawings are required to illustrate those parts of the existing designated Public Rights of Way (PRoW) network that would be directly affected by the development, with details for proposed stopping up, diversions and other changes to the designated routes. The details should include but not be limited to the following affected PRoW:
 - Footpath 243/3/10 at Stert Brook
 - Bridleway 243/1/10 at Cow Lane
 - Bridleway 373/24/40 (National Cycle Network 5)
 - Bridleway 106/3/10 between Collett Roundabout and Appleford Level Crossing
 - Restricted Byway 106/4/10 to the west of Appleford Level Crossing
 - Byway Open to All Traffic (BOAT) 373/10/70 along The Portway

- Footpaths 106/8/10, 373/31/10, 373/12/40 and 373/12/50 to the north west of Appleford
 - Footpaths 171/10/10, 171/6/10, 171/3/20, 171/3/30 and 171/5/10 to the north of Clifton Hampden
- It is noted that a new bridleway link is proposed between National Cycle Network 5 and the Portway which would compensate for the loss of the existing route between Collett Roundabout and Appleford Level Crossing (Bridleway 106/3/10). However, paragraph 6.2.10 of the Transport Assessment (TA) states that the new bridleway link may be delivered by third parties. Please provide further details about the delivery of this link, the timetable for delivery, and the level of confidence that can be assumed over its delivery. Please also provide information about how bridleway provision from Collett Road northwards will be maintained if this element of the scheme is not delivered.
 - Please also review and respond to the detailed comments made by the Public Rights of Way Officer.

Utilities

- Further information to address the holding objection issued by National Grid in relation to the risks associated with the high pressure gas pipeline that would be affected by the development.

Cumulative Impacts

- Please provide clarification and justification for how sites allocated in the development plan have been considered within the ES assessment of cumulative effects and, similarly, how the future baseline for the scheme has been established. Please explain in your clarification how you consider this meets the requirements of the EIA Regulations.

Next steps

Following submission of this further information we will hold a further public consultation period as required by the above referenced Regulations.

I hope this is helpful, but please let me know if you require any clarification.

Yours sincerely

Emily Catchside

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