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**Please ask for Chris Nash**
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**Ref. No: EA/2018/0003**

30 May 2018

Dear Sir

**THE TOWN AND COUNTRY PLANNING (ENVIRONMENTAL IMPACT ASSESSMENT) REGULATIONS 2017: SCOPING REQUEST RELATING TO ERECTION OF UP TO 100,000 SQUARE METRES OF COMMERCIAL FLOOR SPACE (USE CLASSES B2 AND B8 WITH ANCILLARY B1(A) OFFICES) ON LAND AT SK2929 2245 (BURNASTON CROSS) ETWALL ROAD WILLINGTON DERBY**

I refer to the above Scoping Request received complete by this Authority on 25 April 2018.

Having regard to the advice contained within Planning Practice Guidance (PPG) and the above Regulations, the Authority has considered the Scoping Report provided and whether this provides a sufficient basis and scope for preparation of the Environmental Statement (ES), or whether further or alternative information needs to be added to satisfy the requirements of the Regulations. In considering this we have consulted a number of consultation bodies and have appended their responses to this letter.

On this basis this Authority considers that the following thematic issues should be considered within the scope of the Environmental Impact Assessment:

1. Transport
2. Heritage
3. Archaeology
4. Landscape and Visual Impact
5. Flood Risk and Drainage
6. Noise

In respect of other matters identified in your submission including those related to ecology and biodiversity; air quality and ground conditions clearly the development will have some likely effects although in the view of this Authority and based on available evidence are unlikely to give rise to significant effects. On this basis whilst appropriate consideration of these issues will be required in support of the proposed planning application it will be a matter for you to decide whether any assessment work forms part of Environmental Statement, or whether assessments are presented outside of the EIA process.

## 1. Transport

As previously stated in the Screening Matrix issued by the Authority on the 27 March 2018 there are known highways capacity issues on the Strategic Road Network locally. As a result of already committed growth and having regard to the creation of a new junction on the A50 in the vicinity Sinfin it is this Authority's view that the Environmental Statement will need to be accompanied by a Transportation Assessment in order that the potential for likely significant effects can be fully examined.

Any assessment undertaken should set out the transportation effects of the proposals and demonstrate that provision can be made for a safe and satisfactory means of access into the site. The Transportation Assessment will need to demonstrate that the access to the Service Area on the adjacent site will not be prejudiced. Additionally, given the proximity of the Strategic Road Network to the site, the Transportation Assessment will need to consider the impacts upon the A38 / A50 'Toyota Island' Grade Separated Junction.

I note that you have already been corresponding Highways England in respect of the proposed scheme and that they have made a number of general and locational comments in their response dated 18 May 2018. However, at the time of writing no formal comments on the scope and detail of any assessment has been received from Derby City Council who may hold information or guidance on the scope and methodology of any Transport Assessment to be prepared. On this basis I would suggest engagement with Derby City Council would be advisable.

## 2. Heritage

The Council considers that one of the key effects of the proposed development will be in relation to nearby heritage assets. As you will know the Inspector for the former appeal proposals on the site considered that development would have a harmful effect on the Trent and Mersey Canal and a 'significantly' harmful effect on the grade 2 listed Hall Farm. And whilst these proposals were materially different to those now proposed the Council agrees that a 'detailed heritage assessment' should be prepared to support any proposals (as you indicated in the screening request dated 7 March).

In undertaking a Heritage Assessment I would ask that regard be had to both policy in the National Planning Policy Framework and in the Council's Local Plan. In particular I would direct you to policies BNE2 (Heritage Assets) of the Local Plan Part 1 (LP1) and BNE10 (Heritage) of the Local Plan Part 2 (LP2). BNE10 explicitly requires that *"all applications should be accompanied by a heritage assessment, prepared with the appropriate expertise, to a level of detail proportionate to the asset's significance. The assessment should describe the asset's significance, identify the impact of the proposed development and provide clear justification for the works"*. It then goes on to require that developments affecting a heritage asset or its setting, including alterations and extensions to existing buildings, will be required to demonstrate how the proposal has taken account of design, form, scale, mass, siting and setting of the heritage asset, in order to ensure that the proposed design is sympathetic and minimises harm to the asset.

Should you require any further guidance from the Authority regarding your approach to undertaking a Heritage Assessment please contact the District Council's Conservation Officer Liz Knight on 01283 595983.

## 3. Archaeology

In respect of archaeology I would reiterate the comments made by the County Archaeologist. The part of the site outside of the historic gravel workings retains 'significant potential for Palaeolithic material' and this should be considered through the EIA process.

The County Council's response in respect of archaeology provides a number of comments regarding the likely approach to EIA and this should be followed in preparing any Environmental Statement.

## 4. Landscape and Visual Impact

Given the scale and nature of the development proposal any application would need to be supported by a Landscape and Visual Impact Assessment. It is acknowledged that the site is adjacent to the A50 and A38 and is not covered by local or national designations and on this basis could be scoped out of the assessment. However, based on email correspondence with FPCR to date we are aware that the LVIA proposed will be looking at viewpoints and photomontages in the vicinity of a listed building to the east of the site and the Conservation Area to the south. Given that the LVIA will directly address visual impact on heritage assets we consider appropriate to include the LVIA within the Environmental Statement.

I would ask that the comments from the County Council are fully considered in undertaking any LVIA. I would also reiterate the comments made by the County Council in respect of Lowland Derbyshire and Nottinghamshire Local Nature Partnership who have identified that Trent Valley as a 'Priority Area' for furthering environmental enhancement of the landscape. Related to this Policy INF7 (Green Infrastructure) of the LP1 *"within the Trent Valley, or other locally determined Nature Improvement Area, the District Council will support and help deliver the landscape scale change as promoted by the Lowland Derbyshire and Nottinghamshire Local Nature Partnership. Any development within the area defined by the Trent Valley Vision will be expected to contribute towards and assist in delivering the vision in accordance with the strategy. Such contributions may be in the form of appropriate design, suitable form and function, the delivery of Green Infrastructure, landscape and habitat enhancement, financial contributions or other mechanisms as appropriate, to deliver an overall benefit within the Trent Valley Vision area"*.

## 5. Flood Risk and Drainage

Based on a quick review of the Water Framework Directive Catchment Explorer available on the Environment Agency's website (see environment.data.gov.uk/catchment-planning/OperationalCatchment/3474) the site straddles the catchment of the Twyford Brook and the Eggington Brook. There are identified flood risk issues on the Sands Brook which runs through Willington to the south of the proposal site, (the Sands Brook is a tributary of the Eggington Brook) and having reviewed the Council's Strategic Flood Risk Assessment (map tile 25) the brook is likely to convey any surface water from the site to the River Trent to the south of Willington.

The Council is currently working with the Environment Agency to assess the potential for flood alleviation works on the Sands Brook within Willington and indeed has money secured from historic development in Willington to help fund any future flood works. However it is essential that any proposed development does not exacerbate flood risk downstream and where possible and appropriate contributes towards managing flood risk in the vicinity of the site and downstream. On this basis I would strongly recommend early engagement with the Environment Agency through its paid for pre-

application advice service to establish in detail the scope of flood risk assessment and associated drainage strategy for the site. The agency may also have additional environmental information such as models for the Sands Brook or records of historic flooding in the vicinity of the site which it may be able to provide in respect of any assessment work.

I would also highlight comments made by Derbyshire County Council as Lead Local Flood Authority (LLFA) that there is risk of surface water flooding on site. Any Flood Risk Assessment produced should consider flood risk from all sources and any drainage strategy should have regard to the Planning and Development Guidance Notes produced by the LLFA and available on the County Council's website. Any measures to address drainage issues on site should also conform with flood risk and drainage policies included in the LP1 (Policies SD2 and SD3).

6. **Noise**

This issue has been scoped into the assessment because it is unclear whether the proposed use could give rise to likely significant effects either during the construction or post construction phases. Consideration of this issue should be proportionate to the level of likely impact but should, in particular, focus on the potential for effects on the recently completed residential development located to the South East of the proposal site as well as a number of residential properties to the north and west of the site. This Authority considers that an appropriate noise assessment should be undertaken having regard to the operational hours of use of the site. This should seek to quantify the significance of likely effects on surrounding homes and other land uses and establish the need for appropriate mitigation measures to be included within the proposal. I note the response from the Council's Environmental Health team dated 8 May 2018 in which no comments are issued at this stage, however I would request that you contact Environmental Health again at the point that the a methodology and locations for undertaking noise assessments have been identified.

## Further considerations

It is also noted that the Environmental Statement will include a number of introductory chapters to describe the development and planning policy in the context of the site. Specifically it is indicated that the ES will include an introduction, a summary of planning policy, a description of the site, surroundings and proposed development and the consideration of alternatives. However, it is the View of this Authority that a phasing plan be included within the Environmental Statement. Clearly such a plan could be an important part of identifying the time frame over which construction phase effects will take place and in the view of this Authority this would improve the understanding of, and significance of, likely effects.

In respect of issues not screened into this assessment, as previously stated it will be a matter for you to decide whether to included proportionate consideration of these issues within the Environmental Statement. However please note the following:

### Ecology and Biodiversity

You will have already have seen the response from the Wildlife Trust regarding the assessment of biodiversity on the site. This response acknowledges that that the environmental impacts from an ecological perspective are unlikely to be significant. Notwithstanding this due to the scale of the proposal it is considered that an Ecological Impact Assessment (EcIA) will be required. This should be in accordance with the further surveys and measured outlined in section 6 of the Preliminary Ecological Appraisal and Bat Roost Assessment survey prepared by BWB Consulting issued on the 29 March. Where appropriate new survey work should have regard to previous ecological survey work undertaken in 2006 to

support a similar scheme on this site as this could provide important context and background to emerging proposals.

In addition the Wildlife Trust Response notes that: *"It is important that the final ecological assessment clearly demonstrates, through use of the Defra Biodiversity Accounting metrics, that the development will result in no net loss of biodiversity, in accordance with the objective set out in the National Planning Policy Framework (NPPF) for the environmental dimension of sustainable development"*. The Council agrees that as a minimum there should be not loss of biodiversity, however would highlight that the LP1 Policy on Biodiversity (BNE3), goes further than National Policy and states that the Local Planning Authority will *"support development which contributes to the protection, enhancement, management and restoration of biodiversity or geodiversity and delivers net gains in biodiversity wherever possible by… supporting and contributing to the targets set out in the Lowland Derbyshire and/or National Forest Biodiversity Action Plan (BAP) for priority habitats and species"*. In light of the above any EcIA will need to demonstrate how biodiversity gain will be delivered on site, although as noted in the Trusts response *"the site is largely dominated by improved grassland of low ecological value and native hedgerows it should be reasonably straightforward to achieve [gains] through the 'trading up' of habitats created as part of the landscaping and water attenuation features of the development together with compensatory native hedge planting"*.

### Socio economic

For many types of assessment such as the production of Flood Risk Assessments, Noise Assessments, Landscape and Visual Impact Assessment etc. there is widely accepted methodologies for undertaking such exercises. However, in our experience the consideration of socio economic issues can vary significantly in respect of scope and methodology. For the avoidance of doubt therefore it is the view of this Council that any socio economic assessment should consider the number of jobs likely to be created, and the location the workforce is likely to be drawn from given the low level of unemployment in the District (currently 0.8% or 535 people at April 2018). Given the low level of unemployment and the proximity of the site to the Strategic Road Network it is highly likely that significant number of workers will be drawn from neighbouring Authorities and the location that required workforce will be drawn should be considered. This could in turn inform the transport assessment to be included in the Environmental Statement. Other issue which you may wish to consider includes the creation of indirect employment as a result of proposals locally, the extent to which development could support other local businesses and the potential of development to support improved community infrastructure or transport provision locally.

### Soils and Agricultural Land Quality

You will note that the response from Natural England dated the 21st May 2018. Within the response it is suggested that soil and agricultural land quality should be considered within the Environmental Statement. For the avoidance of doubt this Authority does not consider that the proposal will have likely significant effects in respect of soil. This view is based on the following:

- More than half of the site has historically been subject to minerals workings and subsequently used for tipping. On this basis it is agricultural land quality is likely to have been affected;
- Available strategic level information in respect of agricultural land quality indicates that soil quality generally in the vicinity of the site is likely to be grade 3a or 3b.

Nonetheless I would suggest in light of the Government's policy in the framework for the protection of best and most versatile (BMV) agricultural land proportionate consideration of this issue will be required to support any planning application as you have previously indicated in the information you have submitted.

### Air Quality

There are no air quality management areas in South Derbyshire and there is no indication that air quality is an issue in the vicinity of the site. However it is likely that proportionate consideration of air quality impacts will be required to support any proposal. This should include consideration of dust and other construction related effects on surrounding homes and the service area during construction and the potential for effects on Air Quality Management Areas in Derby City due to increase traffic generation.

### Ground Conditions

Based on a review of previous land and contamination chapter and having regard to the fact that the site has remained in continuous agricultural use since the previous proposal were considered (and supported by an ES) I am satisfied the proposal will not have likely significant effects in respect of contamination. Notwithstanding this fact proportionate consideration of this issue updated as appropriate should be provided as part of any planning application.

## Next steps

A copy of this Scoping Opinion has been placed on the planning register, in accordance with the Regulations, and is available to view at the Council Offices during normal opening hours.

I trust this information is of assistance but should you require any clarification or further explanation of the issues considered within this opinion please do not hesitate to contact Chris Nash directly on (01283) 595926.

Yours faithfully,

Authorised Officer of the Council Date: 30 May 2018

*Enc. Responses from consultees*

## Nash Chris

| | |
|---|---|
| **From:** | Stephen Baker (Economy Transport and Environment) <Stephen.Baker@derbyshire.gov.uk> |
| **Sent:** | 16 May 2018 15:30 |
| **To:** | Planning |
| **Cc:** | Nash Chris |
| **Subject:** | Scoping request: Land at Burnaston Cross, South Derbyshire. Erection of up to 100,000 square metres of commercial floor space (use class B2/B8 with ancillary B1a offices) - archaeology |

Dear Chris,
Thank you for consulting on the above request for scoping comments. The applicant has submitted a list of proposed EIA chapters without any further detail in the form of a scoping report.

The proposal site of about 31ha sits in an archaeologically sensitive part of the Trent Valley, with many known archaeological sites of regional/national importance. In the Willington area there is a particularly rich resource relating to the prehistoric period.

A significant part of the site has however been impacted by previous gravel extraction – this is the area in the northern part of the site occupied by HER 27920, a record of numerous Palaeolithic implements found in gravel pits between the 1930s and 1960s. At least 20 'early Acheulean' and 6 'Middle Acheulean' hand-axes and 3 flakes are recorded – these relate to the very earliest known period of human occupation in Britain from about 500,000 years BP. The gravel terraces in this area are known to be particularly rich in Palaeolithic material – presumably reworked in later gravel material.

The part of the site outside the historic gravel workings (the southern part of the proposal site) will retain a significant potential for further Palaeolithic material, and this should be considered in the EIA process. The likely geological source and context of this material should be identified, and possible evaluation, mitigation and recording techniques developed.

This part of the site also has a potential for more conventional below-ground archaeology at the surface of the gravel terrace, relating to more recent Holocene prehistoric activity. Cropmarks of probable Neolithic/Bronze Age activity are known from an area just south of the site boundary (beyond the railway line): HER 27904 includes a possible hengiform and other ring ditches and linears. The relevant cropmark plots should be identified as part of the EIA process, to guide an understand of archaeological potential within the southern part of the proposal site.

The EIA process should therefore include a desk-based phase, pulling in the lines of inquiry outlined above as well as a more conventional archaeological desk-based assessment approach. Archaeological evaluation of the undisturbed part of the site is also advised, to comprise geophysical survey in the first instance followed by trial trenching where considered appropriate.

Regards

Steve Baker MA MCIfA | Archaeologist
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Strategic Director

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Email: planningpolicy@derbyshire.gov.uk
Telephone: (01629) 539667
Our Ref: Developer Contributions/DHP
Your Ref: EA/2018/0003
Date: 22 May 2018

Chris Nash
South Derbyshire District Council
**By email**

Dear Mr Nash,

**TOWN AND COUNTRY PLANNING (ENVIRONMENTAL IMPACT ASSESSMENT) (ENGLAND AND WALES) REGULATIONS 2017: SCOPING REQUEST RELATING TO ERECTION OF UP TO 100,000 SQUARE METRES OF COMMERCIAL FLOOR SPACE (USE CLASSES B2 AND B8 WITH ANCILLARY B1(A) OFFICES) ON LAND AT SK2929 2245 (BURNASTON CROSS) ETWALL ROAD WILLINGTON DERBY**

Thank you for your consultation dated 01 May 2018.

**Officer Comments**

The information provided below is based on the ~~application~~ consultation details as provided by the District Council.

**Landscape Comments**

This scoping request relates to the proposed development of agricultural land to the north of Willington referred to as Burnaston Cross. The proposal is for the creation of 100,000m2 of commercial floor space for B2/B8 use class with ancillary B1a offices in a mix of unit sizes ranging from around 1,500 to 27,000 square metres. The applicant assesses the site to be a Schedule 2 development as set out in the EIA Regulations having a development area in excess of 0.5ha. However, the applicant concludes that due to the site's location adjacent to the A50 and A38 and the fact it is not covered by any national or local designations, it is not considered to be environmentally sensitive and as a result does not necessitate the preparation of a full EIA.

The screening request does however outline a number of reports that would be submitted as part of the application. This includes a Landscape and Visual Impact Assessment, which I would suggest is appropriate given the open character of the landscape. With regard to the preparation of a LVIA, Derbyshire County Council has a standard response which I attach. The proposed site is located within the Trent Valley Washlands: Lowland Village Farmlands Landscape Character Type as defined in the *'Landscape Character of Derbyshire'* publication (www.derbyshire.gov.uk/landscape). This is a landscape broadly

defined in the study as "*a large scale, open, gently rolling lowland landscape associated with the lower slopes and terraces of broad flood plains. A mixed farming landscape defined by medium to large regular fields with thorn hedges, punctuated by villages*". This description reflects the visually sensitive nature of the landscape, which would need to be addressed as part of the assessment process.

I would also draw the applicant's attention to the aspirations of the Lowland Derbyshire and Nottinghamshire Local Nature Partnership (LNP) who have identified the Trent Valley as a *'Priority Area'* for furthering the environmental enhancement of the landscape. Further information about the Trent Valley Priority Area can be found on the LNP website at http://ldnlnp.org/trent-valley.Consideration of how this development might further the ambitions of the LNP might form part of the proposals.

**Transport**

The Environmental Statement will need to be accompanied by a Transportation Assessment. This should set out the transportation effects of the proposals and demonstrate that provision can be made for a safe and satisfactory means of access into the site. The Transportation Assessment will need to demonstrate that the access to the Service Area on the adjacent site will not be prejudiced. Additionally, given the proximity of the Strategic Road Network to the site, the Transportation Assessment will need to consider the impacts upon the A38 / A50 *'Toyota Island'* Grade Separated Junction. Early engagement with Highways England would therefore be advisable.

**Flood**

Surface water

The Lead Local Flood Authority (LLFA) has completed a brief, high level review of the Council's surface water model outputs for the proposed site which has been highlighted as being at risk from surface water flooding at the time of the assessment. The surface water model outputs indicate that the proposed site is likely to be subject to surface water flooding during the critical storm duration in the 1 in 100 year return period within the site boundary at the west and south east corners of the proposed site and a small section of the central west and eastern edge of the proposed. An analysis of the County Council surface water model outputs for the 1 in 1000 year critical storm duration rainfall event indicate that the site is likely to be subject to surface water flooding in a similar yet extended pattern to that of the 1 in 100 year return period event.

The LLFA expects development to include Sustainable Drainage Systems (SuDS) within the design of a drainage strategy for any proposed development, applying the SuDS management train. Developments that do not include any SuDS features are expected to provide evidence as to why these principles cannot be followed. The applicant is advised to review the Planning and Development Guidance Notes available on Derbyshire County Council's website (www.derbyshire.gov.uk/flooding/strategy) should any guidance on the drainage strategy for the proposed development be required.

The LLFA requires that site surface water drainage is designed in line with DEFRA's Non statutory technical standards for SuDS, including restricting developed discharge of surface water to greenfield runoff rates, making suitable allowances for climate change (in line with the latest guidance from the Environment Agency) and urban creep (allowance of 10%), managing surface water as close to the surface as possible and prioritising infiltration as a means of surface water disposal. There should be no increase in the current greenfield runoff rate and the LLFA requires that this should be measured in l/s/ha for all proposed development sites.

It should be confirmed prior to commencement of works which organisation will be responsible for SuDS maintenance once the development is completed. The LLFA also strongly encourages that the developer should take into account designing drainage systems for exceedance working with the natural topography of the site, utilising natural mini sub-catchments.

Historical Data

According to LLFA held datasets, there is one record of historical flooding 290 metres southeast of the proposed site boundary relating to fluvial flooding according to DCC held records in 2008.

Fluvial Data

There is an unnamed ordinary watercourse that heads north from the north east corner of the proposed site boundary. This then remains outside of the proposed site boundary as it heads west then south west then joins the Willington / Sands Brook flowing south east towards the Trent and Mersey Canal 300 metres to the south of the proposed site boundary.

The LLFA does not generally undertake or hold any data relating to modelling on specific ordinary watercourses. The applicant is advised to contact the Environment Agency who hold modelling data for Main Rivers and some ordinary watercourses.

Due to the historic mining and mineral extraction operations in Derbyshire, networks of old stone soughs (drainage channels, sometimes known as adits) may exist beneath the ground surface in parts of the County (particularly North East Derbyshire District, High Peak Borough, Derbyshire Dales District and the Peak District National Park area). The applicant is therefore advised to investigate the potential for hidden watercourses existing on the land prior to any works being undertaken.

British Geological Survey Data

It is recommended that a site specific ground investigation is undertaken for the site.

Other Relevant Information and Comments

The County Council does not hold any records for sewer flooding (DG5). The applicant is advised to contact the local water company for this information.

The County Council does not adopt any private SuDS schemes. As such, it should be confirmed prior to commencement of works which organisation will be responsible for SuDS maintenance once the development is completed.

Any works in or nearby to an ordinary watercourse require consent from the LLFA (e.g. an outfall that encroaches into the profile of the watercourse, etc.) under the Land Drainage Act (1991). Upon receipt of any application (including the legislative fee) the LLFA has an 8 week legislative period in which to make a decision and either consent or object the proposals. If the applicant wishes to make an application for any works please contact Flood.Team@derbyshire.gov.uk.

The LLFA is currently formulating Local Guidance for planning applications for major development with surface water implications. In the interim period, and as this information may be used to inform an application for major development to which the LLFA is a statutory consultee, it should be noted the minimum details required on all major planning applications (at outline) are as follows:

- Site plan and impermeable area
- Topographic survey of the site
- Appropriate evidence to support how the site will drain (photographs / maps / a confirmation letter from a water company)
- Basic calculations of the greenfield/brownfield runoff and discharge rates, in l/s/Ha, for the site
- A quick storage estimate to show the required storage volume of surface water on site and an indication of the likely location
- Calculations should include allowances for the current Environment Agency guidance for climate change and urban creep
- Basic ground investigation (desktop survey as a minimum)
- Evidence of consideration of a variety of SuDS methods

These details are required at the early planning stage to demonstrate that the proposed site is able to drain and that due consideration has been given to the space required on site for surface water storage.

Yours sincerely,

Dane Handley-Parkin
Economy, Transport and Environment

Copies:
c/o Corporate Resources

Graham Hill, Economy, Transport and Environment
Steve Buffery, Economy, Transport and Environment
Alison Richards, Economy, Transport and Environment
Gary Ellis, Economy, Transport and Environment
Tom French, Economy, Transport and Environment
Stephen Baker, Economy, Transport and Environment
Geoff Blissett, Economy, Transport and Environment
Sue Highley, Economy, Transport and Environment
Jenny Southwell, Economy, Transport and Environment
Gill Milward, Economy, Transport and Environment
Michelle Spence, Economy, Transport and Environment
Simon Tranter, Economy, Transport and Environment

Derbyshire Wildlife Trust

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Derbyshire Wildlife Trust
Derbyshire Wildlife Trust is registered in England and Wales, company number 715879 and is registered charity number 222212

Tony Sylvester
Planning Services Manager
South Derbyshire District Council
Civic Offices
Civic Way
Swadlincote
Derbyshire
DE11 0AH

**For the attention of Chris Nash,**

Your Ref: EA/2018/0003
Our ref: DWTSOU558

10th May 2018

Dear Chris,

**Town and Country Planning (Environmental Impact Assessment) (England and Wales) Regulations 2017. Scoping request relating to Erection of up to 100,000 square metres of commercial floor space (use classes B2 and B8 with ancillary B1 (A) offices) on land at Burnaston Cross, Etwall Road, Willington**

**Ref No: EA/2018/0003**

Thank you for seeking comments from The Derbyshire Wildlife Trust in relation to the above scoping request. I am responding as the Biodiversity Planning Officer responsible for work relating to the Service Level Agreement, which South Derbyshire District Council and the Trust have signed. The following comments are aimed at providing accurate and up to date information on the nature conservation issues associated with the proposed development.

In addition to visiting the area on 10th May 2018 we have considered the following submitted information in the preparation of this response:

- Screening Opinion letter compiled by Andrew Gore of Marrons Planning dated 7th March 2018
- Preliminary Ecological Appraisal and Bat Roost Assessment Survey prepared by BWB Consulting issued 29/03/18

While it is acknowledged that the proposed development is captured by the criteria and thresholds set in paragraph 10(a) of Schedule 2 of the Environmental Impact Assessment Regulations 2017, overall we do not consider that the environmental impacts from an ecological perspective are of such significance as to warrant the production of a full Environmental Statement (ES).

We do however advise that a detailed Ecological Impact Assessment (EcIA) will be required that includes the results of the recommended further surveys and measures outlined in section 6 of the Preliminary Ecological Appraisal and Bat Roost Assessment Survey prepared by BWB Consulting issued 29/03/18 and, as such, supersedes the preliminary report.

Although the Bat Roost Assessment found no evidence of roosting bats and concluded the two agricultural buildings as having negligible roost potential, the buildings do have bat access points and features with potential to be used by roosting bats and, as such, we would expect a minimum of a single dusk emergence or dawn re-entry survey to be carried out in accordance with current best practice guidance to give confidence in this negative result.

It is important that the final ecological assessment clearly demonstrates, through use of the Defra Biodiversity Accounting metrics, that the development will result in no net loss of biodiversity, in accordance with the objective set out in the National Planning Policy Framework (NPPF) for the environmental dimension of sustainable development. We would also recommend that the assessment should refer to previous ecological assessments that have been produced in relation to the previous application at the site in order to provide background, context and justification.

It is anticipated that the proposed development will require landtake of a large proportion of the semi natural habitats present on the site including grassland and native hedgerows. However, given that the site is largely dominated by improved grassland of low ecological value and native hedgerows it should be reasonably straightforward to achieve no net loss of biodiversity through the "trading up" of habitats created as part of the landscaping and water attenuation features of the development together with compensatory native hedge planting.

It is hoped that the information provided is helpful to the Council. If you require any further information or wish to discuss any of the comments made, please do not hesitate to contact me.

Yours sincerely,

Trevor Taylor
Biodiversity Planning Officer
ttaylor@derbyshirewt.co.uk

Mr Chris Nash
South Derbyshire District Council
Civic Offices
Civic Way
Swadlincote
Derbyshire
DE11 0AH

**Our ref:** LT/2018/123244/01-L01
**Your ref:** EA/2018/0003

**Date:** 09 May 2018

Dear Mr Nash

**ERECTION OF UP TO 100,000 SQUARE METRES OF COMMERCIAL FLOOR SPACE (USE CLASS B2/B8 WITH ANCILLARY B1A OFFICES)**
**TOWN AND COUNTRY PLANNING (ENVIRONMENTAL IMPACT ASSESSMENT) (ENGLAND AND WALES) REGULATIONS 2017: REQUEST FOR SCOPING OPINION**
**ON LAND AT BURNASTON CROSS, SOUTH DERBYSHIRE.**

Thank you for giving the Environment Agency the opportunity to comment on the above request for a scoping opinion and which was received on 01 May 2018.

Having reviewed both the submitted screening and scoping requests we agree with the proposed scope of the ES. This is on the understanding that the 'Proposed Planning Application Documents' as listed on page's 6 and 7 of the scoping request are submitted as part of any future planning submission.

Yours sincerely

**Mr Nick Wakefield**
**Planning Advisor**

Direct dial 02030 253354
Direct fax 0115 846 2681
Direct e-mail nick.wakefield@environment-agency.gov.uk

Environment Agency
Trentside Offices Scarrington Road, West Bridgford, Nottingham, NG2 5FA.
Customer services line: 03708 506 506
www.gov.uk/environment-agency
End

Date: 21 May 2018
Our ref: 245785
Your ref: EA/2018/0003

NATURAL ENGLAND

Customer Services
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Crewe Business Park
Electra Way
Crewe
Cheshire
CW1 6GJ

T 0300 060 3900

South Derbyshire District Council

**BY EMAIL ONLY**

Dear Chris Nash

**Environmental Impact Assessment Scoping consultation (Regulation 15 (3) (i) of the EIA Regulations 2011): EIA Scoping Erection of up to 100,000 square metres of commercial floor space (use classes B2 and B8 with ancillary b1(a) offices)**
**Location: Land at SK2929 2245 (Burnaston Cross) Etwall Road Willington Derby**

Thank you for seeking our advice on the scope of the Environmental Statement (ES) in your consultation dated 01 May 2018 which we received on 01 May 2018.

Natural England is a non-departmental public body. Our statutory purpose is to ensure that the natural environment is conserved, enhanced, and managed for the benefit of present and future generations, thereby contributing to sustainable development.

Case law[1] and guidance[2] 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. Annex A to this letter provides Natural England's advice on the scope of the Environmental Impact Assessment (EIA) for this development.

Should the proposal be amended in a way which significantly affects its impact on the natural environment then, in accordance with Section 4 of the Natural Environment and Rural Communities Act 2006, Natural England should be consulted again.

We would be happy to comment further should the need arise but if in the meantime you have any queries please do not hesitate to contact us. For any queries relating to the specific advice in this letter only please contact me on 02080 266680. For any new consultations, or to provide further information on this consultation please send your correspondences to consultations@naturalengland.org.uk.

Yours sincerely

Caolan Gaffney
Sustainable Development Adviser

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[1] Harrison, J in *R. v. Cornwall County Council ex parte Hardy* (2001)
[2] *Note on Environmental Impact Assessment Directive for Local Planning* Authorities Office of the Deputy Prime Minister (April 2004) available from http://webarchive.nationalarchives.gov.uk/+/http://www.communities.gov.uk/planningandbuilding/planning/sustainability environmental/environmentalimpactassessment/noteenvironmental/

**Annex A – Advice related to EIA Scoping Requirements**

## 1. General Principles

Schedule 4 of the Town & Country Planning (Environmental Impact Assessment) Regulations 2011, sets out the necessary information to assess impacts on the natural environment to be included in an ES, specifically:

- A description of the development – including physical characteristics and the full land use requirements of the site during construction and operational phases.
- Expected residues and emissions (water, air and soil pollution, noise, vibration, light, heat, radiation, etc.) resulting from the operation of the proposed development.
- An assessment of alternatives and clear reasoning as to why the preferred option has been chosen.
- 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 interrelationship between the above factors.
- A description of the likely significant effects of the development on the environment – this should cover direct effects but also any indirect, secondary, cumulative, short, medium and long term, permanent and temporary, positive and negative effects. Effects should relate to the existence of the development, the use of natural resources and the emissions from pollutants. This should also include a description of the forecasting methods to predict the likely effects on the environment.
- A description of the measures envisaged to prevent, reduce and where possible offset any significant adverse effects on the environment.
- A non-technical summary of the information.
- An indication of any difficulties (technical deficiencies or lack of know-how) encountered by the applicant in compiling the required information.

It will be important for any assessment to consider the potential cumulative effects of this proposal, including all supporting infrastructure, with other similar proposals and a thorough assessment of the 'in combination' effects of the proposed development with any existing developments and current applications. A full consideration of the implications of the whole scheme should be included in the ES. All supporting infrastructure should be included within the assessment.

## 2. Soil and Agricultural Land Quality

Impacts from the development should be considered in light of the Government's policy for the protection of the best and most versatile (BMV) agricultural land as set out in paragraph 112 of the NPPF. We also recommend that soils should be considered under a more general heading of sustainable use of land and the ecosystem services they provide as a natural resource in line with paragraph 109 of the NPPF.

Soil is a finite resource that fulfils many important functions and services (ecosystem services) for society, for example as a growing medium for food, timber and other crops, as a store for carbon and water, as a reservoir of biodiversity and as a buffer against pollution. It is therefore important that the soil resources are protected and used sustainably.

The applicant should consider the following issues as part of the Environmental Statement:

1. The degree to which soils are going to be disturbed/harmed as part of this development and whether 'best and most versatile' agricultural land is involved.

   This may require a detailed survey if one is not already available. For further information on the availability of existing agricultural land classification (ALC) information see www.magic.gov.uk.

Natural England Technical Information Note 049 - *Agricultural Land Classification: protecting the best and most versatile agricultural land* also contains useful background information.

2. If required, an agricultural land classification and soil survey of the land should be undertaken. This should normally be at a detailed level, eg one auger boring per hectare, (or more detailed for a small site) supported by pits dug in each main soil type to confirm the physical characteristics of the full depth of the soil resource, ie 1.2 metres.

The Environmental Statement should provide details of how any adverse impacts on soils can be minimised. Further guidance is contained in the *Defra Construction Code of Practice for the Sustainable Use of Soil on Development Sites*.

## 3. Biodiversity and Geology

### 3.1 Ecological Aspects of an Environmental Statement

Natural England advises that the potential impact of the proposal upon features of nature conservation interest and opportunities for habitat creation/enhancement should be included within this assessment in accordance with appropriate guidance on such matters. Guidelines for Ecological Impact Assessment (EcIA) have been developed by the Chartered Institute of Ecology and Environmental Management (CIEEM) and are available on their website.

EcIA is the process of identifying, quantifying and evaluating the potential impacts of defined actions on ecosystems or their components. EcIA may be carried out as part of the EIA process or to support other forms of environmental assessment or appraisal.

The National Planning Policy Framework sets out guidance in S.118 on how to take account of biodiversity interests in planning decisions and the framework that local authorities should provide to assist developers.

### 3.2 Internationally and Nationally Designated Sites

The ES should thoroughly assess the potential for the proposal to affect designated sites. European sites (e.g. designated Special Areas of Conservation and Special Protection Areas) fall within the scope of the Conservation of Habitats and Species Regulations 2017. In addition paragraph 118 of the National Planning Policy Framework requires that potential Special Protection Areas, possible Special Areas of Conservation, listed or proposed Ramsar sites, and any site identified as being necessary to compensate for adverse impacts on classified, potential or possible SPAs, SACs and Ramsar sites be treated in the same way as classified sites.

Under Regulation 63 of the Conservation of Habitats and Species Regulations 2017 an appropriate assessment needs to be undertaken in respect of any plan or project which is (a) likely to have a significant effect on a European site (either alone or in combination with other plans or projects) and (b) not directly connected with or necessary to the management of the site.

Should a Likely Significant Effect on a European/Internationally designated site be identified or be uncertain, the competent authority (in this case the Local Planning Authority) may need to prepare an Appropriate Assessment, in addition to consideration of impacts through the EIA process.

**Sites of Special Scientific Interest (SSSIs) and sites of European or international importance (Special Areas of Conservation, Special Protection Areas and Ramsar sites)**

- Further information on SSSI's and their special interest features can be found at www.magic.gov . The Environmental Statement should include a full assessment of the direct and indirect effects of the development on the features of special interest and should identify such mitigation measures as may be required in order to avoid, minimise or reduce any adverse significant effects.

- Natura 2000 network site conservation objectives are available on our internet site http://publications.naturalengland.org.uk/category/6490068894089216

**3.3 Regionally and Locally Important Sites**
The EIA will need to consider any impacts upon local wildlife and geological sites. Local Sites are identified by the local wildlife trust, geoconservation group or a local forum established for the purposes of identifying and selecting local sites. They are of county importance for wildlife or geodiversity. The Environmental Statement should therefore include an assessment of the likely impacts on the wildlife and geodiversity interests of such sites. The assessment should include proposals for mitigation of any impacts and if appropriate, compensation measures. Contact the local wildlife trust, geoconservation group or local sites body in this area for further information.

**3.4 Protected Species - Species protected by the Wildlife and Countryside Act 1981 (as amended) and by the Conservation of Habitats and Species Regulations 2017**
The ES should assess the impact of all phases of the proposal on protected species (including, for example, great crested newts, reptiles, birds, water voles, badgers and bats). Natural England does not hold comprehensive information regarding the locations of species protected by law, but advises on the procedures and legislation relevant to such species. Records of protected species should be sought from appropriate local biological record centres, nature conservation organisations, groups and individuals; and consideration should be given to the wider context of the site for example in terms of habitat linkages and protected species populations in the wider area, to assist in the impact assessment.

The conservation of species protected by law is explained in Part IV and Annex A of Government Circular 06/2005 *Biodiversity and Geological Conservation: Statutory Obligations and their Impact within the Planning System*. The area likely to be affected by the proposal should be thoroughly surveyed by competent ecologists at appropriate times of year for relevant species and the survey results, impact assessments and appropriate accompanying mitigation strategies included as part of the ES.

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 in optimal survey time periods and to current guidance by suitably qualified and where necessary, licensed, consultants. Natural England has adopted standing advice for protected species which includes links to guidance on survey and mitigation.

**3.5 Habitats and Species of Principal Importance**
The ES should thoroughly assess the impact of the proposals on habitats and/or species listed as 'Habitats and Species of Principal Importance' within the England Biodiversity List, published under the requirements of S41 of the Natural Environment and Rural Communities (NERC) Act 2006. Section 40 of the NERC Act 2006 places a general duty on all public authorities, including local planning authorities, to conserve and enhance biodiversity. Further information on this duty is available here https://www.gov.uk/guidance/biodiversity-duty-public-authority-duty-to-have-regard-to-conserving-biodiversity.

Government Circular 06/2005 states that Biodiversity Action Plan (BAP) species and habitats, 'are capable of being a material consideration…in the making of planning decisions'. Natural England therefore advises that survey, impact assessment and mitigation proposals for Habitats and Species of Principal Importance should be included in the ES. Consideration should also be given to those species and habitats included in the relevant Local BAP.

Natural England advises that a habitat survey (equivalent 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 priority species or 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.

The development should seek if possible to avoid adverse impact on sensitive areas for wildlife within the site, and if possible provide opportunities for overall wildlife gain.

The record centre for the relevant Local Authorities should be able to provide the relevant information on the location and type of priority habitat for the area under consideration.

**3.6 Contacts for Local Records**
Natural England does not hold local information on local sites, local landscape character and local or national biodiversity priority habitats and species. We recommend that you seek further information from the appropriate bodies (which may include the local records centre, the local wildlife trust, local geoconservation group or other recording society and a local landscape characterisation document).

## 4. Landscape Character

**Landscape and visual impacts**
Natural England would wish to see details of local landscape character areas mapped at a scale appropriate to the development site as well as 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 of the development, such as changes in topography. The European Landscape Convention places a duty on Local Planning Authorities to consider the impacts of landscape when exercising their functions.

The EIA should include a full assessment of the potential impacts of the development on local landscape character using landscape assessment methodologies. We encourage 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 2013. 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.

Natural England supports the publication *Guidelines for Landscape and Visual Impact Assessment*, produced by the Landscape Institute and the Institute of Environmental Assessment and Management in 2013 (3rd edition). The methodology set out is almost universally used for landscape and visual impact assessment.

In order to foster high quality development that respects, maintains, or enhances, local landscape character and distinctiveness, Natural England encourages all new development to consider the character and distinctiveness of the area, with the siting and design of the proposed development reflecting local design characteristics and, wherever possible, using local materials. The Environmental 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.

The assessment should also include the cumulative effect of the development with other relevant existing or proposed developments in the area. In this context Natural England advises that the cumulative impact assessment should include other proposals currently at Scoping stage. Due to the overlapping timescale of their progress through the planning system, cumulative impact of the proposed development with those proposals currently at Scoping stage would be likely to be a material consideration at the time of determination of the planning application.

The assessment should refer to the relevant National Character Areas which can be found on our website. Links for Landscape Character Assessment at a local level are also available on the same page.

**Heritage Landscapes**
You should consider whether there is land in the area affected by the development which qualifies for conditional exemption from capital taxes on the grounds of outstanding scenic, scientific or historic interest. An up-to-date list may be obtained at www.hmrc.gov.uk/heritage/lbsearch.htm.

**5. Access and Recreation**
Natural England encourages 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 and, where appropriate, urban fringe areas should also be explored to help promote the creation of wider green infrastructure. Relevant aspects of local authority green infrastructure strategies should be incorporated where appropriate.

**Rights of Way, Access land, Coastal access and National Trails**
The EIA should consider potential impacts on access land, public open land, rights of way and coastal access routes in the vicinity of the development. Consideration should also be given to the potential impacts on the adjacent/nearby Click here to enter text. National Trail. The National Trails website www.nationaltrail.co.uk provides information including contact details for the National Trail Officer. Appropriate mitigation measures should be incorporated for any adverse impacts. We also recommend reference to the relevant Right of Way Improvement Plans (ROWIP) to identify public rights of way within or adjacent to the proposed site that should be maintained or enhanced.

**6. Air Quality**
Air quality in the UK has improved over recent decades but air pollution remains a significant issue; for example over 97% of sensitive habitat area in England is predicted to exceed the critical loads for ecosystem protection from atmospheric nitrogen deposition (England Biodiversity Strategy, Defra 2011). A priority action in the England Biodiversity Strategy is to reduce air pollution impacts on biodiversity. The planning system plays a key role in determining the location of developments which may give rise to pollution, either directly or from traffic generation, and hence planning decisions can have a significant impact on the quality of air, water and land. The assessment should take account of the risks of air pollution and how these can be managed or reduced. Further information on air pollution impacts and the sensitivity of different habitats/designated sites can be found on the Air Pollution Information System (www.apis.ac.uk). Further information on air pollution modelling and assessment can be found on the Environment Agency website.

**7. Climate Change Adaptation**
The England Biodiversity Strategy published by Defra establishes principles for the consideration of biodiversity and the effects of climate change. The ES should reflect these principles and identify how the development's effects on the natural environment will be influenced by climate change, and how ecological networks will be maintained. The NPPF requires that the planning system should contribute to the enhancement of the natural environment 'by establishing coherent ecological networks that are more resilient to current and future pressures' (NPPF Para 109), which should be demonstrated through the ES.

**8. Cumulative and in-combination effects**
A full consideration of the implications of the whole scheme should be included in the ES. All supporting infrastructure should be included within the assessment.

The ES 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. The following types of projects should be included in such an assessment, (subject to available 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; and
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.

## Nash Chris

**From:** Hares John <John.HARES@networkrail.co.uk>
**Sent:** 02 May 2018 09:24
**To:** Nash Chris
**Subject:** RE: Consultation - EIA Screening/Scoping - App ref EA/2018/0003

Mr Nash,

Thank you for the documents enclosed with your e-mail below, and with that preceding it, which I have noted and also forwarded onto our Town Planning Section in York for their information ahead of the formal Planning Application in due course, which should be submitted by your Authority to the following generic address, please.

TownPlanningLNE@networkrail.co.uk

Regards

*John Hares*
*Level Crossing Manager*
*Network Rail LNE and East Midlands*
*2nd Floor*
*East Midlands Control Centre*
*Bateman Street*
*DERBY, DE23 8JQ*

*Tel: 01332 442482*
*Fax: 01332 442551*
*Mobile: 07919 528461*

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**From:** Nash Chris [mailto:Chris.Nash@south-derbys.gov.uk]
**Sent:** 01 May 2018 12:09
**To:** Nash Chris
**Subject:** Consultation - EIA Screening/Scoping - App ref EA/2018/0003

Please find enclosed the Scoping Request, including the previous screening request, in reference to my previous communication.

Kind regards

**Chris Nash**
Principal Area Planning Officer – Service Delivery
T: 01283 595926
www.south-derbys.gov.uk

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www.south-derbys.gov.uk

South Derbyshire District Council

Any advice is given at officer level only and does not prejudice any formal decision the Council makes in the future.

## Nash Chris

**From:** Mills John
**Sent:** 08 May 2018 15:10
**To:** Nash Chris
**Subject:** RE: Consultation - EIA Screening/Scoping - App ref EA/2018/0003

Chris,

I can confirm that I have no comments in regards to the proposals at this stage.

Kind regards,

John Mills
Senior Environmental Health Officer
Environmental Protection Team
Environmental Health Department
South Derbyshire District Council
Tel: 01283 595903
Fax: 01283 595855
www.south-derbys.gov.uk

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**From:** Nash Chris
**Sent:** 01 May 2018 12:09
**To:** Nash Chris
**Subject:** Consultation - EIA Screening/Scoping - App ref EA/2018/0003

Please find enclosed the Scoping Request, including the previous screening request, in reference to my previous communication.

Kind regards

**Chris Nash**
Principal Area Planning Officer – Service Delivery
T: 01283 595926
www.south-derbys.gov.uk

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South Derbyshire District Council

Any advice is given at officer level only and does not prejudice any formal decision the Council makes in the future.

highways england

Our ref:
Your ref: EA/2018/0003

Adrian Chadha
Highways England
The Cube
199 Wharfside Street
Birmingham
B1 1RN

Direct Line: 0300 470 8148

Chris Nash
South Derbyshire District Council
Civic Offices
Civic Way
Swadlincote
Derbyshire
DE11 0AH

18 May 2018

Dear Chris,

**A38 & A50 Land at Etwall Road, Willington, Derby (Burnaston Cross) – EIA Scoping Opinion.**

In your letter dated 1 May 2018 you have invited Highways England to provide comments on the scope of an Environmental Impact Assessment (EIA) relating to the erection of up to 100,000sqm of commercial floor space (use classes B2 and B8 with ancillary B1(a) offices) at land at Etwall Road, Willington, Derby (known as Burnaston Cross).

The proposed development site is located within the administrative boundary of South Derbyshire District Council, adjacent the A38 / A50 junction.

I have set out below both the general and specific areas of concern that would need to be considered as part of an Environmental Statement. The comments relate specifically to matters arising from Highways England responsibilities to manage and maintain the Strategic Road Network (SRN) in England.

Comments relating to the local road network should be sought from the appropriate local highway authority.

General aspects to be addressed in all cases include:

- An assessment of transport related impacts of the proposal should be carried out and reported as described in the Department for Transport *'Guidance on Transport Assessment (GTA)'* and in accordance with Circular 02/2013. It is noted that this guidance has been archived, however still provides a good practice guide in preparing a Transport Assessment (TA). In addition, the Ministry of Housing, Communities and Local Government also provide guidance on preparing Transport Assessments.
- Environmental impact arising from any disruption during construction, traffic volume, composition or routing change and transport infrastructure modification should be fully assessed and reported.



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- Adverse change to noise and air quality should be particularly considered, including in relation to compliance with the European air quality limit values and/or in local authority designated Air Quality Management Areas (AQMAs).

Location specific aspects:

- Since March 2018 Highways England has been in correspondence with BSP who are the transport consultants acting on behalf of the applicant. In this time we have agreed the trip generation, distribution and scope of assessment to be carried out to determine the traffic impacts from the proposed development. We have also provided BSP with a VISSIM model of the A38 / A50 Burnaston Interchange (Toyota Island) validated to a 2016 base year and associated Local Model Validation Report to carry out the assessment work and support the development of a TA.
- We recommend that the overall methodology of the TA is agreed in a staged approach prior to further assessment work being carried out. This approach should avoid any abortive work.

These comments are only advisory, as the responsibility for determining the final scope of the Environmental Statement would rest with the Local Planning Authority.

Highways England comments imply no pre-determined view as to the acceptability of the proposed development in traffic, environmental or highway terms. Should the applicant wish to discuss the merits of the proposal in terms of the likely impact on the SRN please contact me on 0300 470 8148 or Adrian.Chadha@highwaysengland.co.uk.

Yours sincerely,

Adrian Chadha
Midlands Operations Directorate
Adrian.Chadha@highwaysengland.co.uk



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