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Dear Mr Jenkins

**Horstead with Stanninghall: Stanninghall Quarry, Quarry Road off Stanninghall Road, Horstead. Norwich, Norfolk NR12 7LX: Request for EIA Scoping Opinion: Proposed Northern Extension and Consolidation Scheme: Tarmac Southern Ltd**

I write with reference to your Scoping Request of 17 December 2019 made under Regulation 15(2) of the Town and Country Planning (Environmental Impact Assessment) Regulations 2017. Given the time lost to Christmas and New Year we agreed an extended period until 11 February 2020 and whilst I have not yet received responses from all organizations/bodies consulted, I have sufficient comments to respond and will forward on any further responses I receive.

The proposal is for the northern extension of the existing Stanninghall Quarry which is expected to yield some 4.5 million tonnes of sand and gravel from the 53 hectare site. Restoration of the whole area (both the existing quarry and proposed extension) would be to an agricultural landscape with enhanced wildlife habitat with the potential for increased biodiversity. A consolidated application will be lodged which will include the existing quarry including the plant site in addition to the northern extension area which together will form the 'project' in terms of the EIA Regulations. Although the application will be a consolidated one including both the existing quarry (including the plant site) and the extension, on the basis the extended area itself would exceed the 25 hectare threshold identified in Schedule 1 of the Town and Country Planning (Environmental Impact Assessment) Regulations 2017, this indicates and Environmental Impact Assessment (EIA) will automatically be required, and as per paragraph 2.5 of your Scoping report and you intend to voluntarily submit one to cover the whole project.

Following consultation with the statutory bodies that would be consulted on a planning application, I have set out below the scope and level of detail of the information to be provided in the Environmental Statement using the factors listed in Regulation 4(2) of the EIA Regulations. Please note that, in accordance with Regulation 18(4)(a), the Environmental Statement must be strictly based on this Scoping Opinion unless a subsequent Scoping Opinion is requested or the proposed development becomes materially different.

### Biodiversity

According to Natural England, the Scoping Request is for a proposal that does not appear, from the information provided, to affect any nationally designated ecological sites (Ramsar, SPA, SAC, SSSI, NNR).

The County Ecologist is satisfied with the approach proposed to consider biodiversity. The correct Ecological Impact Assessment (EcAA) guidelines and stages are proposed to be followed, and the developer has proposed to undertake and submit all necessary information required to determine the EIA application including restoration and monitoring schemes for the proposed quarry. The only additional information required (unless this has already been undertaken as part of the Preliminary Ecological Assessment (PEA) or Scoping and evaluation of Valued Ecological Receptors)), would be an up to date search of the local biodiversity records to ensure that the assessments are being made using the most up to date information available.

For Norfolk, the most comprehensive biodiversity records of protected and priority species and habitats for conservation are held by Norfolk Biodiversity Information Service [www.nbis.org.uk](http://www.nbis.org.uk) and details of how to obtain records can be found on their website or by contacting [enquiries.nbis@norfolk.gov.uk](mailto:enquiries.nbis@norfolk.gov.uk). Relevant information can then be used to guide the scoping and evaluation of Valued Ecological Receptors (VER).

The proposed restoration of the site would provide enhanced wildlife habitat and planting of hedgerows between fields will increase the connectivity of habitats. The restoration strategy will be further informed by the results of the landscape and visual impact assessment and ecological studies which will form part of the EIA.

### Soil

Some 50% of the proposed extension area falls within Grade 2 Agricultural Land Classification and is therefore considered the best and most versatile (BMV) agricultural land. On this basis and contrary to 6.35 of your Scoping Report, it is expected that an updated Agricultural Land Classification so a soil resources study should form part of the Environmental Statement. Impacts from the development should be considered in light of the Government's policy for the protection of the BMV as set out in paragraph 170 and 171 of the NPPF. Natural England recommends that soils should be considered under a more general heading of sustainable use of land and the valuing of the ecosystem services they provide as a natural resource, also in line with paragraph 170 of the NPPF.

General advice on the agricultural aspects of site working and reclamation can be found in the Defra Guidance for successful reclamation of mineral and waste sites:  
<https://webarchive.nationalarchives.gov.uk/20090330220529/http://www.defra.gov.uk/farm/environment/land-use/reclamation/index.htm>

### Water (Flood Risk/Management)

A Flood Risk Assessment will mandatorily be required on the basis that the site area exceeds 1 hectare in size. Along with the surface water drainage strategy, this should seek to address:

- all sources of flood risk, including those from ordinary watercourses, surface water and groundwater to the development
- how surface water drainage from the development will be managed on-site and show compliance with the written Ministerial Statement HCWS 161 by ensuring that Sustainable Drainage Systems (SuDS) are put in place
- how any phasing (if proposed) of the development will affect the overall drainage strategy and what arrangements, temporary or otherwise, will need to be in place at each stage of the development in order to ensure the satisfactory performance of the overall surface water drainage system for the entirety of the development.

This supporting information would assess the potential for the development to increase the risk of flooding from the proposal or how surface water runoff through the addition of hard surfaces will be managed. It will show how this will be managed to ensure that the development does not increase flood risk on the site or elsewhere, in line with National Planning Policy Framework (paragraph 103).

In this particular case this would include appropriate information on:

- Appropriate assessment and mitigation of sources of surface water flood risk as shown on the EA Risk of Surface Water Flooding mapping.
- Sustainable Drainage Systems (SuDS) proposals in accordance with appropriate guidance including “Non-statutory technical standards for sustainable drainage systems” March 2015 by Department for Environment, Food and Rural Affairs.
- At least one feasible proposal for the disposal of surface water drainage should be demonstrated and, in many cases, supported by the inclusion of appropriate information. It is important that the SuDS principles and hierarchies have been followed in terms of:
  - surface water disposal location, prioritised in the following order: disposal of water to shallow infiltration, to a watercourse, to a surface water sewer, combined sewer / deep infiltration (generally greater than 2m below ground level),
  - the SuDS components used within the management train (source, site and regional control) in relation to water quality and quantity.
  - identifying multifunctional benefits including amenity and biodiversity
- The drainage strategy should also contain a maintenance and management plan detailing the activities required and details of who will adopt and maintain all the surface water drainage features for the lifetime of the development.

Please note, if there are any works proposed as part of this application that are likely to affect flows in an ordinary watercourse, then the applicant is likely to need the approval of the County Council. In line with good practice, the Council seeks to avoid culverting, and its consent for such works will not normally be granted except as a means of access. It should be noted that this approval is separate from planning.

### Water (Groundwater Quality)

According to the Environment Agency (EA), the Hydrology and Hydrogeology sections (6.36 – 6.39) of the EIA scoping report are sufficiently comprehensive at this stage; dewatering requirements would have been already assessed in previous EIAs and will be updated in the Environmental Statement for this project. In terms of Section 6.38, the EA appreciates the need of liaising with them to agree the criteria for subsequent assessment, and the EA consider that assuming that numerical modelling will not be required is premature at this stage: predictive groundwater modelling is the only suitable way to assess long term future impacts on groundwater quantity and quality, groundwater dependent surface water bodies and ecosystems, as well as suitably estimated dewatering requirements for each extraction phase, and it is routinely employed in EIA studies for quarry or mining projects (new or extensions).

As part of the HIA (section 6.37) Impact Assessment, you should also consider implementing a 'source - pathway - receptor' approach to potential environmental impacts from the expansion and restoration of the site.

### Cultural Heritage (Archaeology)

The proposed application area is rich in cropmarks of field-systems, previous excavations have also produced charcoal clumps of probable Anglo-Saxon date and the site is in close proximity to the Horstead Roman Camp (a Scheduled Monument). The County Archaeologist would advise that the Historic Environment section of the EIA should consist of an archaeological desk-based assessment including the results of a geophysical Survey of the extension area.

### Cultural Heritage (Architectural)

Historic England's principal concern relates to the impact of the development upon the setting and significance of the scheduled monument situated to the north of the PDA, which is known as the '*Roman camp and settlement site W of Horstead*' (List Entry Number 1003928). This represents the remains of a rare archaeological feature in the region and an important monument type nationally.

Historic England (HE) has confirmed its view that historic environment represents a potentially significant issue in EIA terms, and agree with the applicant that the results of the assessment exercise should result in a specific Cultural Heritage chapter of the ES. HE notes the Scoping Report has identified and noted the presence of the scheduled monument in the landscape, and this is referenced in the Cultural Heritage Chapter (Chapter 6). The report also states that the applicant will undertake further analysis of this asset in the full ES, which we also support. Overall, HE also acknowledge the approach that is being considered in the Scoping Report in relation to both designated and non-designated heritage assets, and consider this will be sufficient to provide a considered heritage chapter in the ES.

HE would also wish to ensure that this chapter also sets out to address the setting of designated heritage assets as set out in the relevant planning policy statements of the NPPF, and in their view heritage specific viewpoints with both photographs and photomontages will be useful to illustrate the ES. If these are to be presented in the Landscape and Visual chapter, then the assessment needs to be clearly set out and cross referenced with the heritage chapter. Historic England's published advice in relation to setting of heritage assets would be useful in that regard (see Good Practice Advice in Planning: 3 '*The Setting of Heritage Assets*'). The setting of heritage assets is not however

just restricted to visual impacts and other factors should also be considered in particular noise, light, traffic and landscape assessments. Where relevant, the cultural heritage should therefore be cross-referenced to these other chapters, and we advise that all supporting technical information (desk-based assessments, geophysical surveys, evaluation and post-excavation reports etc.) are included as appendices.

HE also strongly recommends that the applicant involve the County's specialist advisers on archaeological matters and we recognise that they are best placed to provide advice on non-designated heritage assets and to give advice on how the proposal can be tailored to avoid and minimise potential adverse impacts on the historic environment; and of any required mitigation measures; and opportunities for securing wider benefits for the future conservation and management of heritage assets.

The assessment would need to be carried out in accordance with established policy and guidance, including the National Planning Policy Framework. The Planning Practice Guidance contains guidance on setting, amplified by the Historic England document Historic Environment Good Practice Advice in Planning Note 3, *The Setting of Heritage Assets*, which provides a thorough discussion of setting and methods for considering the impact of development on setting, such as the use of matrices. Whilst standardised EIA matrices or are useful tools, HE considers the analysis of setting (and the impact upon it) as a matter of qualitative and expert judgement which cannot be achieved solely by use of systematic matrices or scoring systems. HE therefore recommends that these should be seen primarily as material supporting a clearly expressed and non-technical narrative argument within the cultural heritage chapter. The EIA should use the ideas of benefit, harm and loss (as described in NPPF) to set out 'what matters and why' in terms of the heritage assets' significance and setting, together with the effects of the development upon them.

Given the designated heritage asset within the area, HE would welcome further discussions with the applicant in order to discuss and consider the setting issues which will need to be addressed within the EIA. In particular, HE is concerned to work with the applicant on the design of the reinstatement, and would recommend a photomontage is produced from the scheduled monument which demonstrates the proposed reinstatement scheme.

### Landscape

According to Natural England, the Scoping Request is for a proposal that does not appear, from the information provided, to affect any nationally designated landscapes (National Parks, AONBs, Heritage Coasts, National Trails). The proposed Landscape and Visual Impact Assessment (LVIA) methodology is acceptable and draws on current professional guidance. The conclusions of the LVIA should inform the screening proposals for the construction stage which are currently proposed on the Block Phasing Proposals and should also inform the restoration plan.

The submitted EIA should include a tree survey and Arboricultural Impact Assessment (AIA) and Tree Protection Plan in accordance with BS5837:2012. There are a number of mature trees in field boundaries in the proposed northern extension and also around the

edge of the site. Where these trees can be retained, there should be an adequate stand-off stipulated in the AIA and Tree Protection Plan. The restoration scheme should take account of the loss of trees and ensure net gain. We would expect that the native mixed hedgerows incorporated in the restoration scheme should be planted with standard trees at a minimum of 12m centres. The species selected should reflect a consideration of landscape resilience to climate change and pests and diseases and therefore provide an appropriate mix of species and genera.

#### Transport

Based upon the information submitted, I can confirm that the Highway Authority would require a Transport Statement (TS). The Transport Statement should include details of the amount of traffic associated with the development, an assessment of the surrounding highway network, an assessment of the recorded PIA history, the expected routing of traffic and any proposed wheel cleaning facilities / traffic management proposals.

#### Human Health

As referred to above, I have not received responses from all of the bodies consulted and this includes Broadland District Council Environmental Health Officer (EHO). The EHO would scrutinize the ES and comment on likely impacts on amenity including those from both dust and noise and you have confirmed that both will be assessed within the scope of the Environmental Statement. I will forward the EHO's response if and when I receive it.

#### Schedule 4 Information

In addition to the above information, please ensure that the Environmental Statement (ES) includes **all information** specified in Schedule 4: Information for Inclusion in Environmental Statements which, in addition to a description of the development covering points 1(a)-1(d), also which includes (but isn't limited to), a description of reasonable alternatives, a description of the relevant aspects of the current state of the environment and an outline of the likely evolution thereof without implementation of the development, a non-technical summary of the information, and a reference list detailing sources used for the descriptions and assessments included.

#### Regulation 18

Furthermore, in accordance with Regulation 18(5), in order to ensure the completeness of the and quality of the ES, it must also be accompanied by a statement from the developer outlining the relevant expertise or qualifications of such experts who have prepared the ES.

I trust the above is of use; please don't hesitate to contact me if you wish to discuss any of these points further. Please let me know if any of the statements in this letter are incorrect: as I pointed out at the start of the letter, in accordance with Regulation 18(4)(a), the Environmental Statement must be strictly based on this Scoping Opinion unless the development becomes materially different. Should you wish to view any of the consultation responses in full they are available here:

<http://eplanning.norfolk.gov.uk/PlanAppDisp.aspx?AppNo=SCO/2019/0003>

Yours sincerely



Nick Johnson (Head of Planning)