

Transport and Works Act Application for East West Rail – Western Section
Phase 2. Oxfordshire County Council Statutory Response

Summary

Oxfordshire County Council has concerns and comments on three main areas of the Environmental Statement, as outlined below:

Highways & Transport, including Public Rights of Way

There are a number of concerns which must be addressed prior to TWAO approval, mainly in relation to the Framework Construction Management Plan (particularly construction routes, the levels of HGVs expected in relation to the duration of the works and the proposed use of some unsuitable roads). Within the submitted documents there are also locations where the scheme will significantly impact on public rights of way and the proposed mitigation needs further consideration. Because of the extent of our concerns in this area, we have provided detailed comments in Table 1 below. **On this basis, OCC must respond with a holding objection unless these matters can be resolved prior to approval**

Ecology

The submitted documentation does not contain any references towards achieving a net gain for biodiversity that we would expect from a development of this scale, and which has been promoted by EWR since the project's inception. More detailed comments on this area are provided in Table 2 below. **On this basis, and in the context of strengthened NPPF requirements in this area, OCC objects to the scheme as we believe this is an important environmental benefit.**

Cultural Heritage and Archaeology

Detailed comments on this area are set out in Table 3 below. We have recommended that one temporary land take is removed from the scheme to protect well preserved earthworks of a medieval windmill between Launton and Bicester. We have also recommended conditions for a programme of archaeological work along the rest of the scheme.

Table 1 - Highways & Transport, including Public Rights of Way

Document Reviewed	Environmental Statement
Section Reviewed	<i>See below</i>
Comments	
<p>ES Vol 2 Ch 14 Fig 2.1</p> <p>ES Vol 3 Appendix 2.2 (Draft Framework CTMP)</p>	<p>We note that, although the route through Stratton Audley Village between the A4421 and the Launton compound is no longer proposed to be used for HGVs, it is still proposed to be used for LGVs, which includes vehicles up to 7.5 tonnes, although the draft framework CTMP says that they will be predominantly 3.5 tonne and 5 tonne pick-ups and minibuses. This traffic will create a noticeable impact for residents in the village and there does not appear to be a justification as to why this traffic cannot also use the haul route adjacent the railway between the main Bicester compound and the Launton compound. LGVs are wider than cars, and along much of this route, there is insufficient width for them to pass without overrunning verges.</p> <p>OCC request that this route is reconsidered, but if it must be used for LGVs, passing bays should be considered as necessary mitigation on the LGV route, given the expected volume of traffic and the restricted width of the road, to avoid unacceptable damage to the edge of the carriageway and verge and mud on the road.</p>
<p>ES Vol 2 Ch 14 Appendix 14.3</p>	<p>The link assessment's conclusions are based on the temporary status of the impact on each link, and state that the peak is for only one month, whereas the profiles in this appendix show that traffic volumes remain at much higher than normal for several months after the peak. OCC consider that this is misleading and greater consideration should have been given to the overall profile of the increased traffic levels over the period during which each link is affected.</p> <p>Also, the absence of local facilities in an area is given as a reason for a low impact on pedestrians. In Launton village this is not considered appropriate due to the presence of a school, pub, shop, and bus stops. It also fails to take account of the fact that people walk to visit other local residents and for recreation.</p> <p>It is further suggested that the impact on pedestrians is reduced because there would be less HGV movement in the evenings and at weekends. This discriminates against groups of pedestrians who would be using the highway during the daytime (which includes the period after the end of the school day) Monday to Friday.</p>

ES Vol 2 Ch 14, 14.1.65 onwards	The ES includes a comprehensive assessment and assessment criteria for public rights of way from 14.1.65. This is very much welcomed. However, the assessment seems to place greater weight on signing and other minor infrastructure improvements compared with the effect of lengthening walking journeys, reducing the directness of public rights of way, and reducing the accessibility of rights of way by replacing at-grade level crossings with stepped overbridges. An important possible inadequacy of the PRow assessment is its reliance on desk study only.
ES Vol 2 Ch 14 Table 14.5	The sensitivity criteria uses the presence of alternatives to determine sensitivity, type of use (leisure/utility) plus vulnerable user types. But this is based on desk study only. There is also no differentiation for equestrians which is an important omission given their sensitivities to traffic.
ES Vol 2 Ch 14 Table 14.6	Table 14.6 receptor sensitivity assessment framework uses proximity to school and urban areas. It places no value on whether a route is a promoted route or if it gives access to a place of amenity interest, i.e. its recreation value. This could mean that the assessment is perceived to be biased against the recreational nature of the PRow network.
ES Vol 2 Ch 14 Table 14.7	Magnitude of impact - this differentiates between user types but groups cyclists and equestrian users together. This could be deemed unacceptable as wheel channels make steps accessible to cyclists but not to equestrian users and there is a risk that equestrian needs are perceived as being overlooked if the grouping means that cycle mitigation is enough to seemingly reduce the impact. This is especially important when changes of less than 60%-75% are classed as negligible/low.
ES Vol 2 Ch 14, 14.4.17-21	In the description of the road network in the vicinity of the project, two A roads near Bicester are not mentioned: the A4421 and A4095, parts of which are HGV construction routes.
ES Vol 2 Ch 14, 14.5 17	This paragraph acknowledges that parking provision at most stations is close to capacity and states that ' <i>without an increase in car parking the additional passengers would need to use more sustainable modes of travel to the stations</i> '. This fails to acknowledge the risk that drivers would simply leave their cars in nearby residential streets.
ES Vol 2 Ch 14 – Table 14.9 Scheme Drawings Sheet 3	OCC is concerned at the impact of lengthy, albeit temporary closure of footpaths without provision of diversions. We had requested some form of temporary provision at the Grange Farm (Launton) crossing and are disappointed to see that nothing is proposed. We request

	<p>that the project continues to look for opportunities to keep footpaths open for as long as possible within the project. We had also requested that a footpath be created over the Grange Farm overbridge, to link into footpath 272/9 and provide a good route for pedestrians from Launton across the railway without having to cross a stepped overbridge, and are disappointed to see that this is not being proposed.</p>
<p>ES Vol 3 Appendix 14.1 – Transport Assessment. Section 13.4</p>	<p>Peak hour junction capacity assessment: using the agreed methodology, only a few junctions in Oxfordshire were required to be modelled in detail. Of those, the junction of the A4421 Buckingham Road and the A4421 Skimmingdish Lane in Bicester, and the junction of the A43 and B4100 at Baynards Green, are predicted to have significant increases in queuing, on top of the impact of HS2 construction traffic. However, no physical mitigation is proposed in the form of works to provide additional capacity at the junctions. The principle of the justification for not providing physical mitigation, in terms of the additional disruption caused by the roadworks themselves compared with what is only a temporary traffic impact, is accepted. However, the justification is based on the short duration of the peak, whereas traffic volumes remain at much higher than normal for several months after the peak. We consider that this is misleading and greater consideration should be given to the overall profile of the increased traffic levels over the period during which each junction is affected.</p>
<p>ES Vol 3 Appendix 14.1 – Transport Assessment. 14.5.2</p>	<p>This paragraph says that section 14.5 (Level Crossing Assessment) includes an assessment of the Bicester London Road Level Crossing, but in fact section 14.5 makes no mention of it, and provides no reference to Appendix 14.6, where this assessment is located.</p>
<p>ES Vol 3 Appendix 14.6</p>	<p>Bicester London Road Level Crossing assessment: We consider that the impact on queueing could be underestimated due to the use of TEMPRO rather than Bicester Transport Model factors to growth the background traffic. Bicester Transport Model growth factors are in excess of TEMPRO and are considered to more accurately reflect the growth in traffic on Bicester’s network.</p> <p>Also, the assessment focuses on the delay to northbound traffic, while the impact on southbound traffic is not discussed. In fact, the queues are showing to extend beyond Station Approach and Priory Road, but without mitigation, could extend as far at Launton Road.</p> <p>The assessment suggests that a high proportion of traffic would seek an alternative route, via the Oxford Road and A41, but these routes are heavily congested. The increase</p>

	<p>in crossing downtime will also have an impact of bus, walking and cycling journey times and, as a result, the attractiveness of these modes.</p> <p>It is further noted that the assessment assumes that mitigation will be in place in the form off additional rail signals. Without this, the situation would be much worse.</p>
ES Vol 3 Appendix 14.1 – Transport Assessment. 15.2.23	The junctions listed as experiencing congestion, appear to be incorrect. Junction 15 is not included, whereas it should be, and junction 13 is included, whereas the modelling is showing that this junction would operate within capacity.
ES Vol 3 Appendix 14.1 – Transport Assessment. 15.2.25-27	This section describes proposed mitigation for temporary junction congestion in the form of the Alliance monitoring traffic and reporting it to the public and highway authority. If necessary, temporary measures, including signage and temporary traffic signals, could be installed with the agreement of the highway authority. Further discussions are required to establish the detail of this process, to ensure that the Alliance takes a proactive role, rather than sending the highway authority reports to check and waiting for our feedback before mobilising the temporary measures
ES Vol 3 Appendix 2.2 (Draft Framework CTMP)	<p>It is suggested that detailed CTMPs will be drawn up for individual construction compounds on the basis of the Framework CTMP. The Framework CTMP is lacking in detail in several respects. There needs to be a stronger commitment to suction sweep mud from the highway if it is transferred from the site in spite of the measures installed to prevent this. There should also be an explicit commitment for vehicles to travel away from the work sites via the construction routes only. This is not an exhaustive review, and further work will be required with local highway authorities to revise the framework CTMP on which the compound CTMPs can then be based.</p> <p>The appendix says that ‘Section Traffic Management Plans’ may be drawn up. We consider that these will definitely be necessary to ensure a coordinated approach to some aspects, managed by the Alliance rather than individual contractors, for example monitoring of routes that are access routes for more than one compound, and routes that are shared construction routes with HS2.</p>
ES Vol 3 Appendix 14.1 H	Position of passing bays and widening: We are concerned that these have been based on OS only, rather than topographical data. Consideration of vertical alignment and site-specific constraints will be necessary to establish whether the passing bays have sufficient intervisibility. Some of these works will require land outside the highway boundary, and if the land is not correctly identified at this

	<p>stage, it may not be possible to acquire it later. The consequences of having inadequate passing bays would be damage to the highway and potential safety issues arising from vehicles needing to reverse or drive on the verge to avoid one another. This would also bring mud onto the highway which would present a safety risk of skidding.</p> <p>It is understood that detailed design is currently being undertaken using topographical data. This must be agreed with OCC as soon as possible.</p>
<p>Scheme drawings</p>	<p>It is noted that the wing walls of the Charbridge Lane overbridge will be built to accommodate future extension of the bridge deck to accommodate a dual carriageway.</p>
<p>Draft Order</p>	<p>We welcome Clause 17, Agreements with Street Authorities. In the same way that a Supplemental Agreement was agreed in respect of Phase1 of East West Rail, OCC would seek to enter into such an agreement to cover such items as condition surveys and repair of damage, early engagement on the design of highway works and structures, traffic monitoring, notice periods for streetworks, agreement of construction traffic management plans, maintenance periods and the adoption of bridges (this is not an exhaustive list).</p>

Table 2 - Ecology

Document Reviewed	Environmental Statement
Sections Reviewed	Volume 2i – Project-wide - Chapter 9 – Ecology Volume 2ii – Route Section Assessment, Route Section 2A – Chapter 9 – Ecology Volume 3 - Appendices
Comments	
Overview	<p><u>Species and Habitat Surveys (Further Information Request)</u></p> <p>Overall the Ecology Chapter of the Environmental Statement is currently lacking sufficient information to assess the full implications of the proposals on biodiversity. Gaps in survey data for most ecological receptors has led largely to a presumption of presence of the majority of protected species. In the absence of field survey, mitigation measures outlined within the ES have been based on this precautionary approach, which has the potential to lead to under or over-mitigation, or inappropriate mitigation provision.</p> <p>It is however understood that numerous protected species and habitat surveys have been undertaken in 2018, with several still ongoing at the time of writing. Such surveys will be required to guide a more detailed mitigation design, appropriate to the species and habitats identified. An updated assessment of residual and in-combination impacts will be required following completion of all surveys to ensure mitigation sufficiently addresses the protection and management of multiple receptors. The impacts of the scheme as a whole on populations of protected species needs to be fully taken into account.</p> <p>Discussion and comments on each species or habitat of concern are considered in turn in the sections below.</p> <p><u>Net Gain (Objection)</u></p> <p>We accept that a wide range of habitats will be created as a result of the scheme. However, overall, we remain concerned that a net gain in biodiversity will not be achieved. Under the new National Planning Policy Framework (2018), the requirement to achieve measurable net gains has been strengthened and while we appreciate that standard biodiversity metrics may not be appropriate on a major linear scheme of this nature, further detail is required to ensure this is achieved.</p>

	<p>It is acknowledged that compulsory purchase of land may not be undertaken for the purpose of biodiversity mitigation, however we are concerned that there is the potential for the progressive watering down of mitigation measures and the commitment to achieving measurable biodiversity net gain.</p> <p>While further detailed species and habitat surveys will guide mitigation in each ECS, assurances must be provided that the overall availability of mitigation sites will not be reduced. At present, insufficient clarity and assurances over how this will be achieved in practice are provided. A long-term commitment to management of the ECS network is required to improve connectivity between the wider ecological network and to include species monitoring and habitat management, beyond those required in accordance with European Protected Species Mitigation licences.</p>
<p>Watercourses and Standing Water</p>	<p>It is acknowledged in section 2.3.1 of Appendix 9.2 that collection of background desk study data on watercourse and standing waterbodies rarely aligns with ground-based assessments. Therefore, the need to undertake field surveys is important in order to understand the quality of the waterbody, however insufficient survey coverage has to date been provided within the ES.</p> <p>Further information on aquatic habitats is therefore required, including provision of PSYM surveys, the methodology for which has been discussed, but not carried out. It is understood that aquatic habitat surveys are being carried out in 2018, therefore the results of these are required. Until these assessments are undertaken it cannot be stated with any certainty that these riparian habitats and the species located within them are of limited sensitivity.</p> <p>It is encouraging that several ponds have already been created prior to May 2018, however further detailed understanding of translocation of species which may not naturally colonise in the new waterbodies is required. Further evaluation needs to be guided by updated field survey.</p>
<p>White-clawed Crayfish</p>	<p>To date, no details of specific surveys for WCC within any aquatic features screened in for further assessment have been provided within the ES, therefore overall the assessment at present is insufficient.</p> <p>It is acknowledged that surveys of watercourses found to offer potential to support the species will be undertaken in 2018.</p>

	<p>While overall it is accepted that the likely impact on WCC is low, details of further surveys are required in order to ensure appropriate mitigation is provided. Safeguards presented, in the event that WCC are found during construction following a nil result from field survey, are considered appropriate however methods will need to be updated in the event that surveys confirm presence in any watercourse.</p>
Otter	<p>To date, insufficient survey information has been presented in respect of otter, with only 10% coverage of watercourses and standing water screened in for further assessment being subject to further survey. A presumption of presence has been made however in the absence of field survey limited understanding can be developed of otter use throughout the whole scheme.</p> <p>Mitigation measures outlined, including mammal ledges, are welcome and will provide opportunities for a number of other mammal species, however further refinement may be required following surveys in 2018.</p>
Water Vole	<p>As detailed above in respect of Otter, insufficient surveys have been undertaken in respect of water vole, with only low coverage to date of watercourses and standing water screened in for further assessment.</p> <p>While it is acknowledged that the risk of the scheme to water vole is relatively low, detailed mitigation measures will need to be refined following the results of 2018 field surveys.</p>
Badger	<p>Coverage of the railway corridor is largely acceptable, however further survey of the wider area is lacking within the ES. Overall a high level of activity is recorded and further detailed assessment is required based on 2018 surveys.</p> <p>A full assessment of the current impacts on badger is required, however it is acknowledged that badger surveys soon become out of date. Given the high level of activity present, assurances are required that the level of mitigation required, including sites for new setts and suitable, well-connected foraging habitat, can be achieved either within the scheme boundary or permitted off-site.</p> <p>Details of clan territories will be required to establish boundaries of badger groups, with consideration provided within the mitigation strategy for the species across the whole scheme.</p>
Bats	<p>The scheme is considered likely to significantly directly and</p>

	<p>indirectly impact upon bats during construction and operational phases. However, a concerning lack of survey detail presented within the ES means that a thorough assessment of these impacts cannot yet be made. A presumption of presence cannot be considered a substitute for field assessment given the potential harm and disturbance caused to individual bats, roosts and foraging / commuting habitat.</p> <p>No activity or crossing point surveys have been presented within the ES. Static surveys have been carried out, however these surveys are considered too old for the purpose of making this assessment, having been undertaken in 2015. Insufficient roost assessments have been provided to date.</p> <p>It is understood that a range of surveys have and will continue to be undertaken in 2018, including radio tracking, crossing point surveys, roost assessments and aerial surveys. The results of these surveys will need to be presented, along with a detailed evaluation of impacts, particularly where species such as Barbastelle and Bechstein's have been found.</p> <p>An up to date and detailed assessment of impacts during construction and operational phases is required, along with a robust assessment of residual and in-combination impacts on bat species. The advance planting of hedgerows to maintain commuting lines is a positive step in addressing habitat loss.</p>
Hazel Dormouse	<p>No survey data have been provided with the ES, therefore an assessment of likely impacts on the species cannot be made based on desk study data alone. Habitat loss and fragmentation has the potential to negatively impact upon the species, with a long-term loss of suitable habitat.</p> <p>While it is acknowledged that the risk of the scheme to dormouse is relatively low, detailed mitigation measures will need to be refined following the results of 2018 field surveys.</p>

<p>Great Crested Newt</p>	<p>Limited data have been presented within the ES in respect of GCN, due to access and seasonal restrictions. Overall an assumption of presence has been made within all waterbodies that have not be subject to detailed assessment, however information presented to date is inadequate.</p> <p>It is understood that presence/likely absence surveys have been undertaken in 2018. The results of these surveys will need to be presented, providing an assessment of population level impacts and landscape scale mitigation measures across the whole scheme.</p> <p>Compensation measures have been presented within the ES which are based on a worst-case scenario, with assumed presence in every suitable waterbody that cannot be accessed. It is accepted that the likely ratio of habitat loss to creation in respect of GCN will change in light of updated field surveys, however assurances must be provided that compensation sites will not be lost, rather specific habitat creation changed for best use. Overall a net gain must be demonstrated.</p>
<p>Reptiles</p>	<p>Although survey coverage is adequate, the presence/likely absence surveys were undertaken in 2015 and are now considered out of date. A thorough field assessment of adder has not yet been presented.</p> <p>It is understood that presence/likely absence surveys have been undertaken in 2018, including adder surveys. The results of these surveys will need to be presented, providing an assessment of population level and residual impacts. An assessment of in-combination effects with other species is required, especially where translocation of reptile species is to be undertaken.</p>
<p>Breeding and Wintering Birds</p>	<p>An inadequate assessment of likely impacts on breeding and wintering birds has been presented within the ES. An evaluation of likely impacts cannot be made on available desk study data and reasonable likelihood of species presence. Given the known presence of county and nationally rare species such as Turtle Dove within the scheme area, further detailed assessment is required.</p> <p>It is understood that breeding and wintering bird surveys have been undertaken in 2018. The results of these surveys will need to be presented, providing an assessment of population level impacts in the short and long term.</p>

Barn Owl	<p>Survey coverage for this species is low across screened-in sites within the ES. The impact assessment provided to date for Barn Owl is based on limited data and the scheme has the potential to reduce the short and longer-term breeding success of the species in the area, with collision events for adult and juvenile birds.</p> <p>It is understood that Barn Owl surveys have been undertaken in 2018. The results of these surveys will need to be presented, providing an assessment of impacts in the short and longer term.</p> <p>It is acknowledged that mitigation for Barn Owl on schemes of this nature are complicated and a balance must be sought between overall habitat creation and risks to individual Barn Owl. The exact locations of boxes are not expected at this stage, rather an overview of mitigation and residual impacts. Consultation with the Bucks Owl and Raptor Group is encouraging.</p>
Invertebrates	<p>An incomplete assessment in respect of terrestrial and aquatic invertebrates has been presented within the ES.</p> <p>It is understood that invertebrate surveys have been undertaken in 2018, including detailed mapping of Glow Worm. The results of these surveys will need to be presented, providing an assessment of impacts in the short and longer term.</p> <p>The results of these surveys shall guide the detailed design of new habitat provision, including foodplants of known benefit to identified invertebrate groups.</p>
LWS/BNS	<p>Detailed assessment of Local Wildlife Sites and Biological Notification Sites has not been sufficiently provided within the ES.</p> <p>It is understood that further assessment of these have been undertaken in 2018, including detailed botanical assessments and protected species surveys. The results of these surveys will need to be presented, providing an assessment of impacts in the short and longer term. Measures to safeguard the long term functionality of the sites will need to be refined in light of these assessments.</p>

Table 3 – Cultural Heritage & Archaeology

Document Reviewed	Environmental Statement
Section Reviewed	<i>See below</i>
<p>Comments</p> <p>The archaeological background for the scheme has been set out in a desk based archaeological assessment submitted as annex 7.1. The assessment highlights that the area of the proposed scheme has the potential to contain archaeological sites and features from a range of periods. In addition, a series of route section archaeological assessments have been produced (Volume 2ii).</p> <p>The desk based assessment however omits any examination of the aerial photographic collection held by Historic England and states that it consulted online aerial photographs only. The desk based assessment also does not include any assessment of the Lidar data held by the Environmental Agency.</p> <p>As a result of these omissions the assessment has failed to take into account the potential of these resources to identify previously unrecorded archaeological deposits and earthworks along the line of the route. The consultation of both these sources is essential if the DBA is to present an accurate assessment of the archaeological potential.</p> <p>There are a number of discrepancies in the assessment of the archaeological potential between the project wide desk based assessment and the route specific assessment 2A. In particular the desk based assessment underplays the potential for Mesolithic and Neolithic sites to be present along the route. The desk based assessment also incorrectly indicates that any in situ Mesolithic occupation evidence would be of medium significance. Occupation deposits from this period are extremely rare and would certainly be considered as being of high significance.</p> <p>We highlighted this following a consultation on the draft stage of the assessment and the route section archaeological assessment 2A has addressed these issues. The desk based assessment however has not been revised to correct these errors. Consequently, the archaeological potential assessment in 6.2.3 fails to both identify the potential for archaeological deposits of those periods being encountered and for the assessment of their significance. The potential impact of his scheme has therefore not been appropriately considered within the assessment.</p> <p>The Route 2A route section assessment highlights that a windmill mound or tump (MOX 5020) will be impacted by the use of the site as a temporary worksite and access for construction area (7.6.6). There are however no detailed plans submitted to show what this impact will consist of. Although the construction works will only involve temporary land take the impact on this feature will be permanent.</p> <p>The windmill mound (MOX 5020) is referred to as a possible windmill mound and is assessed as having a low heritage value. This is incorrect and misleading. The feature can be clearly identified on Lidar images from the Environment Agency and on aerial photographs held by Historic England. The mound survives as a well-preserved earthwork although the north-eastern edge has been disturbed by the development of</p>	

the ring road. A second windmill is visible on the Lidar. These sources were not consulted by the desk based assessment and therefore the well-preserved nature of the earthworks was not considered when the assessment concluded that it was of low heritage value. These remains are currently undated but documentary evidence does suggest that they may be medieval in date. Historical evidence records that Launton had a demesne windmill in 1279AD but the site was farmed after 1292AD. If these remains do relate to this windmill then it would be a particularly early example for the area and of considerable local importance.

We would recommend that the area of the earthworks related to these two windmill mounds be removed from the temporary land take in order to preserve the earthworks in situ. The area of the earthworks should then be fenced off to prevent accidental disturbance of the earthworks during construction. A staged programme of evaluation and mitigation will be required for the remainder of the scheme where ground disturbance is proposed.

We would, therefore, recommend that, should planning permission be granted, the applicant should be responsible for ensuring the implementation of a staged programme of archaeological investigation to be maintained during the period of construction. This can be ensured through the attachment of a suitable negative condition along the lines of:

- 1 No development shall take place until fencing has been erected around the area of earthworks related to the windmill mound at Launton (MOX 5020) to protect the earthworks and no operations shall take place within the area inside that fencing.

Reason: To protect the surviving earthworks of the windmill mound.

- 2 Prior to any demolition and the commencement of the development a professional archaeological organisation acceptable to the Local Planning Authority shall prepare an overarching Archaeological Written Scheme of Investigation, relating to the application site area, which shall be submitted to and approved in writing by the Local Planning Authority.

Reason - To safeguard the recording of archaeological matters within the site in accordance with the NPPF (2018).

- 3 Following the approval of the Written Scheme of Investigation referred to in condition 2, and prior to any demolition on the site and the commencement of the development (other than in accordance with the agreed Written Scheme of Investigation), a staged programme of archaeological evaluation and mitigation shall be carried out by the commissioned archaeological organisation in accordance with the approved Written Scheme of Investigation. The programme of work shall include all processing, research and analysis necessary to produce an accessible and useable archive and a full report for publication which shall be submitted to the Local Planning Authority.

Reason – To safeguard the identification, recording, analysis and archiving of heritage assets before they are lost and to advance understanding of the heritage assets in their wider context through publication and dissemination of the evidence in accordance with the NPPF (2018).