

Appendix 2.3

Scoping Opinion





Development Services Directorate

Development and Waste Management Unit
Staffordshire County Council
Riverway
Stafford ST16 3TJ

Enviros Consulting Limited
Telegraphic House
Waterfront Quay
Salford Quays
Manchester
M50 3XW.
FAO: Mr. M. Faulkner

Telephone: (01785) 277271
Facsimile: (01785) 211279
Email: marc.willis@staffordshire.gov.uk
Web site: www.staffordshire.gov.uk/planning

Please ask for: Marc Willis

Our Ref: SCO.12/636 W

23 January 2008 —

Dear Sirs

TOWN AND COUNTRY PLANNING (ENVIRONMENTAL IMPACT ASSESSMENT) (ENGLAND AND WALES) REGULATIONS 1999: REGULATION 10 - SCOPING OPINION

REQUEST FOR A SCOPING OPINION FOR PLANNING APPLICATION FOR AN ENERGY FROM WASTE PLANT ON LAND ADJACENT TO THE FOUR ASHES INDUSTRIAL ESTATE, SOUTH STAFFORDSHIRE

I refer to your letter dated 30 November 2007 in connection with the above proposed development and your request for a "scoping opinion" in accordance with the above regulations.

When asked, the County Council is required in accordance with Regulation 10, to give an opinion in writing about the scope and content of an Environmental Statement (ES) to accompany the submission of proposals for approval. An extension of time to respond to your request has previously been agreed until 25 January 2008 (as confirmed in your email dated 11 December 2008) and this letter constitutes our response and "scoping opinion".

BACKGROUND

Staffordshire County Council is currently in the process of consulting on a new Waste Management Strategy which is due to be finalised by early 2008. The central focus of the strategy is to increase recycling and composting rates and reduce the reliance on landfill for the disposal of residual waste. To this end the Council proposes to increase recycling and composting rates so that by 2020 around half of all municipal wastes originating within the County would be recovered and recycled and diverted away from landfill. The remaining residual wastes would then be treated at a new Energy from Waste (EfW) facility (or other alternative technology) which would treat upto 300,000 tonnes of wastes per annum. This scoping opinion has been prepared in response to the Scoping Report prepared and submitted by Enviros Consulting Ltd and which outlines the scope and contents of an EIA which is to be prepared in connection with an application for such a EfW facility.

/Contd.



INVESTOR IN PEOPLE



printed on
recycled paper

SUMMARY OF PROPOSALS

The proposed EfW plant would have a capacity to deal with a maximum of 300,000 tonnes per annum of municipal waste to be sourced from Staffordshire and other waste disposal authorities in the region. The waste would be combusted at a minimum temperature of 850°C with heat energy being exported to local industry and electricity provided to the National Grid. The footprint of the plant is expected to cover in the order of 1-2 Ha with the building expected to be approximately 45m high and the associated stack 80m high. Hours of operation would be 24hrs / 7 days a week, however, waste deliveries would take place between 07:00 to 18:00 hrs (Monday to Friday) and 07:30 to 15:00 (Saturdays), with no deliveries on Sundays or Bank Holidays. Access to the facility would be via the A5, Vicarage Rd, Station Rd and Enterprise Drive although it is stated that junction improvements would be required between the A5 and Vicarage Rd.

POLICY CONTEXT

The following development plan documents and policies therein are relevant:

- **Regional Spatial Strategy for the West Midlands** (formerly known as RPG11, published in June 2004). Particular regard should be given to policies contained within Chapter 8 'Quality of Life' including policies QE1, QE2, QE3 and QE6-QE9. Consideration should also be given to policies EN1, EN2, WD1, WD2 and WD3. Consideration should also be given to the emerging policies contained within the Phase 2 Review of the RSS. For more information refer to www.wmra.gov.uk/page.asp?id=283.
- **The Staffordshire and Stoke-on-Trent Structure Plan (1996-2011)** ('saved policies'). Regard should be given to 'saved policies' D1, D2, D5B, D7, D8, T10, T11, T18A and T18B. Consideration should also be given to policies NC1-3, NC6, NC7A-C, NC9, NC19, MW5, MW6, MW7 and MW9.
- **Staffordshire and Stoke-on-Trent Waste Local Plan (1998-2011)** ('saved policies'). Regard should be given to 'saved policies' 3, 5, 12, 14 and 16.

To view and download copies of the Structure and Waste Local Plans go to: www.staffordshire.gov.uk/planning (Click on 'Policy' and follow the links).

- **Planning for Landscape Change** (SPG to the Structure Plan). For a copy of 'Planning for Landscape Change' go to www.staffordshire.gov.uk/environment/e-land/NaturalEnvironment/Landscape/NaturalEnvironmentLandscapeCharacterTypes.htm
- **The Code of Practice for Waste Developers** (SPG to the Waste Local Plan).
- **South Staffordshire Local Plan 1996** ('saved policies'). Regard should be given to 'saved policies' GB1 (site adjacent to Green Belt), E3, E6, TR3, TR4, BE25-8, LS1, LS9, LS12, NC3, NC4, NC7. To view and download a copy of the Local Plan go to <http://www.sstaffs.gov.uk/default.aspx?page=13223>

CONSULTATIONS

The following internal and external consultees have commented as follows:

Internal consultees:

The Environment and Countryside Unit (ECU) has made a number of detailed comments which are summarised below. A copy of the ECU's full response is also enclosed for your information.

1. Landscape Impact & Landscape Character: The Scoping Report makes reference to the correct national guidelines, which, if followed should result in a proper assessment of sensitivity, magnitude and significance of landscape and visual impacts associated with these proposals. However, this section does appear to concentrate on visual impact and should make more reference to landscape impact, and its assessment. Impact on the wider environment, extending to the AONB, is raised as an issue elsewhere in the document, particularly in Table 7, where visual amenity and landscape quality are both identified as being of the highest importance. The Scoping Report is obviously a very brief description of the extent of the work envisaged and will probably require further discussions when the assessment work is being carried out, to fully address the requirements of the guidelines.

Section 2.3 - the point is made that the site is well screened due to the mixed hedges and deciduous tree belts. This will need addressing as part of visual impact, but for a building of 45m height, with 80m chimney, it is likely that this statement will need considerable qualification.

Section 3.3 - this summary description of the baseline landscape condition should make extensive reference to the regional character area, landscape character type and landscape policy zone, as described in "*Planning for Landscape Change*", (SPG to the Structure Plan Policy NC2). Further consideration should be included of a wider range of visual receptors. The EIA would be expected to refer fully, under existing character, to the Natural England Joint Character Area descriptions relevant to the area and local Landscape Character Assessment work undertaken by Staffordshire County Council and informing the landscape policy in the Structure Plan. Details of this assessment are available in the "*Planning for Landscape Change*" SPG.

For information, the proposed site is within an area in which the character conforms to the 'Settled heathlands: farmland in Cannock Chase and Cannock Wood Landscape Character Type' (LCT), and for which the landscape policy objective in the Structure Plan is 'Landscape Restoration'. Proposals for addressing mitigation should be sympathetic to existing landscape character and contribute to landscape policy.

Section 4.1 - there should be further description in Tables 3 and 4 of potential views and impact on visual amenity, with some further explanation of this term and what it relates to.

2. Biodiversity: In general the Scoping Report appears to have been taken into account previous comments on the proposals and the necessary ecological requirements incorporated. Previous discussions have indicated possible off-site mitigation for effects on breeding and/or wintering birds through a s106 agreement. Survey and assessment will therefore be required of potential sites for this compensatory measure and the potential for enhancement and management of adjacent habitats (in different ownership) should be assessed.
3. Rights of Way: There are no public rights of way on the current Definitive Map which affect this site. The County Council has not received any applications under Section 53 of the Wildlife and Countryside Act, 1981 to modify the Map. However, this does not preclude the possibility of public rights existing, albeit as yet unrecorded.
4. Historic & Cultural Environment: Modern Ordnance Survey mapping indicates that the area of the proposed Energy from Waste Plant at Enterprise Drive, Four Ashes sits within an area almost completely impacted by previous quarrying activity. Bearing in mind the previous site usage coupled with the low level of historic assets recorded on the Historic Environment Record for the surrounding area it is unlikely that archaeological remains survive across the site. It is therefore considered that no further archaeological response is required associated with the current application.

The Development Services Environmental Engineer (Noise) has no specific comments to make on the proposals as the noise section within the Scoping Report covers the main issues to be addressed by the EIA.

Transport Development Control (on behalf of the Highways Authority) has confirmed that the application would need to be supported by a Transport Assessment (TA) particularly in relation to the suitability of, Enterprise Drive, Enterprise Drive/Station Rd Junction, Vicarage Road, Vicarage Road/A5 Junction and Station Road/A449 Junction. With regard to the latter two Junctions these would require consultation with the Highways Agency. The TA would also need to include a robust Travel Plan although this would have to be sensitive to the operational nature of the site.

External Consultees:

South Staffordshire Council has no specific comments to make on the proposals as the Scoping Report covers the main issues to be addressed by the EIA.

The Environmental Health Officer (EHO) at South Staffordshire Council has made the following comments;

1. Development Description and Preferred Option: The EIA is to be based on the preferred option of the EFW plant being able to handle 300,000 tonnes per annum. To achieve this it is proposed to take waste not only from Staffordshire collection authorities, but also from other collection authorities in the region. This may not be the best environmental option and, in the circumstances, it is recommended that the EIA should include the assessment of other options for burning less waste. By including the alternative scenarios and setting out the differences in impact that these other options provide, it will better inform the assessment process.
2. Noise (including the impact from site generated traffic): As the development is to be carried out as a design and build, some detail is not currently available however, the over-riding principle of protecting occupants of residential properties from noise impacts adjacent to the site and preferred traffic routes has been discussed and established. The scoping study identifies the guidance needed for assessing the noise impact of both the construction and operation phase of the proposed development. It is however advised that further discussions take place with the EHO as the assessment work continues.
3. Soil, Air and Climate: A site investigation to establish the existence of any soil contamination is to be carried out and it is noted that it is intended to apply current industry practice to this investigation. Once the initial report is available, the EHO will then be able to review the information and make further comments. It is advised that liaison with the Environment Agency is also undertaken in respect of any groundwater concerns.

The approach to assessment of air quality and climate change impact is accepted. Some baseline data relating to dioxins and furans may already be available for comparison with the sampling proposed. Monitoring took place on behalf of Leigh (then Onyx) when it operated the clinical waste incinerator at the current Veolia site on Station Road, Four Ashes. The results of sampling were reported to the liaison meeting established at the time. For more information it is recommended that you contact the EHO to discuss on 01922 696 217.

Natural England has responded to you direct (email dated 5 December 2007). Natural England has however also responded to the County Council and comment that on the whole the submitted Scoping Report appears to adequately scope the key environmental impacts that may potentially occur and which would need to be taken into account in preparing the EIA. Natural England do however wish to emphasise the following;

- the EIA process will need to provide sufficient information to enable a Habitat Regulations assessment (aka Appropriate Assessment) of the impact of the development on the Cannock Chase Special Area of Conservation (SAC) to be undertaken, in-keeping with Circular 06/2005 Part 1. The County Council will be required, as the decision-taker, to comply with the Regulations and therefore information will need to be provided to facilitate this assessment. The SAC is vulnerable to aerial emission in particular and therefore information will need to be provided which demonstrates that this potential impact can be mitigated.
- the scope of the EIA should include impacts on county and national Biodiversity Action Plan (BAP) species and habitats in-keeping with the biodiversity duty under the Natural Environment & Rural Communities Act 2006 (NERC) and advice in Planning Policy Statement 9 (PPS9). The application should therefore seek to enhance biodiversity opportunities as well as protection.
- specifically assess the landscape impact of the development on the Cannock Chase Area of Outstanding Natural Beauty (AONB).

A copy of Natural England's response to the County Council (dated 3 January 2008) and their email to yourselves (dated 5 December 2007) are attached to this letter for your reference.

English Heritage has no specific comments to make on the proposals but states that they would expect any EIA to examine the potential effects upon all designated historic assets and their settings, together with potential impacts on non-designated features of local historic or archaeological interest and value. English Heritage strongly advises that the advice of the Local Authority's conservation section (i.e. Environment & Countryside Unit) be taken into account in preparing the EIA.

British Waterways welcome the proposal to create energy from waste and the involvement but it should be noted that British Waterways is not the drainage authority and would not allow water to run off into the navigation with out the presence of a surface water agreement. The EIA should fully consider the likely risks to groundwater, surface run-off and other contamination arising from the development. British Waterways would also welcome the use of the canal for the transport of low value waste and therefore, should the applicant wish to explore this option further, it is advised to contact Peter Moore at British Waterways, Fazeley for more information. A copy of British Waterways response and contact information is enclosed for our reference.

The Environment Agency offers the following comments on the submitted Scoping Report;

1. **Flood Risk:** a small portion of the site lies within Flood Zone 3, which is the highest flood risk zone, defined for mapping purposes by the Environment Agency. Flood Zone 3 refers to land where the indicative annual probability of flooding is 1 in 100 years or less from river sources (i.e. it has a 1% or greater chance of flooding in any given year).

It appears that the process of the 'sequential test', as set out in Planning Policy Statement 25: Development and Flood Risk (PPS25) may have been misinterpreted. PPS25 requires this test to identify sites that are at a less vulnerable risk of flooding. The Agency note that other sites have already been identified and discounted for the purpose of this development but, however, flood risk does not appear to have been taken into account. Consequently,

the Agency recommend that a separate section of the EIA be dedicated to the issue of flood risk which includes a 'sequential test' that takes into account the County Council's emerging Strategic Flood Risk Assessment (for more information on the Strategic Flood Risk Assessment visit our website at <http://www.staffordshire.gov.uk/environment/developmentcontrol/planning/policy/mineralsWasteDevelopmentFramework/StrategicFloodRiskAssessment.htm>).

In accordance with PPS25, the Sequential Test (and Exception Test if relevant) should be undertaken to demonstrate that there are no reasonably available sites in the area with a lower probability of flooding that would be appropriate to the type of development of land use proposed.

Following the application of the Sequential Test in Annex D of PPS25, if it is not possible for the development to be located in zones of lower probability of flooding, the Exception Test can be applied. The Exception Test provides a method of managing flood risk while still allowing necessary development to occur. Once the Sequential Test and Exception Test (if relevant) has been undertaken, the applicant must then undertake a Flood Risk Assessment in accordance with Annex E of PPS25 to assess the flood risk to the site.

The Flood Risk Assessment (FRA) must also address surface water drainage issues as there must be no increase in surface water run-off from the proposed development. As part of the FRA, the Agency would require the floodplain of the Saredon Brook to be accurately defined at this location. A topographical survey should be produced and the Saredon Brook should be modelled for the 1 in 100 year flood event and the 1 in 100 year plus 20% for climate change flood event.

It should be noted that without this information the Environment Agency would object to any formal planning application submitted.

2. Pollution Prevention Control Authorisation: This proposal will be of significant interest to the Environment Agency and would have to meet the relevant Pollution Prevention Control Standards as the incinerator will require a PPC Permit. The site would also fall under the Waste Incineration Directive requirements and an application for this permit would need to be made as soon as possible. It is understood that Roger Grainger (Environment Management Team Leader) has been contacted. However the Agency also strongly recommends that the applicant contacts their Industrial Process Team (Mark Lynskey) on 01543 404871.
3. Groundwater and Contaminated Land: The information submitted indicates that the EIA will consider the potential impacts on groundwater and surface water receptors during the construction, operation and decommissioning phases of the proposed development. The Agency recommend that this assessment includes consideration of the following;
 - The potential for contamination of the underlying soils and groundwater to have occurred due to the former uses of the site. Any on-site contamination may currently be impacting 'Controlled Waters' and there is potential for re-mobilisation of any contaminants during site development. This investigation should at least include a detailed desk study to determine the likelihood of contamination having occurred. An intrusive site investigation may also be appropriate to collect soil and groundwater samples for analysis and interpretation of the risks posed to 'Controlled Waters' receptors by any contamination present.

- 'Pollution prevention measures to be undertaken to ensure no contamination of 'Controlled Waters' receptors occurs during the operation of the site.
- Measures which could be undertaken to ensure no contamination of 'Controlled Waters' receptors occur during decommissioning of the site.

Finally, the Agency have no comments to make with regard to ecological issues as the Scoping Report appears to cover all the investigations required. A copy of the Environment Agency's full response is attached to this letter for your information.

The Highways Agency has confirmed that a Traffic Assessment and Traffic Impact Assessment would be required in support of the application and that any intensification of the existing access requires appropriate mitigation. The Highways Agency welcomes the proposed road widening and improvement works at the A5/Vicarage Road junction and advise that the details of the design of such works would need to be included in the application. It is understood that specific comments with regard to these details and the content of the TIA have already been provided (letter dated 14 January 2008 – a copy of which is attached for your reference). In summary, the Highways Agency state that the following issues must be considered within the application/TIA in an adequate level of detail;

- Investigation by the applicant to confirm the presence of invasive weeds in the vicinity of the proposed works area;
- Clarification of the design standard and of the junction and design speed taken into consideration with supporting traffic counts in any future submission;
- Provision of a cross section through the embankment showing the proposed slope gradient and brook level in any future submission;
- Provision of a Road Restraint Risk Assessment Process (RRRAP) assessment in any future submission;
- Provision of a full detailed sign schedule in any future submission;
- Provision of a Non-motorised Users (NMU) context report as per the requirements of HD42/05;
- Clarification that third party land has been acquired in order to establish whether the scheme is deliverable;
- Clarification of the drainage elements of the scheme to gully positions, details of revised headwall locations, headwall design standard, culvert diameter and clarification of the Staffordshire maintenance boundary in any future submission
- Clarification regarding future of headwalls and ditch.

Outstanding responses/comments

No response or comments have yet been received from the following consultees. However, any response or comments received will be forwarded on to you for your attention and should be taken into account in addition to this response.

Brewood & Coven Parish Council
Saredon Parish Council
Penkridge Parish Council
Hatherton Parish Council
Shareshill Parish Council

Forest of Mercia
South Staffordshire Water
Staffordshire Wildlife Trust
Eon

OBSERVATIONS

Staffordshire County Council welcomes this opportunity to comment on the scope of the Environmental Statement. The scoping document provides a general description of the site, describes the extent and duration of the operations and identifies the key topics and environmental issues that are to be assessed as part of the EIA. The key topics/environmental issues that have been identified and which are proposed to be assessed as part of the EIA are as follows;

1. Traffic
2. Noise
3. Population / Socio-Economics
4. Landscape
5. Water Resources
6. Land Stability & Soils
7. Ecology & Conservation
8. Air & Climate
9. Historic Environment
10. Material Assets
11. Planning Policy & Guidance

Each topic/environmental issue should include an assessment of the baseline conditions, predicted impacts, mitigation proposals (where necessary), residual impacts and conclusions. It is evident that the topics/environmental issues to be addressed as part of the EIA cover many of the issues that consultees have raised.

RECOMMENDATION

Under the powers delegated to the Corporate Director (Development Services) this letter represents Staffordshire County Council's "scoping opinion". The contents of this letter, including the comments from consultees, should be taken into account when preparing the Environmental Statement to accompany the planning application for the proposed development of an Energy from Waste Plant (EfW) on land adjacent to the Four Ashes Industrial Estate, South Staffordshire.

With regard to the Environmental Statement the topics as identified within the Scoping Report are considered to be relevant and would need to be included in the final submission. Particular topics/issues that should be included are as follows;

1. **Introduction & Project Description:** The ES should include a description of the site and its surroundings and details of the planning history of the site. The ES should also include a section which describes the various elements of the proposed development including the extent and duration of the construction works and longer-term day-to-day activities.
2. **Planning Policy & Legislative Framework:** The ES should contain a section which considers the planning policies and legislative framework against which the proposals would be considered. This section should set out to what extent the proposals accord with national, regional and local policies which are contained within statements of Government policy and the 'Development Plan' for the area. Particular regard should be given to those policies listed under the 'Policy Context' section set out earlier.

3. **Air Quality & Climate:** A key issue that will need to be considered is the potential impact that emissions from the plant may have on local air quality and on any designated sites of nature conservation importance. The ES should include an assessment of the potential impacts of the development on air quality and climate and this should cover all the topics/issues identified in Section 5.10 of the Enviro Scoping Report including details of any proposed mitigation measures.
4. **Noise & Vibration:** An assessment will need to be carried out to determine the impact of the operations on the surrounding environment. The assessment should cover all the topics/issues identified in Section 5.3 of the Enviro Scoping Report and include the predicted level of noise from the site operations and background noise monitoring at the nearest noise sensitive receptors to the site. This will need to include an assessment of the noise resulting from the operation of the EfW plant, construction plant and equipment, vehicle and traffic noise levels and set out any mitigation measures proposed.
5. **Highways & Traffic:** A Traffic Impact Assessment (TA) would be required which may be incorporated into the ES. This assessment should assess the transport effects resulting from the development and include details of proposed vehicle movements per day, hours of operation, proposed vehicle routing to and from the site and measures to prevent materials being brought onto the public highway (e.g. mud). It is noted that the Enviro Scoping Report also states that there are apparent capacity and safety issues that would require resolution via junction redesign and highway works at the junction of the A5 and Vicarage Rd, and to a lesser extent at the bridge over the Canal on Vicarage Rd to the north of the site. Details of these works would need to be included as part of the proposals and take into account the issues raised by the Highways Agency in their letter dated 14 January 2008 (attached).
6. **Ecology & Conservation:** The ES should include, a data search from the Staffordshire Ecological Record, consider the direct and indirect impacts of the development on statutory and non-statutory sites of biodiversity importance, determine the use of the site and its immediate surroundings by protected species (in particular bats, otters and great crested newts) and include details of appropriate mitigation schemes where necessary.

Natural England has stated that a Habitat Regulations¹ assessment ('appropriate assessment') would also be required to be undertaken which considers the potential impact of aerial emissions on Cannock Chase Special Area of Conservation (SAC) and possibly other internationally designated sites which lie outside of the 15 km area of search. It is strongly recommended that you contact Natural England to discuss this matter further and before any application is submitted for determination.

7. **Flood Risk, Surface & Groundwater Protection (Hydrology):** The ES will need to include a separate section dedicated to the issue of flood risk and must include a 'sequential test' as set out in PPS25 that takes into account the County Council's emerging Strategic Flood Risk Assessment. A Sequential Test (and Exception Test if relevant) should be undertaken to demonstrate that there are no reasonably available sites in the area with a lower probability of flooding that would be appropriate to the type of development of land use proposed. Once the Sequential Test and Exception Test (if relevant) have been undertaken, a Flood Risk Assessment will be required to assess the flood risk to the site.

The Flood Risk Assessment (FRA) must address surface water drainage issues as there must be no increase in surface water run-off from the proposed development. As part of the FRA, the Agency require the floodplain of the Saredon Brook to be accurately defined at this location. A topographical survey should therefore be produced and the Saredon Brook should be modelled for the 1 in 100 year flood event and the 1 in 100 year plus 20% for climate change flood event.

¹ Conservation (Natural Habitats & c) Regulations 1994

A detailed desk study is required to determine the likelihood of contamination having occurred from previous uses of the site and which may be disturbed as a result of construction activities. An intrusive site investigation may also be appropriate to collect soil and groundwater samples for analysis and interpretation of the risks posed to 'Controlled Waters' receptors by any contamination present.

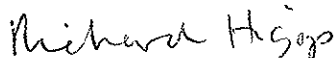
Pollution prevention measures are also required to be undertaken to ensure no contamination of 'Controlled Waters' receptors occurs during the operation of the site as well as during any decommissioning of the site.

8. **Landscape & Visual Assessment:** The ES should not only consider the site but the site surroundings as well and should describe and assess the proposals with regard to the landscape character judged against the SPG to the Structure Plan '*Planning for Landscape Change*' and Structure Plan Policies NC1 and NC2. Visual impact will need to be addressed through the application of a Zone of Visual Influence (ZVI) exercise which should show the views that would be affected by the development. Relevant up to date plans of current site conditions and impacts on the character and quality of views as well as potential mitigation for visual impacts should also be provided. For further details refer to the comments made by the ECU as set out above and enclosed in their full response.
9. **Historic Environment / Archaeology:** The ES should focus on the potential indirect impacts on the settings of nearby Scheduled Monuments, Listed Buildings, Historic Parks and Gardens and any other relevant designations. Where necessary any mitigation measures will need to be included as part of the ES. However, taking into account the previous use of the site, coupled with the low level of historic assets recorded on the Historic Environment Record for the surrounding area it is unlikely that archaeological remains survive across the site. Therefore it is considered that no further archaeological response is required associated with the current application.
10. **Soils & Land Stability:** The ES should include an assessment of the potential impacts on soils and the risks to the construction and stability of the EfW plant as a result of the sites former uses (as set out in Section 5.8 of the Enviro Scoping Report). Particular issues should include an assessment of the risks of soil contamination during the construction; operation and decommissioning of the EfW plant and include any mitigation measures that may be required in order to reduce the risk of impact.
11. **Amenity, Material Assets & Socio-Economics:** The ES should cover all the topics/issues as highlighted in Sections 5.4, 5.5 and 5.12 of the Enviro Scoping Report.

The final ES must also be summarised and accompanied by a non-technical summary.

I trust this information will be of assistance to you.

Yours faithfully,



Richard Higgs
Corporate Director (Development Services)

- Enc. Letter from British Waterways dated 15 January 2008
Letter from Natural England dated 3 January 2008
Letter from the Highways Agency dated 14 January 2008
Letter from the Environment Agency dated 16 January 2008
Memorandum from the Environment & Countryside Unit dated 21 January 2008