



Scoping Opinion

The Town and Country Planning (Environmental Impact Assessment) Regulations 2017

Application Reference Number: PL/2025/04038

Received Date: 29 April 2025

Decision Date: 11th July 2025

Applicant:	Raymond Brown Quarry Products Ltd Second Floor, Fryern House, 125 Winchester Road, Chandler's Ford, Hampshire, S053 2DR
Particulars of Development:	Scoping Opinion for proposed 'Sandland' extension (Phase 9) to Brickworth Quarry
Site Address:	Brickworth Quarry, Whiteparish, Wiltshire, SP5 2QG

Dear Mr Robert Storey,

I write in response to your recent submission of a request for a scoping opinion and I have assessed the information that should be provided, and that needs to be within, the scope of an EIA for the above proposal. I have taken into account the information given in your EIA Scoping request document.

The proposal is for the development of 'Sandland' extension, to the north of the existing Brickworth Quarry, accessed from a purpose-built junction of the A36 Brickworth Road, Salisbury. The site is an unallocated area of land within the Wiltshire Core strategy as adopted in 2015.

The proposed development is considered to be a Schedule 2 Development under the above regulations; as a quarry exceeding 125,000 tons extraction per year. I have taken account of the information supplied in your scoping report of April 2025 in reaching this conclusion.

The location of the development

The location of the development is within the River Avon Special area of conservation and is also situated adjacent and close to the Porton Down SSSI and SAC and in a special landscape area as designated by the former Salisbury District local plan. It is not however situated in an area at high risk of flooding (flood Zones 2 and 3) or located

in a conservation area or particularly close to a listed building (although there are listed buildings further away)

The location of the land is in an area susceptible to ground water flooding. It is additionally an area of groundwater vulnerability. The land is classified as Grade 3 Agricultural land and is located in the New Forest and Salisbury Plain and West Wiltshire Downs Countryside character areas. Additionally, the saved policies of the Salisbury District Local Plan designate this as a Special landscape area. The A36 trunk road runs east to west along the north-eastern boundary of the site. Public footpaths WHIT12 runs on the western boundary of the site. The site does not have a specific ecological designation.

The rest of this letter goes on to consider the potential impacts from this development and the scope of the EIA which will be needed to address those impacts. I have used the headings within the submitted scoping report for ease of reference to set out what the local planning authority would expect to see in a future EIA as submitted with a planning application for the development.

Types and characteristics of the potential impact of this project are various, and amongst those most notable impacts will be pollution (air and noise), traffic, visual impact, impact on ecology and archaeology (potentially).

Landscape and Visual

The visual aspect to the operations that are proposed to be carried out are perhaps one of two most important aspects to this application. The site may be viewed from a number of different public vantage points including the public footpath WHIT12. The main A36 trunk road (see highways impacts below) and from the nearby Brickworth Road. The impact that the quarry extension is likely to have on all of these receptors needs to be assessed and any avoidance or mitigation measures such as additional planting required to screen the quarry from public views will need to be considered. The comments received from the council's Landscape Officer notes that a detailed Landscape and Visual impact assessment is proposed, and this is considered appropriate to assess the landscape and visual impact of this proposal.

Air Quality

The Public Protection Officer has noted that RBQP are to submit an Air Quality assessment to cover dust emissions and that they agree that this should be included in the EIA. They have pointed to their own technical guidance which can be found at <https://www.wiltshire.gov.uk/env-protection-developer-advice> and that advice should be followed in any EIA produced. Please see Appendix E for Public Protection response. The dust assessment study should accord with Planning Practice Guidance for Minerals regarding how mineral operators should seek to minimise dust emissions. Measures to control dust and proposals to monitor and report should be set out a dust management plan.

Noise

Also, the Public Protection Officer has stated that they note that RBQP are to submit

a Noise Impact Assessment to cover noise as part of the EIA and that they agree that this should be included in the EIA. They have pointed to their own technical guidance which can be found at <https://www.wiltshire.gov.uk/env-protection-developer-advice> and that advice should be followed in any EIA produced. Please see Appendix E for Public Protection response. The noise impact assessment study should accord with Planning Practice Guidance for Minerals regarding how mineral operators should seek to control noise emissions and what are appropriate noise standards. Measures for the control or mitigation of noise emissions should be set out in a noise management plan.

Drainage and Flooding

The council's Drainage Officer has commented as both the Lead Local Flood Authority and in view of the sites designation as an area susceptible to ground water flooding and ground water vulnerability. He considers the inclusion of a full flood risk assessment along with a drainage strategy and construction management plan to be an acceptable and proportionate amount of information to be submitted in this case.

With regard to flooding it is noted that a site specific flood risk assessment is to be submitted and this is considered to be sufficient to cover flooding issues. A detailed response as to precisely what the EA (and the council) would wish to see in the FRA is included at appendix B to this scoping opinion.

Highways

The two highways most effected by the proposal come under the jurisdiction of two different authorities with the main A36 Trunk Road being managed by National Highways and the more local A27 Brickworth road that serves Whiteparish and beyond is managed by this councils own local Highways department. An extensive response has been received from National Highways and that is included in full at the end of this letter as Appendix A, but in summary National Highways consider that a full transport assessment should be carried out to consider the effects on the main A36 from the traffic produced by the quarry.

A response has similarly been received from the council's highways officer, who has agreed that transport matters can be scoped out of the EIA. However, as National Highways require a transport statement to inform any planning application, for this proposal, it is suggested that this will be needed to accompany the application in assessing the impact of the number of vehicles both entering and leaving the site and their impact on the wider area including the New Forest.

Archaeology

It is considered that archaeology should be scoped into any Environmental Impact Assessment for this scheme so that the archaeological implications of the proposed quarry extension are fully understood at the outset. Archaeological assessment should comprise desk-based research, geophysical survey and exploratory archaeological investigation through trial trenching.

The council's archaeologist has stated - "This assessment will establish the presence,

character, and significance of buried remains that will be impacted by the proposed quarry extension and enable appropriate mitigation measures to be determined, which might include the removal of highly significant buried remains from the area of proposed quarrying, archaeological investigation prior to the commencement of quarry operations, or archaeological monitoring and recording during the early stages of quarry operations. Until appropriate archaeological assessment has taken place, the mitigation proposed by the applicant of an archaeological watching brief during mineral extraction cannot be considered as adequate or sufficient.”

The EIA should include therefore an archaeological evaluation.

Ecology

Although no comments have received from the ecology officer, however, the council has received an extensive response to its consultation from Natural England, and this is replicated in full at Appendix D of this letter. Having considered the information submitted with the scoping request and the Preliminary Ecological Assessment, it is considered that ecology should be scoped into any Environmental Impact Assessment for this scheme, so that the ecological implications of the proposed quarry extension are fully understood prior to development. The ecological assessment should include impacts and effects of the development within the following: General Principles; Cumulative and In-Combination Effects; Environmental Data; Biodiversity and Geodiversity; Designated Nature Conservation Sites; and Protected Species. A Biodiversity Net Gain Metric and shadow HRA would also be appropriate to submit with any future planning application. The other recommendations made by Natural England in Appendix D should also be taken into account in this required assessment.

The EIA should include therefore an ecological evaluation.

Arboriculture

We note the proposal to scope out of the EIA any arboricultural impacts and would concur that given the impacts will be relatively limited these can be scoped out of the EIA. Any future planning application will none the less need to consider these impacts and any mitigation necessary.

Cultural Heritage (conservation)

As mentioned in the introduction to this letter the site is not positioned in a conservation area (the nearest conservation area being Whiteparish to the East). or other heritage designation. The nearest listed buildings are some distance away and are at Brickworth Quarry and Newton. These heritage assets can be scoped out of any EIA submitted, although they will need to be considered as part of the planning application.

Climate Change/Sustainability

The intention to consider climate change and sustainability matters within each chapter of the EIA and as a whole in the application is noted and is considered a suitable method for assessing climate change as part of any future planning application.

Cumulative impacts

The Cumulative impacts of both this and the neighbouring quarry sites will need to be considered, along with any other proposals of scale that combined, may have an impact on the surrounding area. Clearly this may include proposals in other local authority areas that we are unaware of. Two schemes locally that you may wish to consider are the recently granted development for 25 dwellings at Whiteparish (our ref PL/2022/09532) and slightly further afield a proposal for 30 dwellings in Alderbury, (our ref PL/2022/03103). There will undoubtedly be others, but these are two development schemes that we would wish to see included in any consideration.

Economic impacts

The council is keen to support business that provides significant economic benefits. The economic impacts of this proposal in both providing continued employment for existing workers on the site and a ready source of sand to be used in the building trade both locally and beyond as well as providing an area for the disposal of inert waste locally to the building trade is an important consideration. The council considers that the EIA in considering all the potential impacts of this development should include a section setting out what the economic impacts of the development.

Consideration of alternative sites

As noted in Planning Practice Guidance, the 2017 EIA Regulations do not require an applicant to consider alternatives. However, where alternatives have been considered, paragraph 2 of Schedule 4 requires the applicant to include in their Environmental Statement a description of the reasonable alternatives studied (for example in terms of development design, technology, location, size and scale) and an indication of the main reasons for selecting the chosen option, including a comparison of the environmental effects.

Conclusion

In general, the approach proposed in the scoping report is considered acceptable when combined with the comments made by individual consultees as above and as outlined in the appendices' attached.

I hope that this letter is sufficient for your purposes, but should you require anything further please do not hesitate to contact me.

Yours sincerely,

***Parvis Khansari* - Corporate Director, Place**

Case Officer: **Timothy Furmidge**
Planning Officer (Minerals and Waste DM)
Strategic Planning

Direct line: 01225 770455

Email: timothy.furmidge@wiltshire.gov.uk

APPENDIX LIST

Appendix A – National Highways response.

Thank you for inviting National Highways (previously operating as the Highways Agency and Highways England) to provide comments on the above request for a scoping opinion. We are a Statutory Consultee on Planning Applications under the Town and Country Planning (Development Management Procedure) Order 2015 and in discharging this responsibility we act as a proactive partner and therefore welcome pre-application discussion. This includes the opportunity to provide advice on the scope of any Environmental Statement pursuant to the procedures set out in the Town and Country Planning (Environmental Impact Assessment) Regulations 2017, which also identifies us as a statutory party.

Therefore, whilst we have no view on whether the above development meets the requirements for an Environmental Statement, we offer comments on the assessment of traffic impacts that we would expect to accompany any planning application, as well as potential operational asset impacts that will require consideration by the applicant. Our comments relate to matters arising from our responsibilities to manage and maintain the strategic road network (SRN) which in this case comprises the A36 trunk road. Comments relating to the local road network should be sought from the appropriate Local Highway Authority.

We understand that the proposed development at Sandland will serve as an extension to the existing Brickworth Quarry following the exhaustion of reserves within the currently consented phases. Current output is estimated to be 150,000 tonnes per year with the remaining reserves expected to be exhausted in approximately 18 months. The existing permissions allow for extraction and remediation to be completed by 2028.

The proposed extension will provide for the extraction of approximately 125,000 tonnes per year over an 18-month period, with the extension to the planning permission expected to cover the period to 2030. The Sandlands site will not come into operation until the exhaustion of consented reserves. The development will continue to be served by the existing access to the Quarry which is provided by a signalised crossroads junction with the A36 and A27. No changes are proposed to the existing access arrangements.

The applicant is proposing to produce a transport technical note to support any application for planning permission. National Highways will expect the technical note/transport statement to provide sufficient information to enable us to understand the impact of development traffic on the A36 trunk road and at the signalised Brickworth Road junction.

We have therefore set out below both the general and specific areas of concern that National Highways would expect to see considered as part of any Environmental

Statement/application submission.

General aspects to be addressed

- An assessment of transport related impacts of the proposal should be carried out and reported as described in current national planning practice guidance.

- ♣ Environmental impacts arising from any disruption during construction, traffic volume, composition or routing change and transport infrastructure modification should be fully assessed and reported, along with the environmental impact of the road network upon the development itself.

- ♣ Adverse changes to noise and air quality should be considered, including in relation to compliance with the European air quality Limit Values and/or Local Authority designated Air Quality Management Areas (AQMAs) and World Health Organisation (WHO) criteria.

Location specific considerations

- The assessment of traffic impacts accompanying any application should consider the operation of the strategic road network in line with national planning practice guidance and DfT Circular 01/2022 The Strategic Road Network and the Delivery of Sustainable Development. Where proposals result in a severe congestion or unacceptable safety impact, mitigation will be required in line with current policy. In this case we will need to understand the impact of anticipated changes to trip generation resulting from the development and the ongoing suitability of the A36 signalised Brickworth Road junction to accommodate them.

- The effects of the proposed development should be assessed cumulatively with other schemes and we would expect the applicants to agree an appropriate list of schemes, including committed development in the area, with the local planning authority and National Highways.

These comments are only advisory as the responsibility for determining the scope and form of any EIA Report rests with the Local Planning Authority. Our comments are also provided on the basis of the information available to us at this time, and are made without prejudice to future advice and/or recommendations, which would be made on receipt of a formal planning application.

Appendix B Environment Agency response

Thank you for consulting the Environment Agency on the above EIA scoping opinion.

We have reviewed the following documents and offer the following advice related to our remit.

- Sandland Extension – Brickworth Quarry Regulation 15 Scoping Opinion Request

by Raymond Brown Quarry Products, April 2025.

- Working scheme drawing, WP/880/02, dated 08/04/25, rev A • Restoration scheme drawing, WP/880/03, dated 08/04/25, rev A
- Location plan

Protection of Controlled Waters

The EIA should, as a minimum, include an assessment of any potential impacts on the surface water and groundwater regime from the construction, operation and reinstatement of the site; and any proposed mitigation.

The site is within Source Protection Zone 3 (SPZ3) for the Hale boreholes public water supply and located on Secondary A Aquifer with Principal Aquifer to the northwest and below the sand mineral resource. Both geological units have a High Vulnerability to pollution.

Environmental Permit

We do not have enough information as part of this consultation to determine whether the proposal will require an environmental permit or meets the criteria for an exemption. The applicant is therefore referred to,

- Waste: environmental permits - GOV.UK
- Check if you need an environmental permit - GOV.UK

Waste

The site already carries out Waste Acceptance Criteria (WAC) testing and classifies materials before they are deposited under its current permit. We recommend continuing with WAC testing and ensuring that the sites supplying the materials confirm they are suitable. It would be helpful to have background information on the source site to confirm the materials—such as soils or aggregates—are non-hazardous. Reports from brownfield assessments and other evidence showing the materials are appropriate would also support this. Testing results from UKAS-accredited laboratories must be provided to confirm the materials are safe and suitable for use.

Biodiversity Net Gain (BNG)

Please consult with your authority's county ecologist on BNG.

Appendix C Archaeology response

The applicant has submitted a screening request document, which includes a section on archaeology (Paras 122 – 128). This section rightly notes that at present Wiltshire's Historic Environment Record (HER) shows no known heritage assets, whether designated or not, within the proposed quarry extension. However, the proposed site of the quarry extension, which comprises 3ha of previous undeveloped farmland, has never been subject to any archaeological prospection and so the presence and significance of any buried archaeological remains within the proposed quarry extension is currently unknown.

The applicant will be aware that several previously unknown archaeological monuments have been discovered within the existing quarry during quarry

operations. These include an Early Bronze Age (1,800 – 1,500 BC) pit, a Late Bronze Age (1,100 – 800 BC) urned cremation cemetery, and an area of Iron Age (800 – 100 BC) pits and post-holes, almost certainly the site of an Iron Age settlement. The detailed report on these discoveries is still awaited.

For this reason, archaeology should be scoped into any Environmental Impact Assessment for this scheme so that the archaeological implications of the proposed quarry extension are fully understood at the outset. As the accompanying Scoping Opinion Request document notes, archaeological desk-based assessment and geophysical survey should be undertaken to provide a preliminary assessment of the archaeological potential of the proposed quarry extension, which is likely to need to be followed by exploratory archaeological investigation through trial trenching.

This assessment will establish the presence, character, and significance of buried remains that will be impacted by the proposed quarry extension and enable appropriate mitigation measures to be determined, which might include the removal of highly significant buried remains from the area of proposed quarrying, archaeological investigation prior to the commencement of quarry operations, or archaeological monitoring and recording during the early stages of quarry operations. Until appropriate archaeological assessment has taken place, the mitigation proposed by the applicant of an archaeological watching brief during mineral extraction cannot be considered as adequate or sufficient.

I trust that this is satisfactory. Please do not hesitate to contact me if you would like to discuss this further or require any further information. I would be happy to discuss the scope of the archaeological assessment with the applicant or their archaeological consultant if that was helpful.

Appendix D Natural England Response

Thank you for seeking our advice on the scope of the Environmental Statement (ES) in the consultation dated 29th April 2025.

A robust assessment of environmental impacts and opportunities based on relevant and up to date environmental information should be undertaken prior to a decision on whether to grant planning permission. Annex A to this letter provides Natural England's advice on the scope of the Environmental Impact Assessment (EIA) for the proposed development.

Further guidance is set out in Planning Practice Guidance on Environmental Assessment, Natural Environment and Climate Change.

Should the proposal be amended in a way which significantly affects its impact on the natural environment then, in accordance with Section 4 of the Natural Environment and Rural Communities Act 2006, Natural England should be consulted again.

Please note that Natural England must be consulted on Environmental Statements. Please send any new consultations or further information on this consultation to:

consultations@naturalengland.org.uk.

Annex A – Natural England Advice on EIA Scoping

General Principles

Schedule 4 of the Town and Country Planning (Environmental Impact Assessment) Regulations 2017, sets out the information that should be included in an Environmental Statement (ES) to assess impacts on the natural environment. This includes:

- A description of the development – including physical characteristics and the full land use requirements of the site during construction and operational phases
- Expected residues and emissions (water, air and soil pollution, noise, vibration, light, heat, radiation etc.) resulting from the operation of the proposed development
- An assessment of alternatives and clear reasoning as to why the preferred option has been chosen
- A description of the aspects of the environment likely to be significantly affected by the development including biodiversity (for example fauna and flora), land, including land take, soil, water, air, climate (for example greenhouse gas emissions, impacts relevant to adaptation, cultural heritage and landscape and the interrelationship between the above factors
- A description of the likely significant effects of the development on the environment – this should cover direct effects but also any indirect, secondary, cumulative, short, medium, and long term, permanent and temporary, positive, and negative effects. Effects should relate to the existence of the development, the use of natural resources (in particular land, soil, water and biodiversity) and the emissions from pollutants. This should also include a description of the forecasting methods to predict the likely effects on the environment
- A description of the measures envisaged to prevent, reduce and where possible offset any significant adverse effects on the environment
- A non-technical summary of the information
- An indication of any difficulties (technical deficiencies or lack of know-how) encountered by the applicant in compiling the required information.

Further guidance is set out in Planning Practice Guidance on environmental assessment and natural environment.

Cumulative and In-Combination Effects.

The ES should fully consider the implications of the whole development proposal. This should include an assessment of all supporting infrastructure.

An impact assessment should identify, describe, and evaluate the effects that are likely to result from the project in combination with other projects and activities that are being, have been or will be carried out. The following types of projects should be included in such an assessment (subject to available information):

- a. existing completed projects;
- b. approved but uncompleted projects;
- c. ongoing activities;
- d. plans or projects for which an application has been made and which are under

consideration by the consenting authorities; and
e. plans and projects which are reasonably foreseeable, i.e. projects for which an application has not yet been submitted, but which are likely to progress before completion of the development and for which sufficient information is available to assess the likelihood of cumulative and in-combination effects.

Environmental Data

Natural England is required to make available information it holds where requested to do so. National datasets held by Natural England are available at:

<http://www.naturalengland.org.uk/publications/data/default.aspx>.

Detailed information on the natural environment is available at www.magic.gov.uk.

Natural England's SSSI Impact Risk Zones are a GIS dataset which can be used to help identify the potential for the development to impact on a SSSI. The dataset and user guidance can be accessed from the Natural England Open Data Geoportal. Natural England does not hold local information on local sites, local landscape character, priority habitats and species or protected species. Local environmental data should be obtained from the appropriate local bodies. This may include the local environmental records centre, the local wildlife trust, local geo-conservation group or other recording society.

Biodiversity and Geodiversity

General Principles

The National Planning Policy Framework (paragraphs 180-181 and 185-188) sets out how to take account of biodiversity and geodiversity interests in planning decisions. Further guidance is set out in Planning Practice Guidance on the natural environment.

The potential impact of the proposal upon sites and features of nature conservation interest and opportunities for nature recovery and biodiversity net gain should be included in the assessment.

Ecological Impact Assessment (EclA) is the process of identifying, quantifying, and evaluating the potential impacts of defined actions on ecosystems or their components. EclA may be carried out as part of the EIA process or to support other forms of environmental assessment or appraisal. Guidelines have been developed by the Chartered Institute of Ecology and Environmental Management (CIEEM).

Local planning authorities have a duty to have regard to conserving biodiversity as part of their decision making. Conserving biodiversity can include habitat restoration or enhancement.

Designated Nature Conservation Sites

International and European Sites

The development site is within or may impact on the following European / internationally designated nature conservation site(s):

- Solent and Southampton Water Ramsar
- Solent and Southampton Water Special Protection Area (SPA)
- The New Forest Ramsar
- The New Forest Special Area of Conservation (SAC)
- The New Forest Special Protection Area (SPA)

European site conservation objectives are available at:

<http://publications.naturalengland.org.uk/category/6490068894089216>

The ES should thoroughly assess the potential for the proposal to affect nationally and internationally designated sites of nature conservation importance, including marine sites where relevant. European sites (Special Areas of Conservation (SAC) and Special Protection Areas (SPA) fall within the scope of the Conservation of Habitats and Species Regulations 2017 (the 'Habitats Regulations'). In addition paragraph 181 of the National Planning Policy Framework (NPPF) requires that potential SPAs, possible SAC, listed or proposed Ramsar sites, and any site identified or required as compensatory measures for adverse effects on habitat (European) sites, potential SPAs, possible SACs and listed or proposed Ramsar sites have the same protection as classified sites (NB. sites falling within the scope of regulation 8 of the Conservation of Habitats and Species Regulations 2017 are defined as 'habitats sites' in the NPPF). Under Regulation 63 of the Habitats Regulations, an appropriate assessment must be undertaken in respect of any plan or project which is (a) likely to have a significant effect on a European site (either alone or in combination with other plans or projects) and (b) not directly connected with or necessary to the management of the site.

Should a likely significant effect on a European/Internationally designated site be identified (either alone or in-combination) or be uncertain, the competent authority (in this case the Local Planning Authority) may need to prepare an appropriate assessment in addition to the consideration of impacts through the EIA process. Further guidance is set out in Planning Practice Guidance on appropriate assessment:

<https://www.gov.uk/guidance/appropriate-assessment>

This should also take into account any agreed strategic mitigation solution that may be being developed or implemented in the area to address recreational disturbance, nutrients, or other impacts.

Nationally Designated Sites

The development site is within or may impact on the following Sites of Special Scientific Interest:

- Langley Wood and Homan's Copse Site of Special Scientific Interest (SSSI)
- The New Forest Site of Special Scientific Interest (SSSI)

Sites of Special Scientific Interest are protected under the Wildlife and Countryside

Act 1981 and paragraph 186 of the NPPF. Further information on the SSSI and its special interest features can be found at www.magic.gov.

Natural England's SSSI Impact Risk Zones can be used to help identify the potential for the development to impact on a SSSI. The dataset and user guidance can be accessed from the Natural England Open Data Geoportal.

The Environmental Statement should include a full assessment of the direct and indirect effects of the development on the features of special interest within the SSSI and identify appropriate mitigation measures to avoid, minimise or reduce any adverse significant effects.

Regionally and Locally Important Sites

The ES should consider any impacts upon local wildlife and geological sites, including local nature reserves. Local Sites are identified by the local wildlife trust, geoconservation group or other local groups and protected under the NPPF (paragraph 180 and 181). The ES should set out proposals for mitigation of any impacts and if appropriate, compensation measures and opportunities for enhancement and improving connectivity with wider ecological networks. Contact the relevant local body for further information.

Protected Species

The conservation of species protected under the Wildlife and Countryside Act 1981 and the Conservation of Habitats and Species Regulations 2017 is explained in Part IV and Annex A of Government Circular 06/2005 Biodiversity and Geological Conservation: Statutory Obligations and their Impact within the Planning System.

The ES should assess the impact of all phases of the proposal on protected species (including, for example, great crested newts, reptiles, birds, water voles, badgers and bats). Natural England does not hold comprehensive information regarding the locations of species protected by law. Records of protected species should be obtained from appropriate local biological record centres, nature conservation organisations and local groups. Consideration should be given to the wider context of the site, for example in terms of habitat linkages and protected species populations in the wider area.

The area likely to be affected by the development should be thoroughly surveyed by competent ecologists at appropriate times of year for relevant species and the survey results, impact assessments and appropriate accompanying mitigation strategies included as part of the ES. Surveys should always be carried out in optimal survey time periods and to current guidance by suitably qualified and, where necessary, licensed, consultants.

Natural England has adopted Standing Advice for protected species, which includes guidance on survey and mitigation measures. A separate protected species licence from Natural England or Defra may also be required.

District Level Licensing for Great Crested Newts

District level licensing (DLL) is a type of strategic mitigation licence for great crested newts (GCN) granted in certain areas at a local authority or wider scale. A DLL scheme for GCN may be in place at the location of the development site. If a DLL scheme is in place, developers can make a financial contribution to strategic, off-site habitat compensation instead of applying for a separate licence or carrying out individual detailed surveys. By demonstrating that DLL will be used, impacts on GCN can be scoped out of detailed assessment in the Environmental Statement.

Priority Habitats and Species

Priority Habitats and Species are of particular importance for nature conservation and included in the England Biodiversity List published under section 41 of the Natural Environment and Rural Communities Act 2006. Most priority habitats will be mapped either as Sites of Special Scientific Interest, on the Magic website or as Local Wildlife Sites. Natural England does not routinely hold species data. Such data should be collected when impacts on priority habitats or species are considered likely.

Consideration should also be given to the potential environmental value of brownfield sites, often found in urban areas and former industrial land. Sites can be checked against the (draft) national Open Mosaic Habitat (OMH) inventory published by Natural England and freely available to download.

An appropriate level habitat survey should be carried out on the site, to identify any important habitats present. In addition, ornithological, botanical, and invertebrate surveys should be carried out at appropriate times in the year, to establish whether any scarce or priority species are present.

The Environmental Statement should include details of:

- Any historical data for the site affected by the proposal (e.g. from previous surveys)
- Additional surveys carried out as part of this proposal
- The habitats and species present
- The status of these habitats and species (e.g. whether priority species or habitat)
- The direct and indirect effects of the development upon those habitats and species
- Full details of any mitigation or compensation measures
- Opportunities for biodiversity net gain or other environmental enhancement

Ancient Woodland, Ancient and Veteran Trees

The ES should assess the impacts of the proposal on the ancient woodland and any ancient and veteran trees, and the scope to avoid and mitigate for adverse impacts. It should also consider opportunities for enhancement.

Natural England maintains the Ancient Woodland Inventory which can help identify ancient woodland.

The wood pasture and parkland inventory sets out information on wood pasture and parkland.

The ancient tree inventory provides information on the location of ancient and veteran trees.

Natural England and the Forestry Commission have prepared standing advice on ancient woodland, ancient and veteran trees.

Biodiversity Net Gain

Paragraph 180 of the NPPF states that decisions should contribute to and enhance the natural and local environment by minimising impacts on and providing net gains for biodiversity, including by establishing coherent ecological networks that are more resilient to current and future pressures.

Biodiversity Net Gain is additional to statutory requirements relating to designated nature conservation sites and protected species.

Proposals for mandatory biodiversity net gain should be in line with the Environment Act 2021 and supporting regulations. Further information on biodiversity net gain, including draft Planning Practice Guidance.

The statutory biodiversity metric, together with ecological advice, should be used to calculate the change in biodiversity resulting from proposed development and demonstrate how proposals can achieve a net gain.

The metric should be used to:

- assess or audit the biodiversity unit value of land within the application area
- calculate the losses and gains in biodiversity unit value resulting from proposed development
- demonstrate that the required percentage biodiversity net gain will be achieved

Biodiversity Net Gain outcomes can be achieved on site, off-site or through a combination of both. On-site provision should be considered first. Delivery should create or enhance habitats of equal or higher value. When delivering net gain, opportunities should be sought to link delivery to relevant plans or strategies e.g. Green Infrastructure Strategies or Local Nature Recovery Strategies.

Opportunities for wider environmental gains should also be considered.

Landscape

Nationally Designated Landscapes

The development site is within or may impact on the New Forest National Park. The NPPF (paragraph 189) provides the highest level of planning protection for these nationally designated landscapes. Public bodies have a duty to seek to further the statutory purposes of designation in carrying out their functions (under section 245 of the Levelling Up and Regeneration Act 2023). This duty also applies to proposals outside the designated area but impacting on its natural beauty.

Consideration should be given to the direct and indirect effects on this designated

landscape and in particular the effect upon its purpose for designation. The management plan for the designated landscape may also have relevant information that should be considered in the EIA.

Landscape and Visual Impacts

The environmental assessment should refer to the relevant National Character Areas. Character area profiles set out descriptions of each landscape area and statements of environmental opportunity. The ES should include a full assessment of the potential impacts of the development on local landscape character using landscape assessment methodologies. We encourage the use of Landscape Character Assessment (LCA), based on the good practice guidelines produced jointly by the Landscape Institute and Institute of Environmental Assessment in 2013. LCA provides a sound basis for guiding, informing, and understanding the ability of any location to accommodate change and to make positive proposals for conserving, enhancing or regenerating character.

A landscape and visual impact assessment should also be carried out for the proposed development and surrounding area. Natural England recommends use of the methodology set out in Guidelines for Landscape and Visual Impact Assessment 2013 ((3rd edition) produced by the Landscape Institute and the Institute of Environmental Assessment and Management. For National Parks and AONBs, we advise that the assessment also includes effects on the 'special qualities' of the designated landscape, as set out in the statutory management plan for the area. These identify the particular landscape and related characteristics which underpin the natural beauty of the area and its designation status.

The assessment should also include the cumulative effect of the development with other relevant existing or proposed developments in the area. This should include an assessment of the impacts of other proposals currently at scoping stage.

To ensure high quality development that responds to and enhances local landscape character and distinctiveness, the siting and design of the proposed development should reflect local characteristics and, wherever possible, use local materials. Account should be taken of local design policies, design codes and guides as well as guidance in the National Design Guide and National Model Design Code. The ES should set out the measures to be taken to ensure the development will deliver high standards of design and green infrastructure. It should also set out detail of layout alternatives, where appropriate, with a justification of the selected option in terms of landscape impact and benefit.

Heritage Landscapes

The ES should include an assessment of the impacts on any land in the area affected by the development which qualifies for conditional exemption from capital taxes on the grounds of outstanding scenic, scientific, or historic interest. An up-to-date list is available at www.hmrc.gov.uk/heritage/lbsearch.htm.

Connecting People with Nature

The ES should consider potential impacts on access land, common land, public rights of way and, where appropriate, the England Coast Path and coastal access routes and coastal margin in the vicinity of the development, in line with NPPF paragraph 100. It should assess the scope to mitigate for any adverse impacts. Rights of Way Improvement Plans (ROWIP) can be used to identify public rights of way within or adjacent to the proposed site that should be maintained or enhanced.

Measures to help people to better access the countryside for quiet enjoyment and opportunities to connect with nature should be considered. Such measures could include reinstating existing footpaths or the creation of new footpaths, cycleways, and bridleways.

Links to other green networks and, where appropriate, urban fringe areas should also be explored to help promote the creation of wider green infrastructure. Access to nature within the development site should also be considered, including the role that natural links have in connecting habitats and providing potential pathways for movements of species.

Relevant aspects of local authority green infrastructure strategies should be incorporated where appropriate.

Soils and Agricultural Land Quality

Soils are a valuable, finite natural resource and should also be considered for the ecosystem services they provide, including for food production, water storage and flood mitigation, as a carbon store, reservoir of biodiversity and buffer against pollution. It is therefore important that the soil resources are protected and sustainably managed. Impacts from the development on soils and best and most versatile (BMV) agricultural land should be considered in line with paragraphs 180 and 181 of the NPPF. Further guidance is set out in the Natural England Guide to assessing development proposals on agricultural land.

As set out in paragraph 217 of the NPPF, new sites or extensions to sites for peat extraction should not be granted planning permission.

The following issues should be considered and, where appropriate, included as part of the Environmental Statement (ES):

- The degree to which soils would be disturbed or damaged as part of the development
- The extent to which agricultural land would be disturbed or lost as part of this development, including whether any best and most versatile (BMV) agricultural land would be impacted.

This may require a detailed Agricultural Land Classification (ALC) survey if one is not already available. For information on the availability of existing ALC information see www.magic.gov.uk.

- Where an ALC and soil survey of the land is required, this should normally be at a detailed level, e.g. one auger boring per hectare, (or more detailed for a small site)

supported by pits dug in each main soil type to confirm the physical characteristics of the full depth of the soil resource, i.e. 1.2 metres. The survey data can inform suitable soil handling methods and appropriate reuse of the soil resource where required (e.g. agricultural reinstatement, habitat creation, landscaping, allotments and public open space).

- The ES should set out details of how any adverse impacts on BMV agricultural land can be minimised through site design/masterplan.
- The ES should set out details of how any adverse impacts on soils can be avoided or minimised and demonstrate how soils will be sustainably used and managed, including consideration in site design and master planning, and areas for green infrastructure or biodiversity net gain. The aim will be to minimise soil handling and maximise the sustainable use and management of the available soil to achieve successful after-uses and minimise off-site impacts.

Further information is available in the Defra Construction Code of Practice for the Sustainable Use of Soil on Development Sites and The British Society of Soil Science Guidance Note Benefitting from Soil Management in Development and Construction.

The following additional guidance is provided for minerals and waste development. The ES should consider and, where appropriate, include the following:

- The methods and equipment to be used for the protection, recovery, storage, and sustainable re-use of the different types of topsoil and subsoil, including consideration of any required phasing to minimise soil handling and maximise the sustainable management of the soil.
- The method of assessing whether soils are in a suitably dry condition to be handled (i.e. dry and friable), and the avoidance of soil handling, trafficking, and cultivation during the wetter winter period.
- A description of the restoration criteria, including the proposed soil horizon depths and soil characteristics; normally to an overall depth of 1.2 m over an evenly graded overburden layer (or, in the case of waste reclamation, an evenly graded capping layer), suitable for the proposed end-use, including the restored ALC Grade.
- The effects on land drainage, agricultural access, and water supplies, including other agricultural land in the vicinity. The impacts of the development on farm structure and viability, and on other established rural land use and interests, both during the site working period and following its reclamation.
- The restoration and aftercare of the site, in line with Chapter 17 'Facilitating the Sustainable Use of Minerals' of the NPPF.
- A detailed Restoration Plan illustrating the restored soil profile characteristics, landform and the intended standard of restoration including ALC Grade(s), together with details of surface features; water bodies; the availability of outfalls to accommodate future drainage requirements; and aftercare.

Further guidance is contained in the Defra Guidance for Successful Restoration of Mineral and Waste Sites and the Natural England guidance note Planning and aftercare advice for reclaiming land to agricultural use. Reference could also usefully be made to the Institute of Quarrying (2021) Good Practice Guide for Handling Soils in Mineral Workings which comprises separate sections, describing the typical choice of machinery and methods for handling soils at various phases. The techniques described by Sheets A-D are appropriate for the successful

reinstatement of higher quality agricultural land. The Natural England Guide to reclaiming mineral extraction and landfill sites to agriculture also contains useful background information.

Air Quality

Air quality in the UK has improved over recent decades but air pollution remains a significant issue. For example, approximately 85% of protected nature conservation sites are currently in exceedance of nitrogen levels where harm is expected (critical load) and approximately 87% of sites exceed the level of ammonia where harm is expected for lower plants (critical level of 1µg) [1]. A priority action in the England Biodiversity Strategy is to reduce air pollution impacts on biodiversity. The Government's Clean Air Strategy also has a number of targets to reduce emissions including to reduce damaging deposition of reactive forms of nitrogen by 17% over England's protected priority sensitive habitats by 2030, to reduce emissions of ammonia against the 2005 baseline by 16% by 2030 and to reduce emissions of NO_x and SO₂ against a 2005 baseline of 73% and 88% respectively by 2030. Shared Nitrogen Action Plans (SNAPs) have also been identified as a tool to reduce environmental damage from air pollution.

The planning system plays a key role in determining the location of developments which may give rise to pollution, either directly, or from traffic generation, and hence planning decisions can have a significant impact on the quality of air, water and land. The ES should take account of the risks of air pollution and how these can be managed or reduced. This should include taking account of any strategic solutions or SNAPs, which may be being developed or implemented to mitigate the impacts on air quality.

Further information on air pollution impacts and the sensitivity of different habitats/designated sites can be found on the Air Pollution Information System (www.apis.ac.uk).

Information on air pollution modelling, screening and assessment can be found on the following websites:

- SCAIL Combustion and SCAIL Agriculture - <http://www.scail.ceh.ac.uk/>
- Ammonia assessment for agricultural development
<https://www.gov.uk/guidance/intensive-farming-risk-assessment-for-your-environmental-permit>
- Environment Agency Screening Tool for industrial emissions
<https://www.gov.uk/guidance/air-emissions-risk-assessment-for-your-environmental-permit>
- Defra Local Air Quality Management Area Tool (Industrial Emission Screening Tool) – England <http://www.airqualityengland.co.uk/laqm>

Water Quality

The planning system plays a key role in determining the location of developments which may give rise to water pollution, and hence planning decisions can have a significant impact on water quality, and land. The assessment should take account of the risks of water pollution and how these can be managed or reduced. A number of

water dependent protected nature conservation sites have been identified as failing condition due to elevated nutrient levels and nutrient neutrality is consequently required to enable development to proceed without causing further damage to these sites. The ES needs to take account of any strategic solutions for nutrient neutrality or Diffuse Water Pollution Plans, which may be being developed or implemented to mitigate and address the impacts of elevated nutrient levels. Further information can be obtained from the Local Planning Authority.

Climate Change

The ES should identify how the development affects the ability of the natural environment (including habitats, species, and natural processes) to adapt to climate change, including its ability to provide adaptation for people. This should include impacts on the vulnerability or resilience of a natural feature (i.e. what's already there and affected) as well as impacts on how the environment can accommodate change for both nature and people, for example whether the development affects species ability to move and adapt. Nature-based solutions, such as providing green infrastructure on-site and in the surrounding area (e.g. to adapt to flooding, drought and heatwave events), habitat creation and peatland restoration, should be considered. The ES should set out the measures that will be adopted to address impacts.

Further information is available from the Committee on Climate Change's (CCC) Independent Assessment of UK Climate Risk, the National Adaptation Programme (NAP), the Climate Change Impacts Report Cards (biodiversity, infrastructure, water etc.) and the UKCP18 climate projections.

The Natural England and RSPB Climate Change Adaptation Manual (2020) provides extensive information on climate change impacts and adaptation for the natural environment and adaptation focused nature-based solutions for people. It includes the Landscape Scale Climate Change Assessment Method that can help assess impacts and vulnerabilities on natural environment features and identify adaptation actions. Natural England's Nature Networks Evidence Handbook (2020) also provides extensive information on planning and delivering nature networks for people and biodiversity.

The ES should also identify how the development impacts the natural environment's ability to store and sequester greenhouse gases, in relation to climate change mitigation and the natural environment's contribution to achieving net zero by 2050. Natural England's Carbon Storage and Sequestration by Habitat report (2021) and the British Ecological Society's nature-based solutions report (2021) provide further information.

Contribution to Local Environmental Initiatives and Priorities

The ES should consider the contribution the development could make to relevant local environmental initiatives and priorities to enhance the environmental quality of the development and deliver wider environmental gains. This should include considering proposals set out in relevant local strategies or supplementary planning documents including landscape strategies, green infrastructure strategies, tree and

woodland strategies, biodiversity strategies or biodiversity opportunity areas.

Appendix E Public Protection Response

The proposed extension brings the quarry closer to residential dwellings to the north and east of the site. As such there is a potential for adverse noise and dust impacts from the quarry.

Noise

I note that a noise impact assessment is proposed to determine the current baseline conditions and the potential noise generation from the proposed quarry extension. Furthermore it is confirmed that "ambient noise surveys will be undertaken at residential receptors around the site. Source-term sound power levels of the plant that will be used within the proposed site will be obtained. The noise emission from the operations associated with the quarry will be calculated using the propagation guidance of BS 5228:1. The noise level from the proposed operations will be calculated at each receptor for each stage of development". I will require that background levels are as presented as a mean, mode and median to ensure representation of the existing noise environment and to account for any uneven spread of data. Background measurements should take place over the quieter part of normal daytime working hours and should be representative of the background sound levels in those areas during the proposed hours of working of 07.00 - 18.00 Monday to Friday and 08.00 - 12.30 on Saturday. If equipment is used at night eg de watering pumps and generators then background measurements should be taken at night. We will expect a combination of attended and unattended monitoring to be undertaken.

Where any site noise sources have a significant tonal element, it may be appropriate to set specific limits to control this aspect. Peak or impulsive noise, which may include some reversing beepers, may also require separate limits that are independent of background noise (eg Lmax in specific octave or third-octave frequency bands – and that should not be allowed to occur regularly at night.

Noise modelling

At each noise receptor, please provide each item of plant operating and for each item of plant provide the following in a spreadsheet:

- Source-receptor distance
- Ground height
- Working height/depth (if different from ground height)
- Noise source height
- Barrier-receptor distance
- Barrier height
- Assumed attenuation from barrier
- Soft ground %
- Assumed ground attenuation
- Resultant LAeq at the receptor

The above data should be presented for each noise sensitive receptor as a worst case assumption with all plant and processes involved in each phase operating at the same time.

In addition to the above noise predictions, we will require spatial SoundPLAN modelling to be undertaken for the various stages considered in the calculations with a worst case scenario presented for the nearest receptors to each working phase in terms of the locations of the noise sources included. The model should use 1-2 dB contours and be based on the calculations in the spreadsheets and assessment with regard to source sound power levels, heights and on-times, topographic detail and any barriers/bunds.

The noise assessment should be presented and assessed in relation to compliance with noise criteria and thresholds contained within the PPG Minerals.

Dust

There is a potential for loss of amenity if dust management procedures are not identified or implemented. We note that the existing Brickworth Quarry is operated in accordance with an approved Dust Control Management Scheme which places a range of controls on operations in order to limit fugitive dust emissions. The applicant has confirmed that due to the proximity of a number of dwellings, it is proposed to produce an updated Air Quality Technical Note that will review the existing operation and adopted mitigation measures and their effectiveness.

Air quality dust impacts will be assessed using the latest planning guidance from Environmental Protection UK (EPUK), the Institute of Air Quality Management (IAQM) and the Department for Environment, Food and Rural Affairs (Defra) and the results presented within the ES.

I would ask that in addition to the above, the proposed air quality assessment considers dust mitigation techniques associated with soil stripping, storage and reinstatement, mineral extraction and handling, mobile plant (on site), off-site haulage and preventing wind scouring of exposed surfaces.

END OF DOCUMENT