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Environment Agency

Planning Inspectorate
oxfordshiresrfi@planninginspectorate.gov.uk

Reference: OR-0013971/01
Customer reference: TR050008

26 October 2026

Oxfordshire Strategic Rail Freight Interchange – Development Consent Order Application

Land west of the B430, east of Upper Heyford Former Airfield, and south of the village of Ardley

Deadline 2, 26 October 2026

Dear Sir/Madam,

This response constitutes the Environment Agency's Deadline 2 response in relation to the following matters:

1. Comments on Applicant's documents submitted at Deadline 1 (including revised Draft Development Consent Order)
2. Examining Authority's written questions and requests for information (ExQ1) [PD-006]

Appendix 1 provides a summary of our position on each of the issues raised in our Relevant Representation [RR-042] at this deadline. Appendix 2 provides a summary of our overall position across topic areas relevant to our remit.

1. Comments on Applicant's documents submitted at Deadline 1 (including revised Draft Development Consent Order)

5.3 Other Consents and Licences Statement (Rev 2) [REP1-012 / REP1-013]

The revised Other Consents and Licences Statement as submitted at Deadline 1 no identifies the requirement for a Flood Risk Activity Permit (FRAP). The Applicant has also confirmed in this document that they are not seeking to disapply the requirement for FRAPs in the DCO. As such, our RR issue EA08 (Flood Risk Activity Permitting Requirements) is now resolved.

Whilst the requirement for water discharge permit has now been identified in the Other Consents and Licences Statement (Rev 2), this is only for the construction phase in the updated document. Our original issue, EA46 (Potential Requirement for Water Discharge Activity Permit), in our Relevant Representation [RR-042], concerned both "construction and operational water discharge activities". We responded to the Applicant comments submitted in PDA-009 in our Deadline 1 submission [REP1-020], to query their position that Water Discharge Activity Permits would not be required during the operational phase. Until we get a response to explain the basis for this reasoning this issue remains unresolved.

Revised Draft Development Consent Order (Rev 2)

Documents reviewed:

- 3.1 Draft Development Consent Order (Rev 2) [REP1-003 / REP1-004]
- 3.2 Explanatory Memorandum (Rev 2) [REP1-005 / REP1-006]
- 3.5 DCO Schedule of Changes (Rev 1) [REP1-009]

Article 2 - list of excluded operations in the definition of 'commence'

Amendments have made to the list of excluded operations in the definition of 'commence' (i.e. pre-commencement activities), with an explanation provided in the updated Explanatory Memorandum (Rev 2) [REP1-005 / REP1-006] and DCO Schedule of Changes (Rev 1) [REP1-009].

"Geotechnical and ground investigation works" has been removed from the list of pre-commencement activities, meaning they are considered as commencement activities and are therefore controlled by the Construction Environmental Management Plan (CEMP), secured under Requirement 10, but "investigations for the purposes of assessment of ground conditions" remains on the list. These two activities are very similar in nature, therefore it is not clear why one has been removed but one remains as a pre-commencement activity.

This means that "investigations for the purposes of assessment of ground conditions" would not be controlled by the CEMP. It is not clear what management systems will be in place to manage risks to the environment from pre-commencement activities. In the absence of appropriate mitigation and management measures, these activities could result in adverse impacts to controlled waters. Furthermore, the Environment Agency remains not listed as a named consultee for the discharge of Requirement 10 (Construction Environment Management Plan).

As such, issue EA01 (Requirement 10 (Construction Environmental Management Plan)) and EA37 (Lack of Clarity on Controls for Pre-Commencement Activities) of our Relevant Representation [RR-042] remain unresolved.

The Applicant should clarify the mitigation and management measures that would apply to pre-commencement investigations for the purpose of assessing ground conditions and geotechnical or ground contamination investigation, and identify where these measures are secured, for example, a pre-commencement environmental management plan.

The Environment Agency should also be as a named consultee for the discharge of Requirement 10 in draft DCO.

Article 52 - Interface with waste operation permits

The Environment Agency has been able to accept most of the applicant's proposed revisions to Article 52. We have proposed some further final amendments, particularly in relation to the determination period and surrender requirements, and have sent revised drafting to the Applicant's solicitor for consideration. We await their response.

As such, issue EA07 (Article 52 – Interface with Waste Operation Permits) of our Relevant Representation [RR-042] remains unresolved.

Requirements 28 and 29

Requirement 28 and Requirement 29 have been updated in in the draft DCO (Rev 2) to include the Environment Agency as a named consultee. This resolves issue EA04 (Requirement 28 (Contamination Risk – Previously Unidentified Contamination)) and EA05 (Requirement 29 (Contamination Risk – Verification Investigation)) of our Relevant Representation [RR-042].

2. Comments on ExQ1 [PD-006]

We have responded to the questions addressed to the Environment Agency or all Interested Parties insofar as they relate to our remit (Q1.1.1, Q1.4.11, Q1.8.14, Q1.8.26 and Q1.12.5). We have also provided comments on certain questions not directed to us where we consider that our input may assist the Examining Authority.

1. General and cross-topic questions

ExQ1	**Q1.1.1**
Question to:	All IPs
Question:	**National Planning Policy Framework** All parties are requested to consider the National Planning Policy Framework published on 17 August 2026 and set out if and how any changes in government policy, would affect the consideration of the proposed developments.
Environment Agency comments:	We have considered the National Planning Policy Framework (NPPF) published on 17 August 2026 and confirm that the changes do not alter our position as set out in our Relevant Representation [RR-042]. We note NPPF Policy F8(3), in particular, which is consistent with our position on culverting under our Relevant Representation issues EA18 (Culvert Watercourse Crossings and Habitat Connectivity) and EA20 (Definition of Temporary Effects for the Water Environment), as further set out in our Deadline 1 response.

4. Compulsory acquisition, temporary possession and other land or rights considerations

ExQ1	**Q1.4.11**
Question to:	All parties
Question:	**New public rights of way (PRoW)** All parties are invited to comment on the applicant's decision to acquire a right over the land rather than the freehold, noting paragraph 12.8 of the Statement of Reasons [APP-143] in respect of dedication agreements.
Environment Agency comments:	The Environment Agency has no comments to make on this question.

8. Geology and ground conditions

ExQ1	**Q1.8.6**
Question to:	The applicant
Question:	**Clarification: Ardley landfill contamination assessment** With reference to paragraph 11.4.58 of the ES chapter 11 [APP-

	179], please explain what PAHs and VOC are; and their significance in respect of the leachate.
Environment Agency comments:	PAHs are Polycyclic Aromatic Hydrocarbons and VOCs are Volatile Organic Compounds. These are not specified monitoring parameters within the landfill's environmental permit. Leachate quality and levels are subject to monitoring requirements under the permit.

ExQ1	**Q1.8.14**
Question to:	The applicant and EA
Question:	**Groundwater levels** In Table 11.2 and paragraph 11.5.7 of the ES [APP-179], EA expresses concerns about impacts on groundwater levels, private water supplies and aquifers; also about encountering Artesian conditions. **to the applicant**: what progress has been made towards addressing these concerns and agreeing the necessary EA permit? **to the EA**: noting ES paragraphs 11.4.33 to 11.4.39 and paragraph 11.5.27 [APP-179], does EA have outstanding concerns, for instance in respect of excavation and/or the possible use of piled foundations? In respect of the EA permit to be agreed, please advise on progress.
Environment Agency comments:	From a groundwater protection perspective, for activities that will not be controlled by the Environmental Permit, we are working towards solutions with the Applicant. For example, the Applicant has acknowledged that a Foundation Works Risk Assessment will be included in the CEMP and phase-specific CEMPs where required. Permitting discussions are ongoing and will cover mitigation for groundwater risks associated with the excavation works. The rail corridor and road works are proposed to be located within the current cells A and B of the existing landfill. The waste will therefore be excavated to allow this construction. The excavation and removal of waste will form part of the remediation scheme for the site, which is proposed to involve reprofiling the excavated waste on top of existing cells. This reprofiling has been agreed in principle, subject to risk

	assessment. See our response to Q1.8.26 for further information. We are not aware of any other part of the development proposed on top of the existing landfill site.

ExQ1	**Q1.8.20**
Question to:	The applicant
Question:	**Ardley landfill: leachate conditions** With reference to ES paragraph 11.4.36 a. how do you know that the leachate from the landfill material is not polluting the groundwater below? b. noting that Gagle Brook runs along the eastern edge of Ardley landfill, has it been tested for leachate?
Environment Agency comments:	Surface water monitoring is undertaken in the Gagle Brook in accordance with the landfill's environmental permit. Leachate and groundwater monitoring is also undertaken as part of the permit requirements, including requirements relating to leachate levels and quality and groundwater levels and quality. Our Area Regulatory (Installations) team has confirmed that the landfill is compliant with the groundwater compliance limits and that there have been no groundwater breaches.

ExQ1	**Q1.8.21**
Question to:	The applicant
Question:	**Ardley landfill: ground gas** With reference to ES paragraphs 11.4.46 and 11.4.62 *"the proposed earthworks will disturb current management measures."* [APP-179]: a. are carbon monoxide, nitrous oxides and particulate matter also present? b. what will the effects on current gas management measures be? c. how will current gas management measures be managed during excavation and then stabilised afterwards?
Environment Agency comments:	a. The landfill's environmental permit requires carbon monoxide monitoring at in-waste monitoring points. The permit also requires monitoring of carbon monoxide and oxides of nitrogen associated with landfill gas combustion in flares or engines. There are no particulate monitoring requirements in the permit.

	b. The impacts of the proposed excavation, reprofiling and capping of the waste on landfill gas emissions and the landfill gas management measures will be required to be included in a landfill gas risk assessment and gas management plan as part of the permit application. c. This is expected to form part of the restoration / remediation strategy to be submitted as part of the permit application.

ExQ1	**Q1.8.26**
Question to:	The applicant and EA
Question:	**Ardley Landfill: remediation strategy** Paragraph 11.5.9 of the ES [APP-179] says that *"For works within Ardley Landfill, a detailed Remediation Strategy will be prepared to meet EA requirements and comply with EA permit / licensing requirements"* and that *"ES Appendix 13.1 Landfill Reprofiling Technical Note provides an overview of the works proposed."*. With reference to licensing and any other requirements, what has been agreed, and what is outstanding/not agreed?
Environment Agency comments:	We have agreed that reprofiling can proceed in principle, subject to risk assessment. However, this position is strictly contingent on the Applicant demonstrating, through robust, site-specific evidence, that any disturbance of waste will not increase emissions or the risk of emissions compared with current conditions ('the status quo'), as set out in permitting pre-application advice provided to the Applicant on 8 January 2026. We have not agreed any other aspects of the permitting requirements. All aspects of the variation will be agreed through the determination of the proposed permit application. This includes the risk of gas and/or leachate generation and impacts on surface water and groundwater, in addition to any amenity issues, which we advised the Applicant of on 8 January 2026. The permitting requirements will also include the revised restoration scheme and surface water management scheme. On 13 February 2026, the Applicant provided the Landfill Gas Risk Assessment, Stability Risk Assessment and

	Hydrogeological Risk Assessment to our NPS and Permitting teams for outline review. We provided our outline comments on 3 March 2026.

ExQ1	**Q1.8.31**
Question to:	The applicant
Question:	**Ardley landfill: variation of current waste licence** Paragraph 11.5.24 of the ES [APP-179] says that *…"remodelling of the landfill will be required so that the final developed area of the Application Site does not fall within the EA licensed landfill area. The current proposal … will require a variation of the current waste license (sic). Discussions have been held with the EA to agree the exact mechanism and requirements for this …"*. a. Is this variation temporary or permanent? b. Please give an update on the discussions and any requirements, and how and where these are secured.
Environment Agency comments:	a) The variation application / partial surrender application for the landfill permit proposes to excavate and reprofile the waste so that the development Application Site does not fall within the permitted landfill area regulated by the Environment Agency. b) Please refer to our response to Q1.8.14.

12. Materials and waste

ExQ1	**Q1.12.2**
Question to:	The applicant
Question:	**Clarification: Ashgrove Farm in-vessel composting (IVC) facility currently operated by Biffa** In response to point 2.3.2 of the ES Scoping Opinion, Table 2.1 of the ES says that *"The IVC facility is no longer included as part of the Proposed Development …"* but para 2.2.3 says that *"Also within the Main Site is the Biffa operated 'In-Vessel Composting' (IVC) Facility …"* and bullet point 7 of paragraph 2.3.1 says that *"the IVC Facility will be demolished after the lease ends in 2030 …"*. Please explain and/or signpost a. how and in what condition the IVC food and waste composting facility would be left at the point when Biffa vacates the site; b. what cleanup would be required; c. who would do the cleanup;

	d. what residual contamination there would be; e. how this has been assessed in the ES.
Environment Agency comments:	It would be for the operator to ensure that any required clean-up is undertaken and that the site is returned to its original condition. Rule 3.1.4 of the SR2021 No 4 standard rules permit, under which the site is regulated by us, states: "Periodic monitoring shall be carried out at least once every 5 years for groundwater from the date of this permit issue, and 10 years for soil from the date of this permit issue, unless such monitoring is based on a systematic appraisal of the risk of contamination." Standard rules environmental permit: SR2021 No 4: composting in closed systems – installations - GOV.UK

ExQ1	**Q1.12.4**
Question to:	The applicant
Question:	**Clarification: Storage of fuel, oil and other chemicals** Paragraph 17.2 of the CEMP [APP-189] makes reference to PPG7 for above ground storage tanks and PPG22 for spills. Please confirm that: a. you are referring to Pollution Prevention Guidance documents PPG7 The safe operation of refuelling facilities; and PPG22 Dealing with spills; PPG7 was withdrawn on 14 December 2015; please advise b. what has replaced PPG7; c. whether PPG22 is still current and, if not, what has replaced it.
Environment Agency comments:	The Examining Authority is correct that PPG7 was withdrawn on 14 December 2015. The Environment Agency no longer provides 'good practice' guidance through formal Pollution Prevention Guidance (PPG) documents. These have been replaced by general guidance, such as Oil storage regulations for businesses - GOV.UK. However, the archived Pollution Prevention Guidance webpage ([ARCHIVED CONTENT] Pollution prevention guidance (PPG) - GOV.UK) notes that, although PPG22: Dealing with spills is archived, it still provides up-to-date good practice.

ExQ1	**Q1.12.5**
Question to:	The applicant, OCC, EA

Question:	**Ashgrove Farm in-vessel composting (IVC) facility currently operated by Biffa** We note from the OCC relevant representation [RR-109] Annex 1 paragraphs 113 to 117 and from ES Tables 13.2 and 13.3 [APP-181] that i. removal of the Ashgrove Farm IVC facility currently operated by Biffa would create a potential conflict with the Oxfordshire Minerals and Waste Local Plan policy W11; ii. a full Waste Needs Assessment needs to be prepared (OCC RR Annex 1 paragraph 114) and iii. there is a *"lack of clarity regarding the fate of the Biffa Green Power IVC facility ..."* (ES Table 13.3, ID EA28). Noting your responses in ES Tables 13.2 and 13.3, in ES paragraphs 13.4.23 to 13.4.32 and at procedural deadline A, please explain your assessment of future need in more detail and how your approach would ensure that the shortfall created by removal of this facility would be made up, with particular reference to OCC policies W1 and W11, the current and future waste needs of neighbouring authorities and any changes needed to the current Biffa licence. OCC and the Environment Agency (EA) are invited to comment.
Environment Agency comments:	The Environment Agency has no comments to make on this question, as it falls outside our remit. We consider that the question is primarily for the Applicant and OCC, as Waste Planning Authority, as it relates to waste planning need, capacity, policy compliance (W1/W11), and how any loss of IVC capacity would be addressed.

ExQ1	**Q1.12.11**
Question to:	The applicant
Question:	**Ardley Landfill Site: existing permit** We note from section 3.4 of ES Appendix 13.1 Landfill reprofiling technical note [APP-299] that *"all the landfill works will be completed under a variation of the existing permit …so that the new rail connections and principle (sic)access are not included within the varied permit."*. We also note the voluntary land arrangements with Valencia Waste Management and that *"The Environment Agency has been extensively consulted …"*. a. do you mean the principal access to the main site (Work No 11)? b. please give an update on the current status of the proposal to vary the existing environmental permit, how

	this enables delivery of the proposed development and where the applicant's position is secured in the DCO.
Environment Agency comments:	In respect of part (b), please refer to our response to Q1.8.14.

ExQ1	**Q1.12.12**
Question to:	The applicant
Question:	**Ardley Landfill Site: monitoring** With reference to ES Appendix 13.1 Landfill reprofiling technical note [APP-299] section 4.1, please give details of the proposed access and monitoring arrangements before, during and after the proposed works to Ardley Landfill.
Environment Agency comments:	We understand that these arrangements will be included in the permit variation application.

ExQ1	**Q1.12.14**
Question to:	The applicant
Question:	**Ardley Landfill Site: existing EA licence** With reference to paragraph 12.1 of the CEMP [APP-189]: a. will any additional measures or variation of the existing EA licence be required; b. if so, in what respects?
Environment Agency comments:	We understand that these matters will be addressed through the permit variation application.

ExQ1	**Q1.12.15**
Question to:	The applicant
Question:	**Ardley Landfill Site: groundwater monitoring** With reference to paragraph 12.1 of the CEMP [APP-189]: a. is the project duration both construction and operation? b. is groundwater monitoring proposed in any other areas and, if so, how is this secured?
Environment Agency comments:	b) Insofar as groundwater monitoring is required as part of the Ardley Landfill environmental permit variation, this will be determined through the permitting process.

If you have any questions regarding our response, please contact NIteam@environment-agency.gov.uk.

Yours faithfully,

[redacted], **Planning Specialist - National Infrastructure Team**
National Contact Centre: 03708 506 506
NIteam@environment-agency.gov.uk

Appendix 1 – Summary of Environment Agency (EA) position on issues raised in Relevant Representation [RR-042] as of Deadline 2

EA RR issue	Topic(s)	Status
EA01 – Requirement 10 (Construction Environmental Management Plan)	DCO; CEMP	Remains unresolved
EA02 – Requirement 10 Phraseology	DCO; CEMP	Remains unresolved
EA03 – Requirement 22 (Flood Risk and Surface Water Drainage)	DCO; Flood risk	Remains unresolved
EA04 – Requirement 28 (Contamination Risk – Previously Unidentified Contamination)	DCO; Groundwater & contaminated land	Resolved
EA05 – Requirement 29 (Contamination Risk – Verification Investigation)	DCO; Groundwater & contaminated land	Resolved
EA06 – Discharge of Requirements Procedure	DCO	Remains unresolved
EA07 – Article 52 – Interface with Waste Operation Permits	DCO; Permitting & licences	Remains unresolved
EA08 – Flood Risk Activity Permitting Requirements	Flood risk; Permitting & licences	Resolved
EA09 – Freeboard Allowance for Warehouse Finished Floor Levels	Flood risk	Remains unresolved
EA10 – Culvert Freeboard Requirement Not Specified	Flood risk	Remains unresolved
EA11 – Hydraulic Model Representation Uncertainties – Gagle and Ashgrove Brooks	Flood risk; Hydraulic modelling	Remains unresolved
EA12 – Future Assessment of Ashgrove Brook Diversion and Culverting	Flood risk; Hydraulic modelling	Remains unresolved

EA13 – Potential Under-Representation of A43 Culvert in Padbury Brook Hydraulic Model	Flood risk; Hydraulic modelling	Remains unresolved
EA14 – Specific Fish Mitigation for In-Channel Works	Aquatic ecology; WFD; In-channel works	Resolved, subject to a satisfactorily updated CEMP being submitted
EA15 – Mitigation for Watercourse Diversions	Aquatic ecology; Watercourse diversions; CEMP	Resolved, subject to a satisfactorily updated CEMP being submitted
EA16 – Reference Point for 10m Riparian Buffer Not Defined	Aquatic ecology; Riparian habitat; CEMP	Resolved, subject to a satisfactorily updated CEMP being submitted
EA17 – Biosecurity Measures for Non-native Crayfish and INNS Management	Aquatic ecology; INNS/biosecurity; CEMP	Resolved, subject to a satisfactorily updated CEMP being submitted
EA18 – Culvert Watercourse Crossings and Habitat Connectivity	Aquatic ecology; WFD	Remains unresolved
EA19 – Padbury Brook Characterisation	Geomorphology	Resolved, subject to a satisfactorily updated ES Appendix 6.1 Ecological Appraisal Report being submitted
EA20 – Definition of Temporary Effects for the Water Environment	Geomorphology; WFD	Remains unresolved
EA21 – Incomplete Study Area Extent	Groundwater	Resolved, subject to satisfactory updated documentation being submitted
EA22 – Consistency of Groundwater Effects Considered in the Assessment	Groundwater	Resolved, subject to satisfactory updated documentation being submitted
EA23 – Inconsistent Order Limits in WFD Assessment	Groundwater; WFD	Resolved, subject to satisfactory updated documentation being submitted
EA24 – Groundwater Bodies Omitted from WFD Assessment	Groundwater; WFD	Remains unresolved

EA25 – Groundwater Dewatering and Permitting Requirements	Groundwater protection; Permitting	Resolved
EA26 – Insufficient Justification for Discounting Groundwater Risks	Groundwater & contaminated land	Resolved
EA27 – Incomplete Land Contamination Investigation Coverage	Groundwater & contaminated land	Resolved, subject to satisfactory updated documentation being submitted
EA28 – Contaminated Land Remediation Strategy – Securing Remediation of Known Contamination	Groundwater & contaminated land; Remediation	Remains unresolved
EA29 – Controlled Waters Pollutant Linkage Omitted from CSM	Groundwater & contaminated land; CSM	Resolved, subject to satisfactory updated or additional documents being submitted
EA30 – Groundwater Receptors Omitted from Construction Phase Mitigation	Groundwater protection; CEMP	Resolved, subject to satisfactory updated documentation being submitted
EA31 – Ground Contamination Assessment Commitments and Controlled Waters Risk	Groundwater & contaminated land	Remains unresolved
EA32 – Groundwater Monitoring Plan – Lack of Detail	Groundwater monitoring; CEMP	Resolved
EA33 – Groundwater Pollution Prevention Measures in the CEMP	Groundwater protection; CEMP	Resolved, subject to satisfactory updated documentation being submitted
EA34 – Foundation Works Risk Assessment Requirement	Groundwater protection; CEMP	Resolved, subject to satisfactory updated CEMP being submitted
EA35 – Permitting and DCO Interface for Landfill Reprofiling and Related Activities	Groundwater & contaminated land; Ardley Landfill; Permitting & licences	Resolved

EA36 – Alternative Management of Excavated Landfill Waste	Waste management; Ardley Landfill	Remains unresolved
EA37 – Lack of Clarity on Controls for Pre-Commencement Activities	Groundwater & contaminated land; Pre-commencement activities	Remains unresolved
EA38 – Water Quality Data	Water quality; WFD	Remains unresolved
EA39 – Outdated and Incomplete Pollution Prevention Guidance References	Water quality; Pollution prevention; CEMP	Resolved, subject to satisfactory updated documentation being submitted
EA40 – Water Quality Monitoring	Water quality; Monitoring; CEMP	Remains unresolved
EA41 – Fuel, Oil and Chemical Storage Controls	Water quality; Pollution prevention; CEMP	Remains unresolved
EA42 – Construction Wastewater Management	Water quality; Construction wastewater; CEMP	Remains unresolved
EA43 – Foul Water Management During Construction	Water quality; Foul water; CEMP	Remains unresolved
EA44 – Solar PV Materials and Operational Maintenance	Water quality; Operational management	Remains unresolved
EA45 – Operational Water Quality Pollution Sources Omitted	Water quality; Operational management	Remains unresolved
EA46 – Potential Requirement for Water Discharge Activity Permit	Water quality; Permitting & licences; Water discharge	Remains unresolved
EA47 – Operational SuDS Maintenance	Water quality; SuDS; Operational drainage	Remains unresolved
EA48 – Penstock Isolation Arrangements	Water quality; Drainage; Pollution control	Remains unresolved

EA49 – Borehole at Ardley In-Vessel Composting (IVC) Facility	Groundwater protection; Permitting (waste management)	Remains unresolved

Appendix 2 – Summary Table of Environment Agency Position



Agreed / resolved

Working on a solution / under discussion

Not agreed

Subject	Work Package / Topic	Scope	Method & Assumptions	Results of Assessment (i.e. Impact)	Mitigation / Enhancements	Securing Mechanism	Related RR Issue(s)
DCO	Requirement 10 – Construction Environmental Management Plan					Requirement 10	EA01 – Requirement 10 (Construction Environmental Management Plan); EA02 – Requirement 10 Phraseology
DCO	Requirement 22 – Flood Risk and Surface Water Drainage					Requirement 22	EA03 – Requirement 22 (Flood Risk and Surface Water Drainage)
DCO	Requirement 28 – Previously					Requirement 28	EA04 – Requirement 28 (Contamination Risk –

	Unidentified Contamination						Previously Unidentified Contamination)
DCO	Requirement 29 – Verification Investigation					Requirement 29	EA05 – Requirement 29 (Contamination Risk – Verification Investigation)
DCO	Discharge of Requirements Procedure					Procedure for Discharge of Requirements	EA06 – Discharge of Requirements Procedure
DCO	Article 52					Article 52	EA07 – Article 52 – Interface with Waste Operation Permits
Flood Risk	Flood Risk Assessment					Requirement 22	EA03 – Requirement 22 (Flood Risk and Surface Water Drainage); EA09 – Freeboard Allowance for Warehouse Finished Floor Levels; EA10 – Culvert Freeboard Requirement Not Specified
Flood Risk	Hydraulic Modelling					Flood Risk Assessment / DCO Requirement	EA11 – Hydraulic Model Representation Uncertainties – Gagle and Ashgrove Brooks; EA12 – Future Assessment of Ashgrove Brook Diversion and Culverting; EA13 – Potential Under-Representation of A43 Culvert in Padbury Brook Hydraulic Model

Flood Risk	Flood Risk Activity Permitting						EA08 – Flood Risk Activity Permitting Requirements
Aquatic Ecology	Biodiversity Net Gain Strategy						
Aquatic Ecology	Ecology Assessment						EA14 – Specific Fish Mitigation for In-Channel Works
Aquatic Ecology	Watercourse Diversions and In-Channel Works					Requirement 10 / CEMP	EA14 – Specific Fish Mitigation for In-Channel Works; EA15 – Mitigation for Watercourse Diversions
Aquatic Ecology	Riparian Habitat Protection					Requirement 10 / CEMP	EA16 – Reference Point for 10m Riparian Buffer Not Defined
Aquatic Ecology	INNS and Biosecurity					Requirement 10 / CEMP	EA17 – Biosecurity Measures for Non-native Crayfish and INNS Management
Aquatic Ecology	Water Framework Directive Assessment						EA14 – Specific Fish Mitigation for In-Channel Works; EA18 – Culvert Watercourse Crossings and Habitat Connectivity
Geomorphology	Ecology Assessment						EA19 – Padbury Brook Characterisation

Geomorphology	Water Framework Directive Assessment						EA20 – Definition of Temporary Effects for the Water Environment
Groundwater & Contaminated Land	Water Framework Directive Assessment						EA23 – Inconsistent Order Limits in WFD Assessment; EA24 – Groundwater Bodies Omitted from WFD Assessment
Groundwater & Contaminated Land	Land Contamination Assessment					Requirement 28; Requirement 29	EA04 – Requirement 28 (Contamination Risk – Previously Unidentified Contamination); EA05 – Requirement 29 (Contamination Risk – Verification Investigation); EA26 – Insufficient Justification for Discounting Groundwater Risks; EA27 – Incomplete Land Contamination Investigation Coverage; EA28 – Contaminated Land Remediation Strategy – Securing Remediation of Known Contamination; EA29 – Controlled Waters Pollutant Linkage Omitted from CSM; EA31 – Ground Contamination Assessment Commitments and Controlled Waters Risk; EA35 –

							Permitting and DCO Interface for Landfill Reprofiling and Related Activities; EA37 – Lack of Clarity on Controls for Pre-Commencement Activities
Groundwater & Contaminated Land	Groundwater Protection					Requirement 10 / CEMP	EA24 – Groundwater Bodies Omitted from WFD Assessment; EA25 – Groundwater Dewatering and Permitting Requirements; EA30 – Groundwater Receptors Omitted from Construction Phase Mitigation; EA33 – Groundwater Pollution Prevention Measures in the CEMP; EA34 – Foundation Works Risk Assessment Requirement; EA49 – Borehole at Ardley In-Vessel Composting (IVC) Facility
Groundwater & Contaminated Land	Groundwater Monitoring					Requirement 10 / CEMP	EA32 – Groundwater Monitoring Plan – Lack of Detail
Groundwater & Contaminated Land	Remediation Strategy					Requirement 28; Requirement 29	EA28 – Contaminated Land Remediation Strategy – Securing Remediation of Known Contamination

Groundwater & Contaminated Land	Pre-Commencement Ground Investigations					CEMP/Pre-commencement plan	EA37 – Lack of Clarity on Controls for Pre-Commencement Activities
Water Quality	ES Chapter 9 Water Environment						EA38 – Water Quality Data; EA45 – Operational Water Quality Pollution Sources Omitted
Water Quality	Water Framework Directive Assessment						EA23 – Inconsistent Order Limits in WFD Assessment; EA24 – Groundwater Bodies Omitted from WFD Assessment; EA38 – Water Quality Data; EA39 – Outdated and Incomplete Pollution Prevention Guidance References
Water Quality	Water Quality Monitoring					Requirement 10 / CEMP	EA40 – Water Quality Monitoring
Water Quality	Pollution Prevention					Requirement 10 / CEMP	EA39 – Outdated and Incomplete Pollution Prevention Guidance References; EA41 – Fuel, Oil and Chemical Storage Controls
Water Quality	Construction Wastewater Management					Requirement 10 / CEMP	EA42 – Construction Wastewater Management

Water Quality	Foul Water Management					Requirement 10 / CEMP	EA43 – Foul Water Management During Construction
Water Quality	Operational Drainage, SuDS and Water Quality					Operation & Maintenance Manual / Drainage Strategy	EA44 – Solar PV Materials and Operational Maintenance; EA45 – Operational Water Quality Pollution Sources Omitted; EA47 – Operational SuDS Maintenance; EA48 – Penstock Isolation Arrangements
Water Resources	Water Supply Strategy						
Water Resources	Water Framework Directive Assessment						
Waste Management	Materials and Waste Assessment					Waste Management Strategy	EA36 – Alternative Management of Excavated Landfill Waste
Permitting & Licences	Ardley Landfill					Environmental Permit; Article 52	EA35 – Permitting and DCO Interface for Landfill Reprofiling and Related Activities; EA36 – Alternative Management of Excavated Landfill Waste; EA07 – Article 52 – Interface with Waste Operation Permits

Permitting & Licences	Other Consents and Licences Statement						EA08 – Flood Risk Activity Permitting Requirements; EA46 – Potential Requirement for Water Discharge Activity Permit

END