

Northamptonshire County Council  
Planning Services  
Guildhall Road Block  
County Hall  
Northampton  
NN1 1DN

**Our ref:** AN/2012/115125/01-L01  
**Your ref:** 12/00003/SCO  
**Date:** 06 August 2012

FAO Claire Spokes

Dear Madam

**Conservation stone quarry to extract Blisworth limestone blockstone, flagstone and large walling stone.  
Stone Pits Quarry, Benefield, Oundle, Northamptonshire, PE8 5AN**

Thank you for consulting us on the scoping opinion for the proposed Stonepits Quarry at Benefield, which was received on 16 July 2012.

The focus of our response is on the following environmental topics for which we are responsible:

- flood risk management;
- water quality and water resources;
- waste management;
- land contamination and soil;

### **Flood Risk Management**

The application site lies within Flood Zone 1, 2 and 3 defined by the Environment Agency Flood Map as having a low, medium and high probability of flooding.

The Scoping Report seems to cover the issue of flood risk and acknowledges that a Flood Risk Assessment (FRA) is required.

The scoping report states that *"the development has been designed in order to take account of the flood zone along the adjacent brook particularly with respect to the route of the proposed haul road. Consequently, the site is located within flood zone 1,"* However, the red line boundary indicates that the site is within flood zones 1, 2 and 3. This should be shown in further detail (i.e. through plans at the lower scale) to demonstrate that the red line boundary is out of the floodplain. Please be informed that it may be the case that the red line boundary shows that the site is within the floodplain, however, all development is out of the floodplain. This should be clarified in detail within the FRA.

To assist in the completion of the Environmental Statement and FRA we would advise that:

1. Based on the information provided, we can confirm that the site is greater than 1.0 ha and lies within Flood Zones 1, 2 and 3.
2. Paragraph 101 of the National Planning Policy Framework (NPPF) requires decision-makers to steer new development to areas at the lowest probability of flooding by applying a 'Sequential Test'. Any application will therefore need to be accompanied by a completed Sequential Test that demonstrates that there are no reasonably available alternative sites in areas with a lower probability of flooding that would be appropriate for the type of development proposed. Further guidance is available from: <http://www.environment-agency.gov.uk/research/planning/82587.aspx>. Please note that the Environment Agency only advises on the process of the Sequential Test and does not comment on comparative assessment of land, its availability or suitability for a particular form of development.
3. NPPF Paragraph 103 requires applicants for planning permission to submit a Flood Risk Assessment (FRA) when development is greater than one hectare and located in Flood Zones 1, 2 and 3 defined by Technical Guidance to the NPPF as having a low, medium and high probability of flooding. Accordingly, any planning application must be supported by a FRA, which considers and quantifies the different types of flooding as well as addressing the surface water drainage for the development.
4. The FRA must consider and quantify the different types of flooding to demonstrate that flood risk is not increased by the proposed development and where possible, reduced. Furthermore, the FRA must consider the vulnerability of those that could occupy and use the development, taking account of the sequential and exception tests and the vulnerability classifications (see the Technical Guide to the NPPF), including arrangements for safe access and egress. In addition, it needs to consider the residual risk of flooding and demonstrate whether the building and its users are safe for the lifetime of the development. The FRA should fully detail the areas to be worked, including any planned phasing of extraction and the details of all ancillary features such as bunds, access roads, stockpiling areas and offices as well as the final restoration proposals.
5. There should be no loss of floodplain as a result of the development (during operation and restoration) and the FRA should provide further details on any raising or lowering of land within the floodplain. Any loss of floodplain should be compensated for on a level for level basis (i.e. re-grade the land at the same level as that taken up by the development) therefore providing a direct replacement for the lost storage volume. Within the FRA, detailed information must be provided to demonstrate how this can be achieved.
6. A detailed topographic plans for the existing situation, during operation and for the restoration should be provided, together with a detailed summary of any alterations in the flow direction of surface water run-off / overland flow. Please note that flow paths should not increase flood risk to the surrounding area and third parties.
7. Surface water run-off issues are a key factor for consideration. Any FRA

must demonstrate that surface water run-off can be managed for both, construction and restoration and that the proposed surface water drainage system can cope with 1 in 100 probability plus climate change rainfall event without increasing flood risk to the site, surrounding area and third parties.

8. The FRA must also demonstrate that construction, operation and post development run-off does not exceed pre-development run-off. Within the FRA, surface water run-off rates for the existing, site in operation and post-development site for the 1 in 1 probability rainfall event, the 1 in 30 probability rainfall event and the 1 in 100 probability rainfall event and the attenuation volumes required including an allowance for climate change should be stated. In addition, any FRA must confirm whether the site run-off will be restricted to the Qbar rate for all events or the Q1 for the 1 in 1 probability rainfall event, Q30 for the 1 in 30 probability rainfall event and Q100 for the 1 in 100 probability rainfall event using a complex control.
9. Any attenuation required should be provided in line with the requirements of the SFRA and Preliminary Rainfall Runoff Management for New Development Revision D. The drainage scheme proposed should provide a sustainable drainage strategy to include SuDS elements with attenuation. The maintenance and/or adoption proposals for every element of the surface water drainage system proposed on the site should be considered for the lifetime of the development and the residual risk of flooding addressed.

The FRA should also consider the possibility that the surface water system may fail / become blocked. Overland floodwater flood water should be routed away from vulnerable areas. For acceptable depths and rates of flow, please refer to FD2320/TR2 'Flood Risk Assessment Guidance for New Development Phase 2'. Further consideration should be given to safe access and egress for emergency services when site is flooded.

#### Non Main River Flood Defence Consent:

Any works which may affect the flow of water or culverting of a non-main watercourse requires consent from the Lead Local Flood Authority which in this instance is the Bedford Group of Internal Drainage Boards who will be consenting on behalf of Northamptonshire County Council. It is best to discuss proposals for any works with them at an early stage and any pre-application consent enquiry or consent applications should be directed to the Bedford Group of IDBs using the following details, marking any correspondence **Section 23 Consent for**

#### **Northamptonshire:**

**Post:** Bedford Group of Internal Drainage Boards, Cambridge House, Cambridge Road, Bedford, MK42 0LH

**Email:** [contact@idbs.org.uk](mailto:contact@idbs.org.uk)

**Telephone:** 01234 354396

**Fax:** 01234 328196

**Website:** <http://www.idbs.org.uk/>

#### **Water quality and water resources**

As part of the EIA and application the Applicant may want to consider that any discharges from any washings arising from quarry operations are likely to require some form of treatment as well an environmental permit for the discharge to surface or ground water.

## **Waste management**

The Applicant may want to consider that the extractive materials management statement should be produced by the company to verify whether or not they will be dealing with extractive waste. If so, they will require a mining waste permit under the Environmental Permitting Regulations (implemented through the Mining Waste Directive). Further information on this can be found at <http://www.environment-agency.gov.uk/business/sectors/116550.aspx>.

If the company intends to back fill any areas of the quarry with waste material then they may require authorisation under the Environmental Permitting Regulations.

## **Land contamination and soil**

The Scoping document acknowledges the need for a hydrogeological and hydrological assessments. We can confirm that these documents will be required for this site as the groundwater may be quite shallow and directly connected to surface water features.

The Environment Agency has produced a series of guidance notes which aim to promote a good practice approach to scoping as part of the Environmental Impact Assessment (EIA) process which in some respects goes beyond the statutory EIA requirements. When scoping a project, developers, or their consultants, should satisfy themselves that they have addressed all the potential impacts and the concerns of all organisations and individuals with an interest in the project. The guidelines and handbook can be found on our EA Publications Catalogue by typing EIA into the key search section.

*The comments we set out above are without prejudice to future decisions we make regarding any applications subsequently made to us for our permits or consents for operations at the site.*

Should you require any additional information, or wish to discuss these matters further, please do not hesitate to contact me on the number below.

Yours faithfully

**Francesca Guglielmi**  
**Planning Liaison Officer**

Direct dial 01536 385227

Direct fax 01536 411354

Direct e-mail [francesca.guglielmi@environment-agency.gov.uk](mailto:francesca.guglielmi@environment-agency.gov.uk)



Awarded to the Environment, Planning & Engagement  
Department, Anglian Region, Northern Area



East  
Northamptonshire  
Council

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[www.east-northamptonshire.gov.uk](http://www.east-northamptonshire.gov.uk)

The Director of Planning and Transportation  
Northamptonshire County Council  
P O Box 163  
County Hall  
Northampton  
NN1 1AX

For the attention of Mr Phil Watson

<b>Please ask for</b>	<b>Direct Dial</b>	<b>Our Reference</b>	<b>Your Reference</b>	<b>Date</b>
Amie Baxter Planning Services	01832 742226	12/01181/NCC		6 August 2012

Dear Sir/Madam

## **TOWN AND COUNTRY PLANNING ACT 1990**

**Proposal :** Consultation on Scoping request to extract Blisworth limestone, blockstone, flagstone and large walling stone at Stone Pits Quarry at SP9788 OP9078 Oundle Road Upper Benefield Northamptonshire .

Thank you for your consultation on the above matter which was received on 20 July 2012 and was allocated the reference: **12/01181/NCC**.

I would advise you that this authority has no objection to the proposals in principle **subject to the following comments:**

1. That NCC be advised that East Northamptonshire Council have no objection to the approach taken in the submitted scoping request, subject to the following issues being included as part of the Environmental Impact Assessment:
  - An appropriate assessment with regards to the potential for harm in terms of dust, in accordance with advice given in the NPPF.
  - An appropriate noise assessment, in accordance with advice given in the NPPF.
  - An appropriate assessment with regards to the impact of the development on neighbouring private water supplies, in accordance with advice given in the NPPF.
  - An appropriate landscaping assessment with commitment given towards providing planting or other sympathetic screening.
  - An appropriate traffic assessment with acknowledgement that a routing agreement is likely to be set to prevent the use of local village roads for HGV movement associated with the development.

I trust that the above observations (if any) can be taken into consideration during the determination of the application but should further information be required regarding this matter please contact direct the Case Officer, on Direct Line 742226.

Yours faithfully

A handwritten signature in black ink, appearing to read 'Rob Back', written in a cursive style.

Rob Back  
Head of Planning Services  
dcpecraz



Cedar Drive Thrapston Northamptonshire NN14 4LZ  
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Claire Spokes  
Planning Services  
Floor 3  
Guildhall Road Block  
County Hall  
Northampton  
NN1 1DN



Please ask for	Direct Dial	Our Ref.	Your Ref.	Date:
Caroline Ellis	01832 742161		12/00003/SCO	23 July 2012

Dear Ms Spokes

**TOWN AND COUNTRY PLANNING (ENVIRONMENTAL IMPACT ASSESSMENT)  
REGULATIONS 2011 SCOPING REQUEST CONSULTATION - REGULATION 13**

**PROPOSED DEVELOPMENT: Conservation stone quarry to extract Blisworth  
limestone blockstone, flagstone and large walling stone  
LOCATION: Stone Pits Quarry, Benefield, Oundle, Northamptonshire, PE8 5AN**

R P Planning Ltd has formally requested a Scoping Opinion to determine the type and extent of information required for inclusion within an Environmental Statement to accompany a planning application for the above proposal.

I have read through the environmental statement document and have no comments to make at this time in respect to air quality and dust control from the site. Obviously the Dust Assessment mentioned in the document would need to be submitted as part of the planning application. This document would need to include information about dust generation, any receptors and suitable mitigation measures that will be taken.

If you need to contact me I am in the office all day on Mondays, all day on Tuesdays and Wednesday mornings. If I am not in the office please leave a message and I will contact you on my return. Alternatively contact another member of the Environmental Protection team.

Yours sincerely

Caroline Ellis  
Environmental Protection Officer



East  
Northamptonshire  
Council

Cedar Drive Thrapston Northamptonshire NN14 4LZ  
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Northamptonshire County Council - Claire Spokes  
Planning Service  
Floor 3  
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NORTHAMPTONSHIRE  
COUNTY COUNCIL  
26 JUL 2012  
CS  
GROWTH MANAGEMENT

Please ask for	Direct Dial	Our Reference	Your Reference	Date
Amie Baxter Planning Services	01832 742226	12/01181/NCC		25 July 2012

Dear Sir/Madam

#### TOWN AND COUNTRY PLANNING ACT 1990

**Proposal :** Consultation on Scoping request to extract Blisworth limestone, blockstone, flagstone and large walling stone at Stone Pits Quarry at SP9788 OP9078 Oundle Road Upper Benefield Northamptonshire .

Thank you for your consultation on the above matter which was received on 20 July 2012 and has been allocated the Reference No. **12/01181/NCC**.

I will endeavour to let you have this Council's response within the allocated time period but should , however, further information be required please make direct contact with the Case Officer, Amie Baxter on Direct Line No. 742226.

Please quote the above Reference No. in any communication with this office about this matter.

Yours faithfully

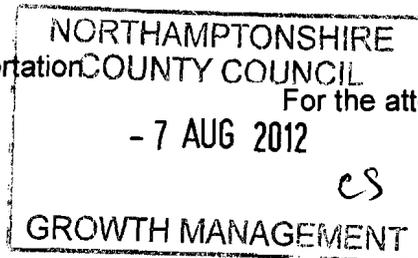
Rob Back  
Head of Planning Services  
dcackcon



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The Director of Planning and Transportation  
Northamptonshire County Council  
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For the attention of Mr Phil Watson

Please ask for	Direct Dial	Our Reference	Your Reference	Date
Amie Baxter Planning Services	01832 742226	12/01181/NCC		6 August 2012

Dear Sir/Madam

## TOWN AND COUNTRY PLANNING ACT 1990

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Yours faithfully

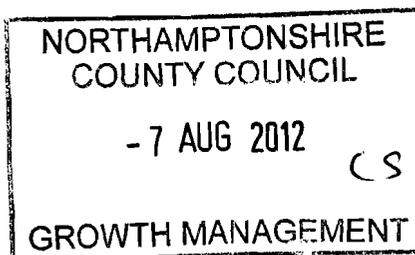
A handwritten signature in black ink, appearing to read 'Rob Back', written in a cursive style.

Rob Back  
Head of Planning Services  
dcpecraz



ENGLISH HERITAGE  
EAST MIDLANDS OFFICE

Mr Nathan Maddox  
GP Planning Ltd  
The Stables  
Long Lane  
East Haddon  
Northampton  
NN6 8DU



Direct Dial: 01223 323452  
Direct Fax: -

Our ref: PA00047768

2 August 2012

Dear Mr Maddox

**Request for Pre-application Advice**

**POTENTIAL CONSERVATION STONE QUARRY, BENEFIELD,  
NORTHAMPTONSHIRE**

Thank you for your letter of 16 July 2012 consulting English Heritage about the above EIA Scoping Report.

This development could, potentially, have an impact upon designated heritage assets and their settings in the area around the site. In line with the advice in the National Planning Policy Framework (NPPF), we would expect the Environmental Statement to contain a thorough assessment of the likely effects which the proposed development might have upon those elements which contribute to the significance of these assets.

Our initial assessment shows the attached list of designated heritage assets within 1 km of the proposed development. We would draw your attention, in particular, to the following:

- Benefield Castle - Scheduled Ancient Monument
- Church of St Mary, Lower Benefield - Grade II\*

The impact upon the Upper Benefield conservation area, which lies to the north of the application site, should also be assessed.

We would also expect the Environmental Statement to consider the potential impacts which the proposals might have upon those heritage assets which are not designated, defined in NPPF as "a building, monument, site, place, area or landscape positively identified as having a degree of significance meriting consideration in planning decisions". These should also be included as heritage assets, designated or



44 DERNGATE, NORTHAMPTON, NN1 1UH

Telephone 01604 735 400 Facsimile 01604 735 401  
[www.english-heritage.org.uk](http://www.english-heritage.org.uk)

*English Heritage is subject to the Freedom of Information Act 2000 (FOIA) and Environmental Information Regulations 2004 (EIR). All Information held by the organisation will be accessible in response to an information request, unless one of the exemptions in the FOIA or EIR applies.*

*English Heritage will use the information provided by you to evaluate any applications you make for statutory or quasi-statutory consent, or for grant or other funding. Information provided by you and any information obtained from other sources will be retained in all cases in hard copy form and/or on computer for administration purposes and future consideration where applicable.*



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EAST MIDLANDS OFFICE

otherwise, as they are valued components of the historic environment. This information is available via the local authority Historic Environment Record ([www.heritagegateway.org.uk](http://www.heritagegateway.org.uk)) and relevant local authority staff.

We would strongly recommend that you involve the Conservation Officer East Northamptonshire and the archaeological staff at Northants HER in the development of this assessment. They are best placed to advise on: local historic environment issues and priorities; how the proposal can be tailored to avoid and minimise potential adverse impacts on the historic environment; the nature and design of any required mitigation measures; and opportunities for securing wider benefits for the future conservation and management of heritage assets.

It is important that the assessment is designed to ensure that all impacts are fully understood. Section drawings and techniques such as photomontages are a useful part of this. We would also recommend you read our guidance entitled, *The Setting of Heritage Assets*, which is available to download from our website.

The assessment should also take account of the potential impact which associated activities (such as construction, servicing and maintenance, and associated traffic) might have upon perceptions, understanding and appreciation of the heritage assets in the area. The assessment should also consider, where appropriate, the likelihood of alterations to drainage patterns that might lead to *in situ* decomposition or destruction of below ground archaeological remains and deposits, and can also lead to subsidence of buildings and monuments.

If you have any queries about any of the above, or would like to discuss anything further, please contact me.

Yours sincerely

**Neville Doe**

Assistant Historic Buildings Advisor

E-mail: [neville.doe@english-heritage.org.uk](mailto:neville.doe@english-heritage.org.uk)

cc Claire Spokes - Northamptonshire County Council



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**POTENTIAL CONSERVATION STONE QUARRY, BENEFIELD,  
NORTHAMPTONSHIRE**  
**Request for Pre-application Advice**

**Information Provided**  
Site location plan

**Published Guidance**  
The Setting of Heritage Assets (English Heritage)



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[www.english-heritage.org.uk](http://www.english-heritage.org.uk)

*English Heritage is subject to the Freedom of Information Act 2000 (FOIA) and Environmental Information Regulations 2004 (EIR). All Information held by the organisation will be accessible in response to an information request, unless one of the exemptions in the FOIA or EIR applies.*

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## Northamptonshire County Council

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### memo

To: Claire Spokes  
From: Lesley-Ann Mather  
Ref: 12/00003/SCO  
Date: 23<sup>rd</sup> August 2012  
cc:

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#### **TOWN AND COUNTRY PLANNING (ENVIRONMENTAL IMPACT ASSESSMENT) REGULATIONS 2011 SCOPING REQUEST CONSULTATION - REGULATION 13**

**PROPOSED DEVELOPMENT: Conservation stone quarry to extract Blisworth limestone blockstone, flagstone and large walling stone**

**LOCATION: Stone Pits Quarry, Benefield, Oundle, Northamptonshire, PE8 5AN**

Claire

Thank you for your consultation regarding the archaeological baseline information required for inclusion within any forthcoming Environmental Statement.

The proposals to undertake further archaeological investigations as discussed within section 5.11 Heritage of the EIA Scoping Consultation will allow for the provision of sufficient information on the archaeological potential of the site. I would however suggest that the applicant or their chosen archaeological representative contacts this office at the earliest opportunity to discuss the scope of the required archaeological fieldwork.

Regards

Lesley-Ann

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t. 01604 367909  
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Northamptonshire  
County Council



## Northamptonshire County Council

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### memo

To: Claire Spokes  
Your Ref: 12/00003/SCO  
From: Terry Chapman  
NCC Ref: PL 4864  
Date: 1<sup>st</sup> August 2012  
cc:

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#### **Proposed Development: Conservation stone quarry at Stone Pits Quarry, Benefield, Oundle Northamptonshire, PE8 5AN.**

Dear Claire.

I refer to your scoping request dated 16<sup>th</sup> July and make the following observations:-

That the site location grid reference 98826 88825 where the submitted speed survey report indicates that the section of highway is within a 30mph restricted speed limit, which would need to be addressed in the first instance to clarify the data received for appraisal..

In the first instance sight lines are to be formed either side of the site access for a distance of some 215.0m set back 4.5m from the channel line. However with the support of a revisited speed survey consideration can be given to reduce this need. I am aware from my site visit and the topography of the carriageway vertical and horizontal alignment vehicle visibility splays of 180.0m can be achieved in a Westerly direction and 120.0m can be achieved in a Easterly direction from drivers emerging from the site onto the A427.

Issues regarding the site access gradients to emerge onto the highway network where a maximum gradient of 1 in 40 shall be created for the first 30.0m from the channel line of the A427.

The area of carriageway either side of the promoted access point would need to be reconstructed to introduce additional heavy traffic in this area.

A routine agreement would need to be introduced to ensure that the vehicles turn left when leaving the site where the A427 Barnwell Road Oundle Bridge has an imposed weight restriction of 3.5 tonnes and the local road within Oundle have a 7.5m tonne weight restriction.

Continued....page 1 of 2.....

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Riverside Way Northampton  
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w. [www.northamptonshire.gov.uk](http://www.northamptonshire.gov.uk)  
t. 01604 654331  
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e. [tchapman@nothamptonshire.gov.uk](mailto:tchapman@nothamptonshire.gov.uk)



Northamptonshire  
County Council

Continued....page 2 of 2.....

Therefore the only route available to connect to the A605 would be via Weldon A427 onto the A43 and utilising the A6116 and A14 to link to the A605 at Thrapston to allow drivers to travel towards Peterborough.

A routine agreement, with appropriate road signs being erected within the curtilage of the site, to ensure that all drivers emerging from Stone Pit Quarry turn left onto the A427 to access the strategic County highway network. It will also be necessary to ensure that the minor route through to Brigstock from lower Benefield should not be used, where reduced widths and tight junctions would not be an alternative route to access the A6116..

A daily timed log shall be kept on an ongoing basis to record all vehicles attracted to the site and this log shall be maintained on an annual basis and be available for scrutiny at the request of the County Planning Authority.

All operational vehicles arriving at and leaving the site shall be appropriately sealed so as to prevent material spillage, wind blow and dust nuisance.

All operational vehicles leaving the site shall be cleansed of mud and all other debris to ensure that no material is deposited on the adopted highway, maintainable at public expense.

Regarding the safe passage of pedestrian movement where the haul road will be created with the site bounded by the Red line noting that existing Public Rights of Way MG17, MG18 and MG27 are affected by the promoted development and trust that signing and measures are promoted to facilitate this need to maintain and protect the Rights of Way.

The advice is given without prejudice to the views which may be expressed by Northamptonshire County Council as Highway Authority, should an application be made.

Signed.....*J Chapman*.....

for Head of Transport, Highways and Infrastructure  
Northamptonshire County Council.

## Emma White

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**From:** Mark Chant  
**Sent:** 04 September 2012 10:10  
**To:** Claire Spokes  
**Cc:** Laura Jones  
**Subject:** Benefield Building Stone Extraction Proposal

Claire

In developing an application here the applicant/agent will have to give a full explanation of how, as a non-allocated site, the proposal complies with Policy CMD4, particularly the third and fifth criteria and the final paragraph.

regards

Mark.

[Mark Chant](#) | [Head of Planning Services](#) | [01604 366831](#) | [Planning Services, Northamptonshire County Council, County Hall, Guildhall Road, Northampton NN1 1DN](#)



## Northamptonshire County Council

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### memo

To: Claire Spokes  
From: Tina Cuss  
Ref: 12/00003/SCO  
Date: 9 August 2012  
cc: Phil Watson, Mark Laurenson

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#### **TOWN AND COUNTRY PLANNING (ENVIRONMENTAL IMPACT ASSESSMENT) REGULATIONS 2011 SCOPING REQUEST CONSULTATION - REGULATION 13**

**PROPOSED DEVELOPMENT: Conservation stone quarry to extract Blisworth limestone blockstone, flagstone and large walling stone**  
**LOCATION: Stone Pits Quarry, Benefield, Oundle, Northamptonshire, PE8 5AN**

In order that interrelationship between aspects of the environment that will be affected by the development are considered, I would recommend that Ecology is not scoped out of the Environmental Statement. I have a small number of additional comments to make on the details of the assessment that should be provided with the Planning Application.

The landscape visual impact assessment for the development proposal should be undertaken using the most up-to-date published guidelines available at the time that the Planning Application is prepared. The 'Advice note on photography and photomontage in landscape and visual impact assessment' published in 2011 as an appendix to the GLVIA 2<sup>nd</sup> edition by the Landscape Institute. Consultation on the third draft edition of the Guidelines for Landscape and Visual Impact Assessment has been undertaken in 2012.

The ecological assessment that is submitted in support of the planning application should include an assessment of impacts on Habitats and Species of Principal Importance as well as designated sites and protected species. Proposals to provide enhancements for landscape and ecology as well as mitigation schemes should be include with the submissions.

I am happy to provide advice on any proposed mitigation scheme and landscaping prior to submission of the application.

Tina Cuss  
Senior Environmental Planner

Planning Services  
Guildhall Road Block  
County Hall  
Northampton  
NN1 1DN

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Northamptonshire  
County Council



Bedfordshire  
Cambridgeshire  
Northamptonshire

Protecting wildlife close to home

The Wildlife Trust  
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Ms Claire Spokes, Case Officer  
Planning Services, Floor 3  
Northamptonshire County Council  
Guildhall Road Block  
County Hall  
Northampton  
NN1 1DN

Sent via Email.

6<sup>th</sup> August 2012

Dear Ms Spokes

**RE: Application No. 12/00003/SCO; Scoping Opinion Request; Conservation stone quarry to extract Blisworth limestone blockstone, flagstone and large walling stone; at Stone Pits Quarry, Benefield, near Oundle.**

**COMMENT.**

Thank you very much indeed for consulting The Wildlife Trust in respect of the above Scoping Opinion Request for a proposed new stone quarry between the settlements of Upper and Lower Benefield to the west of Oundle.

We refer now to your Consultation Covering Letter, dated 16<sup>th</sup> July 2012, about this same matter, as received via email, and also to the associated documentation which accompanies it, as listed on your Authority's own website.

The Wildlife Trust is also of the opinion that, for a project of this scale and nature, an Environmental Impact Assessment would indeed be required. You may also wish to consider a Sustainability Appraisal too.

However, contrary to what the Applicant is currently proposing to do, The Wildlife Trust's view is that the topic of Ecology must be scoped-in to the EIA being prepared here.

New developments, as stated in National, Regional and Local planning policy, should both protect and enhance local biodiversity as an integral part of any proposal. Alongside an assessment of the existing ecological value of the site, we would like to see the identification of opportunities for such enhancement.

**Ecological surveys and information.**

Adequate baseline surveys should be completed to assess the value of the proposed development site and its surrounding areas. The Wildlife Trust recommends that at least an Extended Phase 1 Habitat Survey be carried out, and that all Statutory and Non-Statutory sites, protected species and other relevant species and



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habitats be fully investigated and evaluated. Information on wildlife records for the area should be obtained as part of this from the Northamptonshire Biodiversity Records Centre ( NBRC ); contact details below. A list of additional local contacts for Northamptonshire is also enclosed below.

For information, with reference to Drawing No. GPP/CSL/BE/12/02, Rev. No. 3, dated 7<sup>th</sup> February 2012, entitled “Site Plan”, as contained within GP Planning Ltd’s “EIA Scoping Report” documentation, the proposed footprint for this stone extraction site and haul road has the following features :

- There are several instances of existing site designations, of varying categories, lying inside an overall assumed zone of approximately 2 kilometres around it. These are Sites of Special Scientific Interest ( SSSI ), Local Wildlife Sites ( LWS ), Potential Wildlife Sites ( PWS ), and Protected Wildflower Verges ( PWV ).
- Within this same, assumed, 2km radius Zone of Interest, there are also several areas of Ancient Woodland habitats too.
- The Wildlife Trust is aware of a good number of historical records of sightings of ‘protected species matters’ within a distance of 2 kilometres away from the outline boundary of this proposed development area.

In addition, consideration may well need to be given to the issue of whether or not there is going to be any significant degree of increased artificial lighting levels occurring as a result of the delivery of this proposed development scheme, and if so, the ways in which it might have an impact upon the local biodiversity – such as bat species, for example.

### **Enhancement of biodiversity and Green Infrastructure.**

Opportunities for the enhancement of biodiversity include linking and buffering existing wildlife sites and habitats through habitat creation and incorporation of Green Infrastructure ( GI ). Reinforcement of this is found in the East Midlands Regional Plan, the NPPF, NERC Act ( 2006 ) and Local Development Plans. The EIA should include proposals for ecological mitigation linked to the during- and post-construction impacts and should suggest the content of Planning Conditions and ecological sections of S106 Agreements if applicable.

Northamptonshire’s Local Biodiversity Action Plan gives details and targets on locally important species and habitats ( [www.northamptonshirebiodiversity.org](http://www.northamptonshirebiodiversity.org) ).

In addition, we would draw the Applicant’s attention to the recently-produced “Biodiversity SPD” document which has been ratified by the North Northamptonshire Joint Planning Unit, and by other Authorities too.

We strongly recommend that a GI approach be followed. This process should be incorporated as an integral part of the EIA analysis. The key ecological aspect of GI that we would expect to see is the linking of existing and / or potential wildlife habitat within the site and connections out of the site to create more sustainable ecosystems.

The construction of such a development scheme in this location has the potential to contribute towards the opportunities for re-connecting habitats areas in the swathe of countryside in this part of East Northants



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District in the future. Increasing connectivity of habitats should be a top priority for all areas of the county in order to provide for both sustainable and robust areas of the countryside under suitable ecological management and for a joined-up 'Living Landscape' that will allow species and habitats to better adapt to the effects of climate change.

The Wildlife Trust is of the view that, in line with the policy and guidance given within national and regional policy ( East Midlands Regional Plan – Policy 1, 28, 29 ) documents, mitigation measures to address any potential negative impacts upon established biodiversity assets must be brought forward, and Conditioned as necessary.

The emerging development proposals here should look at the possibilities for delivering both county Biodiversity Action Plan target objectives ( see [www.northamptonshirebiodiversity.org](http://www.northamptonshirebiodiversity.org) ) and the provision of a Green Infrastructure network contribution, as already discussed above. The project should indeed be aiming to deliver a nett biodiversity gain for the local area as a result of its delivery on-the-ground.

Landscaping and ecological mitigation are only of worth to wildlife if properly managed. Therefore, the EIA should consider the long-term management of all green spaces.

In our opinion, it is important to not introduce any non-native or invasive species into either terrestrial or aquatic environments. Therefore, any soft landscaping elements that it is intended to include within this development proposal should be provided for by the use of native species ( of plants, shrubs and trees ) only. Ideally, these species should be chosen as ones that are typical of that part of the county and they should all only be sourced from a local and a known provenance. These areas should be managed for the benefit of wildlife.

### **Analysis of cumulative effects.**

The Wildlife Trust recommends that, in addition to addressing any potential direct / indirect impacts as a sole result of their own development scheme, the Applicant also be required to include, in the appropriate section(s) of the supporting documentation, a comprehensive review of just what the likely effects of the provision of their facilities is going to be upon the existing biodiversity at this location in combination with all of the other relevant encroaching development pressures in this area of the District.

### **Feedback in respect of Applicant's Scoping Report document.**

With reference to the "EIA Scoping Report" document, dated July 2012 ( Version 1; Final ), from GP Planning Ltd., please note our specific points of observation, as follows :

- As you will be aware, The Wildlife Trust has found this particular document to be incomplete, confusing and misleading from the very beginning.
- In Paragraph 2.1.7 on Page 2, the site area referred to as "Spring Wood" has not been identified as being a SSSI. Spring Wood is one area of three separate woodland blocks which comprise a single / overall SSSI designated area.



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- Indeed, for the content / information given in Paragraphs 2.1.7 to 2.1.9 inclusive on Page 2, please be aware that the details given about the various types of relevant designated site are incorrect and incomplete.
- With reference to the final sentence of Paragraph 3.1.13, on Page 5 of this document, The Wildlife Trust is strongly of the view that the proposed “...*end use of the restored site will be agricultural*” is under-shooting the potential that is offered by this particular location. Since this is a quarry site principally for the extraction of limestone, The Wildlife Trust therefore believes that this location and this type of activity may well offer an excellent opportunity for the delivery of the creation and future management of areas of Calcareous Grassland – which is a Northants county BAP Priority Habitat target type.
- This document seems to contain an apparent contradiction in its intentions between what it says within Paragraph 5.1.1, on Page 9, where it states that Ecology is a topic that will actually be included in the EIA, and thus in the Environmental Statement paperwork itself, and what it says at Section 5.18, on Page 21, where it lists Ecology as one of the topics that are to be scoped-out of the EIA.
- Within Appendix 5, this report only contains the ‘output’ of the Extended Phase 1 Habitat Survey effort that is said to have been undertaken at this location; that is, only the Phase 1 Habitat Plan drawing itself. There has been no inclusion of the ‘raw data’ or ‘source material’ of the detailed content of the actual Extended Phase 1 Habitat Survey report itself.
- Similarly, the same Appendix 5 also contains a Tree Constraints Plan drawing without providing for review and assessment the associated underpinning content of the detailed arboricultural survey exercise itself.

Furthermore, again given both the nature of this proposed development scheme and its location, it is our view that this forthcoming Application for a new quarry must be required to produce an appropriate Ecological / Geological Management Plan document in association with it which will provide for the detailed management prescriptions and monitoring programme needs that must be applied to this site and its environs. Perhaps this objective might best be achieved through the use of relevant Planning Conditions and / or the insertion of suitable clauses into a S106 Agreement, if appropriate.

### **Other comments.**

As you will be aware, since the date that your initial consultation contact was received by us, 16<sup>th</sup> July 2012, until the date of this same piece of correspondence here, 6<sup>th</sup> August 2012, The Wildlife Trust has made repeated efforts and requests to be given the opportunity to see for review and comment the several items of relevant background material in an ecological / biodiversity sense that we believe are necessary in order to be able to make a fully-informed evaluation of, and decision about, this particular current Scoping Request.

At the time of writing, this ‘missing’ information is apparently still not available from the Applicant’s team of advisers.



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During this exchange of requests for additional supporting information, The Wildlife Trust was sent an extract, Pages 18 to 22, Sections 4.2 to 4.4 inclusive ( assumed ), from a Draft document entitled "Ecological Baseline & Impact Assessment", dated April 2012, apparently prepared by the consultancy Lockhart Garratt Ltd.

A limited appraisal of this fragment of the larger report, as far as it goes, would seem to indicated that Lockhart Garratt had obviously identified the presence / location of some trees with the potential to host bat roosts, a nearby main sett for badgers, and also badger foraging activity on the Application Site itself, and brown hares and breeding skylarks too.

That same Draft document included, in the final section of the extract provided, a recognition that mitigation measures would need to be provided for all of these identified protected species / BAP priority species matters.

However, how can an appropriate / adequate mitigation package be produced if there has not been proper survey effort carried out first in order to understand exactly what the situation is on-the-ground that we are all dealing with in respect of each of these individual species issues.

### **Summary.**

Since, in ecological terms, as set-out here above, The Wildlife Trust has identified that there are several shortcomings in the overall content of the range of materials that have been submitted thus far in support of this particular Scoping Request, we are therefore clearly of the view, as a consequence, that the topic of Ecology must in fact be firmly scoped-in to the EIA process relating to this proposed new quarry site for the extraction of stone.

The Wildlife Trust would welcome an early opportunity to review any ecological appraisal work already being carried out by consultants in respect of this same project.

We hope that the above comments are useful to you. We look forward to reviewing the relevant sections of any Environmental Impact Assessment statement that might be submitted. Please do not hesitate to contact The Wildlife Trust again if you have any questions about the above points.

We look forward to reviewing the relevant sections of any Environmental Statement that might eventually be submitted.

Please do not hesitate to contact The Wildlife Trust again if you have any questions about the above points.



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Yours sincerely,



**Alan J.G. Smith**

Planning & Biodiversity Officer – Northamptonshire.

Email : [alan.smith@wildlifebcn.org](mailto:alan.smith@wildlifebcn.org)

**The Northamptonshire Biodiversity Records Centre (NBRC);**

- Lings House, Billing Lings, Northampton, NN3 8BE;  
Tel: 01604 400448; Email: [nbrc@wildlifebcnp.org](mailto:nbrc@wildlifebcnp.org).

**Other potential local consultees**

- The Northamptonshire bat group (Phil Richardson, [prichabat@aol.com](mailto:prichabat@aol.com))
- The North Northamptonshire Badger group (Wellingborough, Kettering, Corby, East Northants) (Peter Edwards, [settreorder@northnorthantsbadgers.co.uk](mailto:settreorder@northnorthantsbadgers.co.uk))
- The West Northamptonshire Badger Group (Northampton, Daventry, South Northants) (Steven Jackson, [Steve@badgers.org.uk](mailto:Steve@badgers.org.uk))
- The Northamptonshire Barn Owl Group (Paddy Jackson, [paddy@paddyjackson.co.uk](mailto:paddy@paddyjackson.co.uk))
- The Hawk and Owl Trust (<http://www.hawkandowl.org/>)
- The British Trust for Ornithology (BTO, <http://www.bto.org/index.htm>)
- The RSPB (Colin Wilkinson, [colin.wilkinson@rspb.org.uk](mailto:colin.wilkinson@rspb.org.uk))
- Northamptonshire Moth Recorder (John Ward, [bjward@btinternet.com](mailto:bjward@btinternet.com))



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