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DEVELOPMENT MANAGEMENT ADVICE

To: Liz Beard
Organisation: Sefton Council

From: Lesley Bye

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Mersey Tidal Power Project, River Mersey, Liverpool, Neighbouring Authority Consultation regarding Environmental Statement (ES) and the scoping opinion for the proposed Mersey Tidal Power Project Scoping Consultation

1. Thank you for consulting Merseyside Environmental Advisory Service in respect of this EIA Scoping Consultation. The proposals comprise: a tidal range barrage located within the channel of the Mersey Estuary; an onward grid connection to a National Grid substation or other substations; and utilisation of the surrounding port facilities during the construction phase in addition to other potential associated developments which may support the construction phase.
2. Having reviewed the application and supporting documentation, our advice is set out below.
 - Part One deals with issues of regulatory compliance, action required **prior to determination** and matters to be dealt with through planning conditions. Advice is only included here where action is required or where a positive statement of compliance is necessary for statutory purposes.
 - Should the Council decide to adopt an alternative approach to MEAS Part 1 advice, I request that you let us know. MEAS may be able to provide further advice on options to manage risks in the determination of the application.

In this case Part One comprises paragraphs **3 to 71**. There is no Part Two.

Part One

3. The advice below is provided for incorporation into Sefton Council's integrated response to the Scoping Consultation.

4. In providing our advice, I wish to declare that part of the Merseyside EAS team is advising the Mersey Tidal Power team from a compliance and evidence matters perspective. The officers involved in the preparation of this Scoping Consultation response have not been involved in the advisory capacity to the Mersey Tidal Power team.

EIA Methodology

5. The applicant has submitted an EIA Scoping Report (*Mersey Tidal Power, EIA Scoping Report, Mersey Tidal Power, September 2024*) which has been reviewed and forms the basis for this response.
6. The Environmental Statement that supports the planning application should include the following sections as a minimum:
 - A non-technical summary;
 - Detailed scope of works;
 - Reference to key plans and legislation. It is essential that all relevant guidance and policies be complied with as appropriate;
 - Detailed baseline review (associated with all development issues); and
 - Detailed integrated assessment of all environmental impacts. This assessment needs to take into account the nature of impact (importance, magnitude and duration – quantified as appropriate), reversibility of impact, mitigation, monitoring measures (including reference to long-term management and maintenance measures/plans) and residual impacts.
7. It is important that the conclusions of the environmental impact assessment are transparent, and that all information used to draw conclusions is clearly presented and objective (including survey/assessment results) to enable third party verification.
8. The scoping phase of an Environmental Impact Assessment (EIA) presents the best opportunity to ensure that all the environmental impacts of a development are considered at an early stage. The EIA should also make a clear distinction between construction, operational and (if appropriate) decommissioning impacts and include a statement with regard to the phasing and timing of works for all site areas.
9. It is important that an integrated approach is taken to the EIA methodology to ensure consideration of interactions and in-combination effects. In addition, it is necessary to ensure that the results of the assessment are used to inform development design and the master plan.
10. A parameter-based ‘design envelope’ approach has been adopted for the purposes of EIA Scoping and subsequent Environmental Impact Assessment. The design envelope is to be refined as the Project evolves. At this stage, a maximum envelope has been used, with maximum parameters provided within the Scoping Report where relevant. The assessments contained within the EIA Scoping Report therefore assess a worst-case scenario or present options, including a worst-case option. This is an acceptable approach, although any increases to the parameters would require further assessment.

Chapter 30. Materials and Waste

11. This Chapter has been reviewed. It is noted that further desk-based studies and analysis will be undertaken to review and update baseline information, identify and

assess materials and waste receptors in accordance with the prescribed methodology – this is welcomed.

12. Potential affects from disposal and recovery of waste associated with the Project decommissioning have been ‘scoped out’. It appears unclear from the EIA Scoping Report whether the barrage will be removed at the decommissioning stage. Some sections of the EIA Scoping Report stating that whole scale decommissioning is not appropriate whilst other sections of the Scoping Report appear to imply that it will be removed. Clarification is required together with further justification for scoping out at this stage should there be the potential for substantial/whole scale decommissioning.

Cumulative Impacts

13. Chapter 31 includes details of the Cumulative Effects Assessment. This appears comprehensive and includes both inter and intra-project effects. A separate chapter is proposed for cumulative effects covering both inter and intra-project effects. Information will be drawn from the individual topic considerations; a consistent approach needs to be adopted to ensure that all cumulative effects are considered.

Chapter 13. Terrestrial Ecology and Biodiversity

14. A number of the EIA Scoping Report chapters feed into the Terrestrial Ecology and Biodiversity Chapter, these have been considered to inform these comments:

- 5. Coastal processes
- 6. Benthic ecology and plankton
- 7. Invasive non-native species
- 8. Marine mammals
- 9. Marine and intertidal ornithology
- 10. Fish and shellfish
- 12. Underwater noise and vibration

15. The following updates to Table 13.1 are required:

Guidance Reference	Required updates
Chartered Institute of Ecology and Environmental Management (CIEEM) (2018, updated 2019) Guidelines for Ecological Impact Assessment in the UK and Ireland: Terrestrial, Freshwater, and Coastal. Second Edition v1.1.	Amendment of the date and version to the most recent which is April 2022 Version 1.2
Guidelines for Preliminary Ecological Appraisals (PEA): Second Edition (2017)	Inclusion of the author: Chartered Institute of Ecology and Environmental Management (CIEEM)

Designated Sites and Species Records

16. It is noted that no Local Records Centre Record data search was carried out for species records within the scoping area or for non-statutory designated sites. Local Wildlife Sites (LWS) have not been included in this scoping EIA chapter and so have not been assessed. Also, there is no figure showing the locations of these sites.

Embedded Measures

17. A number of amendments are required to the Embedded Measures Table 13.9:

- ID OM5 (line 2) - there is a missing reference to sites of local importance.
- ID OM1 - an outline CEMP is proposed, to be prepared and submitted as part of the ES. It is worth noting that HRA may require elements of the OCEMP to be more detailed to provide sufficient detail for the Competent Authority to assess the HRA.

Likely Significant Terrestrial Ecology and Biodiversity Effects

18. There is a limitation with Table 13.10 under 'Further Data Baseline Requirements' - '*Protected species surveys the presence/likely absence of relevant qualifying species associated with the designated sites.* This covers the designated sites receptors, however, for standalone protected species there are no further surveys included.

Terrestrial Ecology Receptors- Scoping Out

19. Paragraph 13.10.11 states '*It is likely that potential effects associated with the use of the Port and Marine Facilities can be scoped out from further assessment in terms of non-statutory designated sites, freshwater watercourses, and associated species (fish etc.), badger, hazel dormouse, other mammals and reptiles. This is due to those elements not being local to or likely to be found at the Port and Marine Facilities.*' Whilst a number of the species listed above may not be present in these areas, I consider these should not be scoped out at this stage for the following reasons:

- no ecological data is provided for these areas;
- non-designated sites have not been mapped or assessed;
- there is no site-specific construction information regarding the use of these Facilities; and
- with regard to the following statement, '*Whilst there will be some construction activities here associated with the grid connections, in general (cable route, landfall etc.), the existing infrastructure would be utilised at these locations and no further construction activities would be necessary.*' it is unclear whether construction activities will be required.

Biodiversity Net Gain

20. The need for Biodiversity Net Gain is acknowledged within this chapter and it is confirmed that a BNG Strategy and HMMP would be required. However, there is no outline information provided about potential loss of habitats or potential mitigation or compensation at this stage. It is advised that BNG is designed into the options/detailed design stage as early as possible.

Terrestrial Ecology Figures

21. Figure 13.5 Ancient Woodland and Habitats of Principal Importance: There are a number of habitats identified with varying shades of purple which makes it difficult to differentiate between them. There is a habitat entitled '*No main habitat but additional habitats present*'- clarification is required as to what Habitat of Principal Importance this is.

Chapter 7. Invasive Non- Native Species

22. This chapter has been reviewed. Data from NBN has been used for the baseline, however, the Chapter acknowledges both the usefulness of this and also its limitations. The Chapter confirms that further data will be gathered and assessed for the next stage - this is welcomed.
23. I have no further comments to make on this Chapter.

Commitments Register (Appendix 3.1)

24. A review of the Commitments Register has been undertaken. It is considered that there should be a review for further chapter cross referencing for the next stage of assessment. A number of additional chapters have been suggested due to the relationships between them. A number of amendments are also included:
- ID OM5 (line 2) - there is a missing reference to sites of local importance.
 - ID OM8 - Construction Noise Management Plan. Add reference to Chapter 13 Terrestrial Ecology and Biodiversity and Chapter 8 Marine and Intertidal Ornithology.
 - ID OM9 - Marine Mammal Mitigation Plan, however this commitment also includes a reference to fish?
 - ID 13.6 - Lighting Strategy references Chapter 13 Terrestrial Ecology and Biodiversity and construction only. Operational lighting may have an impact on terrestrial ecology. Also, Construction and Operational lighting may also impact Chapter 8 Marine and Intertidal Ornithology.
 - ID 19.10 - Major surface water crossings for the grid connection will be designed to minimise disruption to hydrological processes and riparian and aquatic habitats. Chapter 13 (Terrestrial Ecology and Biodiversity) to be added.
 - ID19.11 - Direct grid connection within 10m of a water courses. Chapter 13 Terrestrial Ecology and Biodiversity to be added.
 - ID 19.12 - Works within 10m of water course for grid connection. Inclusion of Chapter 13 Terrestrial Ecology and Biodiversity plus for Construction and Decommissioning .
 - ID 21.1 - Air quality . Add reference to Chapters 13 Terrestrial Ecology and Biodiversity and Chapter 9 Marine and Intertidal Ornithology.
 - ID 22.2 - Target design criteria for operational fixed plant equipment. Add reference to Chapters 13 Terrestrial Ecology and Biodiversity and Chapter 9 Marine and Intertidal Ornithology.
 - ID 23.7 - Routing of Grid Connection through agricultural land. Add reference to Chapter 9 Marine and Intertidal Ornithology in regard to potential Functionally Linked Land.
 - ID 25.6 - *'Avoid use of open cut cable line techniques across sensitive habitat such as rivers and streams. Use of Horizontal directional drilling (HDD) techniques to be employed to avoid significant impacts on sensitive landscape receptors.'* Chapter 25 Seascape, Landscape and Visual is included only. Chapter 13 Terrestrial Ecology and Biodiversity should be added.

General Observations on the Scoping Report

25. I make the following general observations:

- Volumes (2a, 2b and 2c) all have the same index of Figures although they refer to different chapters.
- Volume 3 Appendices – the contents page numbers do not match appendices page numbers reports within.
- The word RAMSAR is in the following paragraphs of the Scoping Chapters reports: 2.3.18, 19.7.15, 23.6.32, 23.6.66, 23.6.98, and 23.7.4) and it is noted that this word is not an acronym and should be written as Ramsar.
- There is no reference to Marine Net Gain. It is advised that this, along with Biodiversity Net Gain, should be taken into consideration at the earliest stage possible so these can be incorporated into the design of the overall project.

Habitat Regulations Assessment (HRA)

26. The proposed Mersey tidal barrage is to be located at a currently undefined location within the Mersey Estuary. The development site is near to the following national and international sites located within Sefton. These sites are protected under the Conservation of Habitats & Species Regulations 2017 (as amended) and Local Plan policies NH2 and NH4 apply:

- Sefton Coast SAC;
- Ribble and Alt Estuaries SPA;
- Ribble and Alt Estuaries Ramsar site;
- Mersey Narrows and North Wirral Foreshore SPA;
- Mersey Narrows and North Wirral Foreshore Ramsar site;

27. The EIA scoping includes Habitats Regulations Assessment (HRA) Test of Likely Significant Effects (Appendix 3.3).

28. The project is also close to the following coastal or estuarine SSSI located within Sefton, which are of relevance due to overlapping designation features with the internationally designated sites and Local Plan policies NH2 and NH4 apply:

- Mersey Narrows SSSI;
- Sefton Coast SSSI;
- Ribble Estuary SSSI.

29. As a general point many fundamental project elements are yet unknown, such as barrage location, water levels, connection points. In addition, much of the survey evidence base which will be required to inform the HRA such as non-breeding bird survey or benthic and plankton surveys are currently on going. Therefore, the HRA is currently relatively broad and lacks much of the detailed evidence base that is required for a full HRA.

30. A number of EIA Scoping Report chapters feed into the HRA, these have been reviewed and inform these comments, these include:

- 5. Coastal processes

- 6. Benthic ecology and plankton
- 7. Invasive non-native species
- 8. Marine mammals
- 9. Marine and intertidal ornithology
- 10. Fish and shellfish
- 12. Underwater noise and vibration

31. The HRA identifies and assesses designated sites which are designated for marine element such as fish and marine mammals. We defer to the relevant marine and fisheries organisations and experts on these matters.

General overarching comments on the HRA

32. It appears unclear from the EIA Scoping Report whether the barrage will be removed at the decommissioning stage. Some sections of the EIA Scoping Report stating that whole scale decommissioning is not appropriate whilst other sections of the EIA Scoping Report appear to imply that it will be removed. Clarification is required. The EIA Scoping Report and HRA discuss decommissioning, both state that whole scale decommissioning is not appropriate given the length of operational life and the environmental equilibrium which will have established during this time. However, is no guarantee that any environmental equilibrium will be positive or neutral against the current baseline at the Mersey Estuary scale (accepting that some compensation may have been delivered). There currently seems to be no commitment to look at restoration options based on the outcome of monitoring over the operational phase of the development. Restoration to a positive equilibrium should be the goal. A decommissioning plan which includes a commitment to review decommissioning options and return the estuary to a positive state is required. In addition, if there is no commitment to remove the barrage, who will maintain it? The EIA Scoping Report states that decommissioning timescales are just twelve months which seem optimistic.

33. The HRA correctly identifies the relevant internationally designated sites within and around the Mersey Estuary, the Liverpool City Region including Sefton. Designated sites from the wider UK and Ireland are included within the HRA Test of Likely Significant Effects (TOLSE), however they are screened out based on maximum foraging distances. However, I consider that as impacts to designated sites and available mud and sandflats during construction and operation of the barrage are not known they should not be screened out. The barrage may result in reduced bird carrying capacity of the Mersey Estuary and as a result of the project may be reduced displacing birds to other estuarine and coastal sites within the UK and Ireland, or require compensation within other estuarine and coastal sites. Consideration of displacement of birds to other sites is required within the HRA. This also relates to the in-combination scope which is discussed below.

34. The EIA scoping chapters address likely significant effect (LSE) and state that they will consider only those impacts where there is a risk of a likely significant effect in EIA terms. Measures of magnitude and significance of impact in EIA terms are also discussed. How are HRA thresholds of LSE and impacts to site integrity to be measured and how will these align with EIA measures of significance? The ES will need to ensure integration with LSE in HRA terms and ensure that any LSE scoped out in EIA terms are not automatically discounted from the HRA.

35. In combination assessment has been undertaken and concludes no likely significant in combination effects. This appears to be premature given the lack of project details and currently incomplete evidence base. In addition, at such an early stage of the project all relevant plans and projects are not known. The in-combination assessment states that a full planning search was not undertaken. The in-combination assessment currently has gaps and the following plans and projects should be scoped into the in combination assessment:
- Local Plans for Halton, Sefton, West Lancashire, Fylde and Cheshire West as all are within the study area;
 - Liverpool airport expansion – this has the potential for in combination effects due to the potential loss of functionally linked land associated with the Mersey Estuary SPA and Ramsar and potential compensatory habitat requirements.
 - Relevant Shoreline management plans.
36. Project details are not yet known and therefore impacts to the designated sites within and around the Mersey Estuary in terms of bird carrying capacity are also unknown. Therefore, the scope of the in-combination effects needs to be widened to other estuary development around the UK and Ireland where they are designated or provide Functionally Linked Land (FLL). Currently the scope of in combination TOLSE is only 30km for NSIPs which is not considered to be sufficient. This will be particularly important if HRA progresses to the assessment of alternatives stage.

HRA detailed comments

37. The barrage scheme proposes to provide active travel providing a source of recreation and tourism. The potential for recreational pressure on the designated sites is not currently considered. This is likely less of a potential impact for the designated sites within Sefton (Sefton Coast SAC and Ribble and Alt Estuaries SPA and Ramsar sites) however, recreational pressure needs to be scoped into the HRA TOLSE.
38. Initial hydrodynamic modelling indicates that changes to the extent of the intertidal zone would primarily be upstream of the Project with minimal changes in extent seaward of the barrage. However, changes in sediment transport may impact the supply of sediment to the Sefton Coast SAC sand dune system and intertidal areas of the Ribble and Alt Estuaries SPA and Ramsar sites. Table 7-1 the summary of LSE does not include changes to sediment processes which may affect the dune systems of the Sefton Coast SAC and this should be updated.
39. The need for any compensation for HRA or BNG impacts is not considered as part of the TOLSE. Will for instance Functionally Linked Land farmland be required to create wetland to offset any impacts to designated sites and where will BNG offsite requirements be located?
40. An outline CEMP is proposed, to be prepared and submitted as part of the ES. It is worth noting that HRA may require elements of the OCEMP to be more detailed to provide sufficient detail for the Competent Authority to assess the HRA.
41. HRA presence of artificial lighting only considers maintenance vehicles and vessels and does not consider lighting of the barrage during operation.

42. Zone of influences of 10km and 20km are used, however these need to be fully evidenced and species specific.
43. Review of supporting chapters identified the following which need consideration within the HRA:

Chapter 5. Coastal processes

44. The coastal process chapter will be key to understanding and assessing impacts to designated sites under HRA. Studies, surveys and modelling should ensure that they provide sufficient evidence base to inform HRA.
45. The coastal processes chapter states that modelling undertaken using *E. coli* as an indicator for sewage behaviour in the Mersey Estuary during a storm event showed significant increases in concentration of this tracer compared with baseline for some barrage scenarios. The Scoping Report states that as sewage discharges are likely to be one of the principal sources of inorganic nutrients (particularly nitrogen and phosphorus) entering the impounded area created by the barrage, the potential for changes in nutrient concentrations in the estuary as a result of the Project will be assessed. Changes in nutrient concentrations combined with a reduction in suspended solids concentrations, may affect phytoplankton growth. This may impact on prey items within the designated sites and should be assessed within the HRA. The HRA should also consider how might other sewage pollutants impact on prey and qualifying species.
46. The coastal processes chapter also notes that the barrage could result in changes in retention time of estuary water, leading to settlement of suspended solids increasing water clarity, leading to increased phytoplankton growth. This has been carried forward into the HRA.

Chapter 6. Benthic ecology and plankton

47. The benthic ecology and plankton ES chapter will consider only those impacts where there is a risk of a likely significant effect in EIA terms. However, this may not be the same as LSE in HRA terms. The ES will need to ensure integration with LSE in HRA terms. Survey effort and assessment of impacts which may be considered LSE in HRA terms should not be scoped out.
48. Table 6-4 provides value criteria for benthic ecology and plankton. High and medium value are defined as features of an internationally /nationally designated site. However, this definition should be widened to those features which support internationally /nationally designated site features. This would ensure populations which support designation features, or these sites are given appropriate weighting even when not specifically identified as a designation feature in their own right but are integral to the designation.
49. Noise and vibration is scoped out of ES in relation to benthic ecology and plankton, however reasoning appears to relate to noise only. The scoping report states (paragraph 6.11.7) that sparse information is available in relation to potential effects of underwater noise and vibration on benthic and plankton species. The scoping predicts these impacts to be short term (<1 year). However, I disagree with this assessment. There are likely to be multiple activities over the construction period of 7-10 years which produce noise and vibration and the cumulative and in combination effects of this on

benthic and plankton species requires consideration, particularly as it relates to prey items for qualifying bird species of the designated sites and therefore a HRA issue. I note noise and vibration is scoped into cumulative effects.

50. Chapter 12 Underwater Noise and Vibration states that assessment will be made for marine mammals and fish as published thresholds exist. However, there are no other widely used quantifiable underwater sound pressure level threshold criteria for benthic ecology receptors, any relevant marine ornithology receptors (i.e. diving birds and their subsequent underwater noise exposure), and any other marine users (i.e. human divers and swimmers). Consequently, the potential underwater noise effects on receptors without quantifiable criteria will be addressed qualitatively in conjunction with the respective aspect chapters. Therefore, noise and vibration effects should be scoped in to both the Benthic ecology and plankton and ornithological chapters of the ES. The lack of published thresholds brings in an element of uncertainty in predicting impacts to qualifying bird species and the benthic communities on which they feed. How will this level of uncertainty be addressed by the ES?
51. In relation to noise and vibration I note that a number of embedded environmental measures are proposed, and this is welcomed (Table 12-2).
52. Prey availability surveys commenced July 2024 and will cover a period of 12 to 24 months. How will survey length be determined?

Chapter 9. Marine and intertidal ornithology

53. I note that Natural England has advised on the need for three years of non-breeding bird survey and that they should be used to inform project location and design to ensure the least damaging option. I agree with Natural England advice and the methods proposed by them. Natural England has requested nocturnal surveys. However, the EIA scoping states they have been scoped out as there would be no value in undertaking these surveys, due to foraging activity not being dictated by diurnal patterns. GPS tagging also ruled out. Further discussion with Natural England should be undertaken so that agreement on survey requirements is reached. If Natural England advice is not followed, then clear evidence and reasoning for this should be presented within the ES.
54. Table 9-4 defines conservation value levels and are appropriate, however, it needs to be clear how they relate to HRA tests of Likely Significant Effects and Adverse effects on site integrity. Table 9-5 defines sensitivity; will this be set per species based on available literature. Table 9-6 and Table 9-7 define magnitude and significance, it would be useful to relate these measures to HRA thresholds so there is clear understanding.
55. Table 9-8 lists key sources of data, it includes BTO Webs reports online, does this include full WeBS data search? This would be expected.
56. Table 9-16 lists potential significant effects and scopes them in or out of the ES. I make the following comments:
 - Maintenance vehicles and vessels – Noise disturbance scoped out, however, I do not think it can be at this stage as it will depend on location and proximity to qualifying bird feature roosts and feeding locations.

- Abrasion / disturbance to the substrate is also scoped out. Given lack of certainty on location I do not think it can be at this stage.
- A number of potential pathways from release of contaminated sediments from disturbed bottom sediments are scoped out due to lack of pathway, however, a pathway exists via prey items and therefore should not be scoped out.

57. Project pathways identified for indirect effects on birds resulting from impacts on prey element of (Table 5-7) does not include changes to water flow regime which may impact retention of pollutants such as sewage for longer, or the effects of settlement and potential or increased water clarity.
58. Dredging could contribute towards a marine enhancement project. This should be informed by impacts of the project and ecological requirements.

Chapter 17 Marine Archaeology and Cultural Heritage

59. Paragraph 17.6.2 states “*An initial desk-based review has been undertaken of publicly available data sources...to determine the baseline character of the study area and inform the assessment process*”
60. However, the Merseyside Historic Environment Record (MHER) which is the primary publicly available source of archaeological data has not been consulted. The MHER should be consulted to inform any further assessment.
61. The likely significant effects as presented in Table 17-4 are agreed.

Chapter 18 Terrestrial Archaeology and Cultural Heritage

62. Paragraph 18.6.7 states “*An initial desk based review has been undertaken of publicly available data sources ... to determine the baseline character of the Study Area and inform the assessment process.*”
63. The Heritage Gateway was consulted despite the home page stating “*Please note that local HER records contain much more detailed information than is currently available here. Please contact the relevant authority direct for all planning matters or queries relating to their records.*”
64. However, the MHER which is the primary publicly available source of archaeological data has not been consulted. The MHER should be consulted to inform any further assessment.
65. Table 18-3 *Relevant mitigation measures embedded into the project design* presents a list including ID 18-1 – “*Hazards to known heritage assets, e.g. designated or undesignated significant historic buildings and areas of archaeological remains, ...*” A definition or justification for the use of *significant* in relation to undesignated (non-designated) historic buildings and areas of archaeological remains should be provided.
66. The likely significant effects as presented in Table 18-4 *Potential significant effects and effects scoped out of assessment* are agreed.
67. However, Section 18.10.4 discusses decommissioning stage effects and considers that “*For buried heritage assets, the main impact would occur during construction*

stage (excavation of the cable trench and working width). Additional further impact through decommissioning is unlikely and therefore the effects are considered insignificant.”

68. The accuracy of this statement cannot be proven prior to the assessment and investigation of the archaeological resource and detail of the decommissioning works is presented.
69. Very limited archaeological information has been provided at this stage and insufficient data to determine whether archaeology should be scoped in or out of the EIA. However, the suggestion of the presence of prehistoric findspots, evidence of Roman activity and medieval occupation (18.6.7) would suggest archaeology of regional importance could be present and on this basis archaeology should be scoped into the ES. Therefore, the proposal to undertake an archaeological desk-based assessment to inform the EIAR (*Section 18.13.1*) is welcomed.
70. I advise that the desk-based assessment (including a walkover survey) should determine the significance of any archaeology present through a statement of significance and assess the impact of the proposed development on that significance. The potential for previously unknown archaeological remains should also be assessed.
71. The scope of the DBA should be agreed with the MEAS Planning Archaeologist. It should include the Prehistoric through to the Industrial and Modern Periods. The results of the DBA should be used to inform further advice and action to avoid or mitigate, loss or damage to any significant archaeological remains. This might include requirements for further investigation of the site, whether by means of non-intrusive (i.e., geophysical survey) or intrusive (trial trenching) archaeological techniques. MEAS will be able to provide further advice once the DBA has been submitted.

I would be pleased to discuss these issues further and to provide additional information in respect of any of the matters raised.

Lesley Bye
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