

**ANNEX 3
COMPLIANCE OF ENVIRONMENTAL STATEMENT WITH EIA REGULATIONS**

The left hand column only contains a summary only of the requirements of the methodology contained at Annex 1. The shaded boxes indicate sections the methodology deem to be a minimum for compliance with the Regulations, where the audit score has shown that the ES does not comply with the Regulations.

L,C,B,S Ref	ES Ref	Comments	Requirement under ES Regulations	Whether or not complies
1.1.1 The purposes and objectives of the development should be explained	1.1 and 1.5 of Part B of ES, section 4 and section 7.1 of the ES	At 4.1.14, text refers to a table of compliance against AMR targets at section 6.1.1. This is actually contained at section 7.1	Not a requirement under the Regulations.	B
1.1.2 The design and size of the development should be described. Diagrams, plans or maps will usually be necessary for this purpose	Section 2 of Part B of ES, and Section 2 of Volume 1 of Addendum. Plans and parameters plans in Part D of ES and Volume 3 of Addendum	<p>Queries raised from review of the ES now clarified in the Addendum. Information on floor areas now contained in tables relating to the detailed and outline planning applications, but the number of residential units to be provided is only confirmed in individual topic assessments.</p> <p>Plans are generally clear and easy to reference. Clarification needed on relevant revision to plan showing waste stores and location of waste store within Building C.</p> <p>Descriptions in Part B Section 2 cross referred to drawings in EIA Part D – Very Good set of drawings generally. Key or information from key missing on some (568-07-003, 568_PP_009).</p>	<p>The methodology deems this to be part of the ‘description of the development’ under the Directive.</p> <p>This would correspond to Para 1(a) of Part 1 of Schedule 4 of the Regulations.</p>	C

L,C,B,S Ref	ES Ref	Comments	Requirement under ES Regulations	Whether or not complies
		<p>Retained Tree 85 missing from proposals plans.</p> <p>Section 2.1.11 of Part B states that 3 CHP boilers + 3 gas boilers will be accommodated in the Energy Centre, but part C Volume 3 Appendix C seems less certain. Appendix C states that best practice will require individual flues for each of the three proposed CHP boilers, but there does not appear to be enough room for this (Appendix A). A planning condition requiring detailed proposals for flues to be submitted prior to commencement of construction would be appropriate.</p>		
<p>1.1.3 Indication of physical presence / appearance of the development</p>	<p>Section 2 of Part B of ES, and Section 2 of Volume 1 of Addendum. Plans and parameters plans in Part D of ES and Volume 3 of Addendum</p>	<p>Plans are generally clear and easy to reference. Plans and elevations provided for the detailed application area. Parameters plans provided for the outline application area.</p> <p>EIA Part D – Good level of information on general elevations & sections, with further information provided by detailed elevations More information provided by descriptions in Part B Section 2, with additional information in Vol 2 of the Addendum and by the photomontage views and descriptions (Section 5) in Part C Vol 3 Appendix B12 and in the Addendum to the Townscape and Visual Assessment</p>	<p>Not a requirement under the Regulations</p>	<p>B</p>

L,C,B,S Ref	ES Ref	Comments	Requirement under ES Regulations	Whether or not complies
1.1.4 Nature of production processes and rate of production.			<p>The methodology deems this to be part of the 'description of the development' under the Directive.</p> <p>This would correspond to Para 1(a) of Part 1 of Schedule 4 of the Regulations.</p>	N/A
1.1.5 Nature and quantity of raw materials needed.		<p>Not given in terms of raw materials, but this information is typically not provided for this type of development. Information deduced from description of building methods and finishes (Part B ES Section 2, Addendum Volume 1 Section 2; and notes on drawings in Part D of EIA and Addendum Vol 3) and from lorry movements during Phase 1 construction.</p> <p>Construction traffic flows for later phases are not yet assessed - Phase 1 assumed to be worst case scenario.</p>	<p>The methodology deems this to be part of 'The data necessary to identify and assess the main effects which that development is likely to have on the environment' under the Directive.</p> <p>This would correspond to paras 1 and 4, Schedule 4 of the Regulations.</p>	C
1.2.1 The land area taken up by the development should be defined and its location shown clearly on a map	Site area defined at 1.1 of ES. Planning application	<p>All shown clearly in EIA Part D Drgs and Volume 3 Addendum.</p> <p>An additional planning application was submitted at March 2011 (key to plan states</p>	The methodology deems this to be part of the 'description of the development'	B

L,C,B,S Ref	ES Ref	Comments	Requirement under ES Regulations	Whether or not complies
	boundary at 568_PP_04_000 of ES and 568_07_004 and 568_01_07_001 of Addendum	Mar 2010) for reconstruction of part of the footbridge across the railway. The Site Location plan at Volume 3 of the Addendum (drawing no 568_01_07_001) shows the additional planning application boundary.	under the Directive. This would correspond to Para 1(a) of Part 1 of Schedule 4 of the Regulations.	
1.2.2 Land uses should be described and demarcated.	Section 2 of Part B of ES, and Section 2 of Volume 1 of Addendum. Development uses by zone shown in ES Part D, dwg no 568_PP_07_010	Described in Part B section 3, Part C Appendix 12 Section 5 and illustrated in Part D Parameters Plans 568_PP_07_10 and _12 Text description contained in ES and Addendum, requiring reference to 2 no. documents.	Para 1(a) of Part 1 of Schedule 4 of the Regulations requires 'a description of the physical characteristics of the whole development and the land use requirements during the construction and operational phases'	B
1.2.3 Expected duration of construction, operational and decommissioning phases.	5.2.1 of Part B and Part C Appendix B14 for construction phase.	5.2.1 states there will be 4 construction phases. Appendix B14 refers to 3. The CCoP at Appendix F refers to 4 phases, of different duration to those identified in B14. Total construction period is not clear. Figures for site vehicle and staff vehicle movements appear to have been calculated for Phase 1 only, as a worst case scenario which includes demolition and excavation of basements. The duration of the operational and	Not a requirement of the Regulations, but information on phasing / seasonal constraints to construction would assist the assessment of construction impacts.	C

L,C,B,S Ref	ES Ref	Comments	Requirement under ES Regulations	Whether or not complies
		decommissioning phases is not stated but this would not generally be expected for this type of project.		
1.2.4 Estimate number of workers and visitors during construction and operation, access to site and means of transport.	Construction workers estimated at Appendix B14. Operational period covered by Transport Assessment (Appendix B9, Part C of Addendum)	Trip generation during Phase 1 construction based on 'previous experience' and is a 'good guide as to what will be expected.' Trip generation during operational period based on generation rates and modes of travel for similar developments (TRICS data and reference to trip generation from Tesco store in Slough in sustainable location).	The methodology deems this to be part of the information needed under the Directive to enable the assessment of the main effects the development is likely to have. This would correspond to para 4, Schedule 4 of the Regulations.	B
1.2.5 Means of transporting raw materials to site	Part C Appendix B14	Transportation of raw materials to be by road. Estimate of HGV trips included	Not a requirement under the Regulations	B
1.3.1, 1.3.2, 1.3.3 Types and quantities of wastes, proposed disposal routes	2.10 of Part B ES, and 2.10 of Addendum. Section 9.3 of Transport Assessment (Appendix B9,	Details of operational waste management at 2.10 of ES and Addendum and in more detail at section 9.3 of Transport Assessment where waste storage areas defined based on 2 days accumulation of waste. Tables 9.3 and 9.4 in transport assessment set out waste generation quantities for most	1.3.2 (ways in which it is proposed to handle / treat dispose of wastes) deemed to be a requirement of the Directive, under 'data necessary to identify and assess the main effects which that development is likely	C

L,C,B,S Ref	ES Ref	Comments	Requirement under ES Regulations	Whether or not complies
	Part C of Addendum)	<p>areas of the proposed development, but no source is given for the estimates used. No allowance has been made for waste collected from the outdoor public areas of the site or from maintenance of the landscaped areas.</p> <p><i>B10 Water and Drainage</i> methods appear logical, although calculations not clear to lay reader. Suggest condition requiring more detailed proposals to be provided in advance of construction should consent be granted.</p> <p>Possible problem in relation to storage of waste in Building C due to level of ground floor in relation to adjoining ground levels.</p> <p>B14 Construction - No allowance appears to have been made for excavations to accommodate drainage retention. This would have knock on effects for traffic generation during the construction phase Quantities of construction waste not stated explicitly but implicit in HGV movements assessed. Code of Construction Practice at Appendix F, ES Part C makes a commitment to preparation of Site Waste Management Plans for each project or phase.</p>	<p>to have on the environment'</p> <p>(Would correspond to para 1c) of Part 1 of Schedule 4 of the Regulations.)</p>	

L,C,B,S Ref	ES Ref	Comments	Requirement under ES Regulations	Whether or not complies
<p>1.4.1 Indicate environment likely to be affected with the aid of a suitable map.</p>	<p>Site context plan at ES Part D, dwg 568_07_003</p>	<p>Site context plan shows surrounding area but key to adjacent land uses omitted.</p> <p>Relevant study areas adopted for individual subject area assessment are indicated either within text or with a figure. For some topic areas, a figure would assist. In several instances reference is needed to both the ES and the Addendum with reference to impact on nearby residential properties.</p> <p>For Geotechnical & Remediation only 1 map provided – impossible to locate relative to on site features</p>	<p>1.4.1 Deemed to be a requirement of the Directive, under 'data necessary to identify and assess the main effects which that development is likely to have on the environment'.</p> <p>Would correspond to para 3 of Part 1 of Schedule 4 of the Regulations.)</p>	<p>C</p>
<p>1.4.2 Affected environment should be defined broadly enough to include potentially significant effects occurring away from the site.</p>	<p>Various</p>	<p>Following comments made on the extent of the affected environment which has been affected, reference needed to the Addendum to confirm extent of some potential impacts, including noise and visual amenity</p> <p>Photo viewpoints used in the visual amenity assessment are all very close to site. The report. – B12 Para 7.15 acknowledges that parts of at least the existing structures are visible from residential areas. An illustration of available views from the residential area of Peartree and from west of the railway would have been helpful.</p>	<p>1.4.2 deemed to be a requirement of the Directive, under 'data necessary to identify and assess the main effects which that development is likely to have on the environment'.</p> <p>Would correspond to para 3 of Part 1 of Schedule 4 of the Regulations.)</p>	<p>B</p>

L,C,B,S Ref	ES Ref	Comments	Requirement under ES Regulations	Whether or not complies
1.5.1 Important components of the affected environments should be identified and described.		With the inclusion of the Addendum, generally satisfactory. (Reference to Peartree, Blackmere Road, Broadwater Crescent, local road network etc)	Information required on 'methods and investigations undertaken for this purpose' would be required under para 4 of Part 1 of Schedule 4 of the Regulations	B
1.5.2 Existing data sources should have been searched	Section 1.5, ES Part B.	Provides a summary of the main data sources consulted. Further information set out in subject assessments, e.g. Transport Assessment in Appendix B9, Part C Addendum. In most instances the data gathered and consultation responses are summarised or reported in the text rather than the providing the original data / documents referred to, which would have been preferable.	Not a requirement under the Regulations	C
1.5.3 Local land use plans and policies should be consulted and other data collected as necessary to determine baseline conditions.	Section 3 of Part B of the ES.	In some instances this is a summary of information provided in Technical Appendices within Part C of the ES. This approach has resulted in some duplication of material between Parts B and C. In the case of microclimate (3.16) the baseline description is extended into the	1.5.3 deemed to be a requirement of the Directive, under 'data necessary to identify and assess the main effects which that development is likely to have on the	B

L,C,B,S Ref	ES Ref	Comments	Requirement under ES Regulations	Whether or not complies
		assessment of impact of the proposed development.	environment'. (Would correspond to para 3 of Part 1 of Schedule 4 of the Regulations.)	
<p>2.1.1, 2.1.2</p> <p>Description of direct, indirect, secondary, cumulative, short medium and long term effects, and permanent, temporary positive and negative effects, with regard to humans, flora and fauna, soil, water, air, climate, landscape, material assets, cultural heritage.</p>	Various	<p>Assessments of impact are generally complete for the stated topic areas and receptors.</p> <p>There is no assessment of whether the development would comply with national or local planning policy</p> <p>Geotechnical assessment completed as far as possible but subject to further /ongoing remediation and further assessment may be required after demolition.</p> <p>Some areas of uncertainty exist and have not been capable of full assessment, for example firm conclusions on the demand for school places that would be generated by the development due to falling school roles.</p> <p>Retail impact anticipated to two stores in out of centre locations, although not quantified. Unsubstantiated comment made that these should still trade at national averages.</p>	<p>2.1.1, 2.1.2 deemed to be requirements of the Directive, under 'A description of the likely significant effects, direct and indirect, on the environment of the development.'</p> <p>(Would correspond to para 4 of Part 1 of Schedule 4 of the Regulations.)</p>	B/C

L,C,B,S Ref	ES Ref	Comments	Requirement under ES Regulations	Whether or not complies
		<p>Transport – Addendum contains assessment of additional scenarios as requested, as well as cumulative impacts associated with the TW scheme and the Pall Mall development.</p> <p>Transport – section 7.6 notes possible downturn in traffic levels due to economic considerations etc but these cannot be substantiated.</p> <p>Need for mitigation measures to local transport network (roads) to be monitored / kept under review.</p> <p>Water and drainage generally satisfactory although SUDs calculations not clear to lay reader.</p> <p>Visual amenity – scope limited, and shows signs of bias.</p> <p>Microclimate – wind assessment qualitative only, sunlight assessment shows adverse impact to part of development and no effective mitigation recommended.</p> <p><u>Cumulative impacts</u> Transport assessment considers cumulative impacts considered re other committed development and other SPD development Cumulative impact of Pall Mall operational noise considered.</p>		

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		<p>In some instances the assessment of impact appears to highlight the benefits of the development, or understate the adverse impact. Some impacts are described as 'not significant' in Volume 1 of the Addendum rather than being assessed in accordance with defined significance criteria relevant to that topic.</p> <p>Part B of the ES and Volume 1 of the Addendum summarises the findings of the revised Technical Appendices. In some instances the summary is not sufficient or inaccurate and reference back to the relevant Technical Appendix is required (e.g. text at top of Page 27 of Volume 1 of the Addendum, which does not accurately reflect the text of the technical Appendix B12, part 1).</p>		
<p>2.1.3</p> <p>Impacts which might arise from non-standard operating conditions to be considered</p>		<p>Generally not relevant to the development. Provision for emergency access made from the northern site access road. Not clear what would happen if there is a problem with sewerage retention / pumping system (e.g. power cut). 2 options presented for SUDs design in case site contamination does not permit use of surface water soakaways.</p>	<p>Not a requirement under the Regulations</p>	<p>N/A</p>

L,C,B,S Ref	ES Ref	Comments	Requirement under ES Regulations	Whether or not complies
2.1.4 Impacts to be described as deviation from base line conditions		Ecology – extent of impact to protected species in the event of no mitigation not presented. Flood risk - no significance criteria defined Geotechnical - no assessment of residual impact as remediation ongoing. Transport - no significance criteria defined in technical report. Some potential townscape impacts scoped out as 'not significant', positive benefits of the scheme are emphasised.	Not a requirement under the Regulations	C
2.2.1, 2.2.2 Methods should be used which are capable of identifying all impacts	Part C of ES and Volume 2 of Addendum	Methodologies generally described in Technical appendices in ES and Addendum. The following are noted:- Ecology – species surveys included in Addendum. Flood risk - refers to PPG25 but methodology not explained. Geotechnical – reference to earlier reports which are not included in the ES required. Noise - check criteria for construction noise impact is acceptable. Socio economic – not able to confirm need for school places due to uncertainty. Transport – additional modelling presented in the addendum, cumulative scenario addressed. Conclusion subject to discussion re traffic growth and other	Not a requirement under the Regulations	B/C

L,C,B,S Ref	ES Ref	Comments	Requirement under ES Regulations	Whether or not complies
		factors. Townscape is by reference mainly to 12 no viewpoints agreed with WHBC. Views potentially experienced by residents mentioned in Addendum but assessed as 'not significant'.		
2.3.1, 2.3.2 Consultations during scoping process.	Section 1.5, Part B ES; Appendix A. Part C ES	Consultations described, not clear whether these were undertaken during scoping or subsequently. Copy correspondence would have been useful to include as an Appendix. Reference to consultation responses also contained in Scoping Opinion at Appendix A. Assessment of recreation and amenity and socio economic assessment make useful references to some consultations undertaken. Some text provided on public consultation in Part B ES	Not a requirement under the Regulations	B/C
2.3.3 Key impacts should be identified for more intense investigation		Visual amenity - key impacts to listed buildings and townscape described by reference to agreed viewpoints and photomontages. Water and Drainage study considers potential overload of fully loaded existing systems	Not a requirement under the Regulations	B

L,C,B,S Ref	ES Ref	Comments	Requirement under ES Regulations	Whether or not complies
<p>2.4.1</p> <p>Data used to estimate magnitude of main impacts should be sufficient. Gaps in data should be indicated, and means of dealing with them explained.</p>		<p>Air quality refers to existing data with bias adjustment – no site specific data provided</p> <p>Ecology – additional baseline studies on reptiles, bats and info on trees provided in the Addendum</p> <p>Geotechnical – gaps in data indicated</p> <p>Uncertainty expressed over data with regards to existing school rolls / capacity in the socio economic study.</p> <p>Transport – based on TRICS data, existing similar store, and HCC PARAMICS model.</p> <p>Visual amenity – assessment based on selected viewpoints and makes limited reference to views for residents and employees.</p>	<p>2.4.1 deemed to be a requirement of the Directive, under ‘data necessary to identify and assess the main effects which that development is likely to have on the environment’.</p> <p>(Would correspond to para 3 of Part 1 of Schedule 4 of the Regulations.)</p>	<p>B/C</p>
<p>2.4.2</p> <p>Methods used to predict impact magnitude should be described and be appropriate to the project</p>		<p>Noise – need to confirm suitability of noise criteria for construction assessment.</p> <p>Transport – impact described in terms of queuing / congestion at junctions. No significance criteria stated, or reference to guidelines</p> <p>Water and drainage –calculations are provided, but no details of methodology / significance criteria.</p> <p>Visual amenity by reference to stated guidelines and stated significance criteria</p>	<p>Not a requirement under the Regulations</p>	<p>B/C</p>

L,C,B,S Ref	ES Ref	Comments	Requirement under ES Regulations	Whether or not complies
<p>2.4.3</p> <p>Predictions of impacts should be expressed in measurable ranges.</p>		<p>Generally used where appropriate. Transport - attempt to qualify findings by reference to changes in economic situation etc. Conclusion of moderate adverse only capable of definition in terms of methodology at 1.6 of Part B of the ES, not topic specific.</p> <p>Water and drainage – calculations provided for SUDs design.</p> <p>In some instances potential impacts to existing local residents are categorised as 'not significant' rather than being expressed in terms of relevant topic assessment criteria e.g. townscape / visual impacts, and impacts to residents as summarised in Volume 1 of Addendum.</p>	<p>Not a requirement under the Regulations</p>	<p>B</p>
<p>2.5.1</p> <p>Significance to affected community and society should be described and distinguished from impact magnitude.</p>		<p>Recreation assessment appears thorough. The socio economic assessment emphasises the positive impacts of regeneration. The retail impact assessment notes potential impact to some out of town stores, but not the impact to local communities if those stores close. Visual impacts to some residents described as 'not significant', rather than assessed in accordance with stated significance criteria relevant to that study.</p> <p>Potential impacts to residents during the construction period to be mitigated by a</p>	<p>2.5.1 deemed to be requirements of the Directive, under 'A description of the likely significant effects, direct and indirect, on the environment of the development.'</p> <p>(Would correspond to para 4 of Part 1 of Schedule 4 of the Regulations - assuming the affected</p>	<p>B/C</p>

L,C,B,S Ref	ES Ref	Comments	Requirement under ES Regulations	Whether or not complies
		Code of Construction Practice – mitigation measures need to be fully defined and enforced through planning condition.	community is part of the environment)	
2.5.2 Significance of impact should be assessed taking into account national and international quality standards.		Geotechnical - national / international guidelines and standards were referred to in the Quantitative Risk Assessment contained in the originally submitted ES (Sept 2010) but this document not included in ES or Addendum. Noise generally satisfactory for operational assessment but check criteria used for construction noise.	2.5.2 deemed to be requirements of the Directive, under 'A description of the likely significant effects, direct and indirect, on the environment of the development..' (Would correspond to para 4 of Part 1 of Schedule 4 of the Regulations)	B
2.5.3 Choice of standards, assumptions and value systems used to assess significance should be justified.		See 2.5.2 for comments on geotechnical and construction noise standards / criteria. No methodology or significance criteria set out for highway / transport impacts Visual amenity – reference to Guidelines, significance criteria stated. Query assessment of views 2, 9 and 12 as major beneficial, in view 2 new building reduces visibility of listed structures, in view 9 no account seems to be taken of the trees and hedgerow which will be lost and in view 12 new building again hides much of the listed structures from view. L1 and L3 obscure	Not a requirement under the Regulations	B

L,C,B,S Ref	ES Ref	Comments	Requirement under ES Regulations	Whether or not complies
		varying amounts of the listed structures but impacts are classed as Major beneficial?		
<p>3.1.1</p> <p>Alternative sites should have been considered; main advantages and disadvantages discussed and reasons for final choice given.</p>	2.3, Part B, ES	<p>As the proposals, apart from the food store, are designed to comply with the Broadwater Road SPD, a study of alternative sites for these elements of the scheme is not considered necessary. Consideration of alternative locations for the food store is set out in the PPS 4 Retail Assessment appended to part C Appendix B8.</p>	3.1.1 is sub category added as a result of Directive 97/11/EC coming into operation in the 1999 EA Regs.	B
<p>3.1.2</p> <p>Alternative processes, designs and operating conditions should be considered.</p>	Various	<p>Alternative processes not relevant. Alternative designs considered and explained at section 2.3 of Part B of the ES. Alternative uses for the silos examined at section 2.3.6 of the Addendum.</p> <p>Some sketch plans would have assisted understanding of the design options / design development.</p> <p>Need for emergency access considered in internal road layout.</p> <p>Alternative SUDs designs considered.</p> <p>Discussion of traffic diverting away from congestion in TA – but this would be a natural effect of congestion, not planned mitigation.</p>	The methodology deems this to be part of the information needed under the Directive	B

L,C,B,S Ref	ES Ref	Comments	Requirement under ES Regulations	Whether or not complies
<p>3.1.3</p> <p>If unexpectedly severe impacts identified, alternatives should be reconsidered.</p>	<p>Various</p>	<p>No unexpectedly severe impacts are identified by the ES and Addendum. Operational traffic impacts and construction operatives' traffic impacts (at Volume 1 of the Addendum, section 5.4) are assessed as moderate adverse.</p> <p>Alternative sites for the Tesco store are discounted and not reconsidered, presumably on the basis that the store is required for viability of the scheme.</p>	<p>The methodology does not deem this to be part of the information needed under the Directive</p>	<p>B</p>
<p>3.2.1</p> <p>Mitigation of all significant adverse impacts should be considered, residual impacts should be indicated.</p>	<p>Various</p>	<p>Mitigation measures generally outlined for individual topic areas.</p> <p>Residual impact assessment provided in Part B of ES. Residual impact assessment in the Addendum contained in sections 5 and 6 of the Addendum, not summarised in section 7. However, summary of all impacts is contained at new Appendix AA4 in Volume 1.</p> <p>Residual impacts for geotechnical issues not defined as remediation ongoing, further remediation may be required.</p> <p>Socio economic – possible need for school places not defined.</p> <p>Transport- mitigation not yet fully defined as</p>	<p>3.2.1 deemed to be requirements of the Directive, under 'Where significant adverse effects are identified...a description of the measures envisaged in order to avoid, reduce or remedy those effects.'</p> <p>(Would correspond to para 5 of Part 1 of Schedule 4 of the Regulations)</p>	<p>C</p>

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		this depends on monitoring. Off site mitigation to junctions – not clear whether these can be accommodated within highway land. Also, mitigation of impacts partially dependent on amendments to design of proposed adjacent Taylor Wimpey development. This land is outside of the applicant's control and the mitigation described will require a legal agreement with the land owner. Cycle route not yet determined (5.4.2 of TA). TA recognises possible need for COPZ in Peartree to deal with additional demand for off site parking spaces.		
3.2.2 Mitigation should include modification of the project, compensation and provision of alternative facilities as well as pollution control.	Various	Generally satisfactory for individual topic areas. Need for emergency access considered in internal road layout. Alternative SUDs designs considered. Pollution control provided for by incorporation of oil / petrol interceptors.	Not a requirement under the Regulations	B
3.2.3 Should be clear to what extent mitigation methods will be effective.	Various	Effects of mitigation summarised for most chapters e.g. noise, water and drainage. Need for / effectiveness of mitigation not so clear in relation to other areas e.g. traffic impacts, education.	Not a requirement under the Regulations	C

L,C,B,S Ref	ES Ref	Comments	Requirement under ES Regulations	Whether or not complies
		Mitigation during the construction period – need to ensure mitigation is undertaken through an effective CCoP.		
3.3.1 Should be a clear record of the commitment of the developer to the mitigation measures. Details of implementation and time span of measures to be given	Various	<p>Mitigation for dealing with bats on site and translocation of reptiles confirmed.</p> <p>Mitigation measures for transport not fully defined or committed, e.g. requirement for junction improvements to be subject to further modelling, not clear how off site junction improvements will be achieved, and whether these are within the control of the applicant.</p> <p>Mitigation for potential school places required not defined / committed.</p> <p>Commitment to mitigation outlined in the Sustainability Statement and the Construction Code of Practice stated at section 2.9 of the Addendum. (Appropriate planning conditions would also ensure commitment to mitigation.)</p>	3.3.1 deemed to be requirements of the Directive, under 'Where significant adverse effects are identified...a description of the measures envisaged in order to avoid, reduce or remedy those effects.' (Would correspond to para 5 of Part 1 of Schedule 4 of the Regulations)	B/C
3.3.2 Monitoring should be proposed to check environmental impacts resulting from project, and conformity with predictions within Statement.	Various	Monitoring is proposed in relation to traffic flows on the local road networks and potential need for mitigation. Otherwise monitoring not generally required for developments of this type.	Not a requirement under the Regulations	B/C

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<p>4.1.1 Need for an introduction and the aims of the assessment.</p>	<p>Section 1 of Part B ES</p>	<p>Section 1 of Part B provides a general introduction. However, section 1.2 does not fully explain the 'S19' (Regulation 19) notice and the reasons why the original ES accompanying the planning application is now superseded in its entirety.</p> <p>A more useful explanation of the role and purpose of the Addendum is provided at 1.1 of the Addendum</p>	<p>Not a requirement under the Regulations</p>	<p>C</p>
<p>4.1.2 Information should be logically arranged in sections or chapters, with table of contents or index.</p>	<p>Various</p>	<p>The information has been presented in Volumes and Sections but the ES and Addendum are difficult to reference due to the amount of text produced. Whilst some of this has been produced in response to requests for Further Information, there is duplication in some areas. The ES might have been shorter in length if the technical assessments contained in the Appendices had instead been presented as chapters or sections of the ES in a common format using common significance criteria, rather than being presented as both an Appendix <u>and</u> in summarised form as a section of Part B.</p> <p>It is also noted that the ordering of the topics considered in Part B of the ES does not appear to follow that of the Technical Appendices in Part C, which makes cross</p>	<p>Not a requirement under the Regulations</p>	<p>D</p>

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		<p>referencing cumbersome.</p> <p>Appendix B12 Visual Amenity and Arch presents information in A4 landscape format as opposed to portrait as most of the other sections – makes reading and cross referencing awkward</p> <p>The Addendum provides a useful Contents list to show the location of information in the ES and Addendum, and areas where there have been revisions / no alterations. If this had been presented at the front of Volume 1 of the Addendum (rather than in the middle) it would have been easier to reference. Contents pages at the front of every volume would also have significantly assisted referencing material in the various volumes.</p>		
<p>4.1.3 Need for chapter summaries unless chapters are very short</p>	<p>Part B ES and Volume 1 Addendum</p>	<p>Technical reports are summarised at sections 5 and 6 of Part B of the ES, and Volume 1 of the Addendum, although the topics do not appear in the same order and in some instances wording seems to vary from the technical report. Some information is contained in the summary at Part B / Volume 1 which is not contained in the technical reports at Part C / Volume 2.</p>	<p>Not a requirement under the Regulations</p>	<p>C</p>

L,C,B,S Ref	ES Ref	Comments	Requirement under ES Regulations	Whether or not complies
4.1.4 Original sources of data should be acknowledged with full references.	Various	Variable across topic areas / technical appendices – some technical reports very thorough, others poor in this respect.	Not a requirement under the Regulations	C
4.2.1 Information should be presented to be comprehensible to the non specialist.	Various	Some text hard to understand and would benefit in places from increased use of graphics, or more clarity in text / graphics. There are numerous typographical errors and incomplete text which can confuse the reader.	Not a requirement under the Regulations	D
4.2.2 Technical terms etc should be defined.	Various	There is a list of abbreviations at Appendix B of Part B of the ES but this is not a comprehensive glossary. Some, but not all other technical terms are defined in individual technical appendices.	Not a requirement under the Regulations	C
4.2.3 Statement should be presented as an integrated whole.	Various	The number of volumes and the presentation of information in an ES and Addendum make the information difficult to reference. Need to reference between Parts B and C, Volumes 1 and 2, and additional parts which are separately bound e.g. the townscape / visual assessment.	Not a requirement under the Regulations	D

L,C,B,S Ref	ES Ref	Comments	Requirement under ES Regulations	Whether or not complies
<p>4.3.1, 4.3.2</p> <p>Prominence should be given to potentially severe adverse impacts as well as potentially favourable impacts. Statements should be unbiased.</p>	<p>Various</p>	<p>The majority of adverse residual impacts identified are described as minor in nature.</p> <p>There appears to be some potential for bias in the reporting of impacts, for example in relation to socio economic issues, retail impacts, townscape / urban design issues. There is also a potential 'downplaying' of some potential impacts where these are stated as 'not significant' rather than being assessed in accordance with significance criteria relevant to that topic area. (Visual impact and the reporting of impacts to residents in section 5 of Volume 1 of the Addendum.)</p> <p>Furthermore, the conclusions in section 7 of the Addendum do not give an overall summary of the potential impacts of the development, but instead list the additional information provided, and emphasise 'further beneficial improvements' (where in some instances the information previously provided was incomplete). The summary of the additional assessment prepared for the Addendum is provided at Appendix AA4 instead of in section 7 as it was for the ES.</p>	<p>Not a requirement under the Regulations</p>	<p>C</p>

L,C,B,S Ref	ES Ref	Comments	Requirement under ES Regulations	Whether or not complies
4.4.1 Need for a non technical summary.	Part A, ES; Volume 1, Addendum	A Non Technical Summary is provided but it does not fully define the proposed quantum of development. The figures are incomplete, do not show the site location / context and cannot be referenced to the text with respect to the locations of proposed uses, without reference to the main ES text. The assessment of impacts is given in very summary form. The Addendum NTS does not explain the findings of the further studies described in the Addendum.	4.4.1 deemed to be requirements of the Directive, under 'A summary in non-technical language of the information specified above. Would correspond to para 6 of Part 1 of Schedule 4 of the Regulations.	D
4.4.2 Required content of ES.	Various	Overall, the content of the ES together with the Addendum is generally sufficient to meet the requirements of the Directive, despite shortcomings in some topic areas and difficulties in ordering and presentation of the information. However, the Non Technical Summary needs to be re-presented in a form which encompasses the environmental information provided in the ES and the Addendum, in accordance with the requirements of Schedule 4 of the EIA Regulations.	4.4.2 deemed to be requirements of the Directive, under 'A summary in non-technical language of the information specified above. Would correspond to para 6 of Part 1 of Schedule 4 of the Regulations.	C