



# Appendix D.2 Scoping Opinion



## Northamptonshire County Council

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Please ask for: Phil Watson  
Tel: 01604 366638  
Our ref: 15/00001/SCO  
Your ref:  
Date: 13<sup>th</sup> January 2016

Dear Mark

### **TOWN AND COUNTRY PLANNING (ENVIRONMENTAL IMPACT ASSESSMENT REGULATIONS 2011: REGULATION 13 SCOPING OPINION Proposals for Scope and Content of an Environmental Impact Assessment for sand and gravel extraction and restoration at Great Billing, Northampton**

I refer to your email dated *19 October 2015* and the accompanying scoping report. The scoping report has been the subject of consultation in accordance with the Environmental Impact Assessment (EIA) Regulations and copies of the responses have been emailed to you.

I note that the proposed overall scope and methodology for the EIA is in section 6 of the scoping report, with the specific topics scoped in listed in paragraph 6.1.1. Whilst I can confirm that the overall methodology of the approach is acceptable there have been comments which need to be taken into account. In particular it is considered that 'odour' impact should also be scoped in to the Environmental Statement (ES) (see consultation response from both Wellingborough (WBC) and Northampton Borough (NBC) Environmental Protection Officer responses. Additionally, Natural England do not agree with the impact on soils being scoped out of the ES as the majority of the site is agricultural land and there could be significant impact on land quality if this is not given detailed consideration.

It is important that the consultant reports which will accompany the ES take account of the latest phasing and restoration plans which accompanied the latest scoping report (or any future changes to these) as these have changed since the 2012 scoping opinion, particularly in relation to the location of the plant site and silt management areas, and the introduction of the introduction of the Poplar tree belt. This is particularly relevant for the landscape and visual impact assessments and may be relevant to the ecology assessment.

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Northamptonshire  
County Council

Please take account of all the comments received in the consultation responses. In particular I draw your attention to the following which I have dealt with under topic matter:

### Landscape and Visual Impact

I understand the proposed viewpoints for visual impact were agreed between your consultant and Tina Cuss my ecology and landscape advisor. I also draw your attention to the comments from Northampton Borough Council (NBC) (Regeneration, Enterprise and Planning) dated 11 January 2016, which advocated that the list of visual receptors should include the residential area to the east and south of Ecton Brook Road and the Ecton Lane Travellers site. Please consider if there is a view of the development site and associated operations from these locations.

It is also suggested by my ecology and landscape advisor that the proposal for planting a screening belt of Poplar trees should be carefully considered in relation to how suitable it is in landscape terms (and its potential impact on ground nesting birds).

The landscape and visual amenity impacts of the plant site and water and silt management areas also need to be assessed.

### Ecology

Please refer to the detailed comments provided by the County Council's Ecology Advisor (Tina Cuss), Natural England and the Wildlife Trust in conjunction with the paragraphs below

The ES should include a full assessment of the direct and indirect effects of the development on the features of special interest within the nearby the Upper Nene Valley Gravel Pit (SSSI, SPA, Ramsar) and identify mitigation measures as may be required in order to avoid, minimise or reduce and significant adverse effects.

The scoping report does not mention the Nene Valley Nature Improvement Area (NIA) and therefore this needs to be taken into account. In this context the Wildlife Trust consider that the restoration scheme is based too much on agricultural land and not enough on natural habitats /BAP Priority Habitat Areas.

The Ecology Advisor does not agree with the proposal that the protection of newts is given no further consideration. Some newts were found and the site has potential to support Great Crested Newts. The populations of Grass Snake, Smooth Newt and frogs need to be protected and adequate mitigation provided in accordance with best practice guidance.

In respect of ecological enhancement, reference in the ES should be made to two Supplementary Planning Documents relating to biodiversity and the Upper Nene Valley

Gravel Pits on the North Northamptonshire Joint Planning Unit website at:  
<http://www.nnjpu.org.uk/publications/default.asp>

### Transportation and Access

There are Public Rights of Way (PROW) and Byways running through and along the site, including the Northampton Round Route. The Highway Authority commented in 2012 that ideally these routes should be kept open and safe for public use and/or temporarily diverted and restored after extraction. The proposed access road and internal haul road cross TE10 twice within the site. The transport and access section of the scoping report doesn't refer to the impacts on the PROW's and the users thereof and this needs to be assessed. To help address concerns regarding PROW, the application should be accompanied by a construction management plan including detail of how the site would be managed with regard to TE10 and the need to minimise disturbance to users and the surface of TE10.

It is considered that this proposal may provide opportunities to improve access to the area and the wider Nene Valley. This should be explored through the ES.

Northamptonshire Highways would wish to discuss the scope of the Transport Assessment prior to it being undertaken and submitted. Contact details are on its consultation response.

Highways England makes a number of points to be considered in its response dated 22 December 2015

### Amenity Impacts

#### *Air Quality (including Dust) and Noise, Lighting*

Dust and noise are considered likely to be the most difficult amenity issues to mitigate with regard to this site. It is acknowledged that control measures are proposed but the Environmental Statement (ES) would need to demonstrate that impacts from dust and noise would be mitigated under these proposals. It is suggested that noise and dust management plans should be submitted at the application stage to help address these issues up front.

The proposed approach on noise and vibration is generally considered to be appropriate by the Environmental Protection Officers (EHO). The NBC EHO refers to the need to use broadband reversing alarms and the noise management plan should also include a management process to seek to achieve similar alarms on HGV's delivering waste soils to the site. The off-site nuisance impact of tonal reversing alarms should not be underestimated.

### *Odour*

Odour has been raised as a concern in consultation responses from the EHO's at NBC and WBC. It is recognised by the Mineral Planning Authority (MPA) that mineral working and inert waste operations are not likely to generate odour issues but in this case the site was previously used for sewage sludge disposal. In light of this, and given the ongoing odour issues associated with the nearby sewage treatment works and green waste composting site, it is considered that odour should be addressed in the ES.

### *Lighting*

Information should be included in the ES to address amenity impacts from any temporary or permanent lighting and should be extended to include potential impacts on ecology.

### *Air Quality*

The WBC EHO requires the approach to the air quality assessment to be discussed and agreed prior to it being undertaken.

The air quality assessment should include assessments of potential impacts on ecological receptors as well as other sensitive receptors.

### Hydrology, Hydrogeology and Flood Risk

Given the location (including land within flood zones 1 and 2) and the size of the site (greater than 1.0 hectare) the ES would need to consider all sources of flooding and provide a Flood Risk Assessment. I refer you to the Environment Agency response dated 28 June 2012 (attached) which provides a detail response to the previous scoping report (this 2012 response is provided because the recent consultation inadvertently omitted the Environment Agency. A late consultation has been sent and will be forwarded when received).

Since 2012 some responsibilities for surface water flood and drainage have been passed to the Northamptonshire County Council. Please refer to the consultation response from the Surface Water Drainage Assessment Team dated 22 December 2015 which requires that the ES to fully consider the impact of the development on surface water.

### Archaeology and Cultural Heritage

The County Council Archaeology Advisor has stated in the consultation response that the non-intrusive and desk based assessment undertaken within the study area are out of date and need to be revised. The current baseline information suggests a high potential for archaeological activity which need to be tested by intrusive works (trial trenching). More details are provided in the consultation response. It is important that the requirements of the archaeological evaluation are discussed and agreed with the archaeology advisor before completing the Environmental Statement.

## Contamination

The intention to include an assessment of contamination is supported. The EA's 2012 response refers to a previous risk assessment at this site. In particular the EA is aware that there is a phosphate impact on the River Nene in this area and that any application would be expected to assess the potential impacts of working the contaminated land in light of previous sewage sludge disposal.

The EA has requested further information be included in the ES regarding how minerals are processed as it is considered wash waters could become contaminated. This would necessitate that settlement lagoons be built into the design to contain contaminated fines. The EA has also asked for clarification about proposals to avoid flood waters coming into contact with contaminated soils

## Soils

Detailed comments regarding soils have been provided by Natural England. These should be taken into account in preparing the ES. Impacts on agricultural land are particularly relevant to the site and the proposed restoration.

## Cumulative Impact

It is considered important that the assessment addresses cumulative impacts on amenity (noise, dust, odour), landscape, biodiversity (including green infrastructure) and highways matters. This assessment should relate to both impacts generated from the subject site and in conjunction with surrounding developments, (existing, approved, proposed and likely) in particular the two permitted quarries at Earls Barton Spinney and land west of Grendon Road, Earls Barton.

## Restoration

Responses from the RSPB (in 2012) and Wildlife Trust include concerns about the proposed restoration. In particular the responses consider the site offers significant potential for restoration with biodiversity and green infrastructure benefits over and above what is currently being proposed. In particular it is noted the site is located within a Nature Improvement Area where restoring biodiversity is considered a high priority. There may also be opportunities through restoration to further improve flood alleviation measures. It is noted that the EIA Scoping report (paragraph 7.3.12) states that: "*opportunities for ecological enhancement of the site following restoration will be explored during the design process*". It is important that these opportunities are explored before the application is submitted. I note the restoration strategy plan with the scoping report; however this should be discussed further with the other organisations prior to submission. Paragraph 7.3.14

refers to consultation with other organisations and the RSPB should be added to those listed.

### Alternatives

I note that the proposed location of the plant site and settlement lagoons has changed since 2012. The ES should consider this and (any other relevant alternatives considered) relating to the environmental impacts of the alternatives and the reason for the choice made.

### 2012 Scoping Opinion

The 2012 scoping opinion has been appended to the scoping report and the contents therein should also be taken into account.

Please let me know if I can be of any further assistance.

Yours sincerely

A handwritten signature in black ink, appearing to read 'G. P. Watson'. The signature is written in a cursive style with a long horizontal stroke at the end.

Development Control Manager

On behalf of Assistant Director Environment and Planning



## Northamptonshire County Council

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### memo

To: Phil Watson  
From: Tina Cuss  
Ref: 15/00001/SCO  
Date: 14 January 2016

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**TOWN AND COUNTRY PLANNING (ENVIRONMENTAL IMPACT ASSESSMENT) REGULATIONS 2011 SCOPING REQUEST CONSULTATION - REGULATION 13**  
**PROPOSED DEVELOPMENT: Land to the South of Lower Ecton Lane**  
**LOCATION: Land Adjacent A45 Nene Valley Way, Ecton, Wellingborough**

The submitted EIA Scoping Report generally appears to covers sufficient detail and the appropriate information in relation to the assessment of potential impact on the proposals on the natural environment.

I have a small number of comments to make on the details of the assessment that should be provided with the final Planning Application and Environmental Statement:

#### **Landscape Visual Impact Assessment**

I am generally satisfied with the approach and the methodology proposed to be used in the Landscape and Visual Impact Assessment. I note that the applicant's Landscape Architect has provided a later revision of the Proposed Viewpoint Locations to that referred to in the EIA Scoping Report.

I am concerned that the Poplar tree belt would provide little screening benefit during the life of the excavation phase. This additional feature in the long term could appear incongruous in the landscape and may therefore not be of positive landscape benefit. The planting belt could also have a negative impact on ground nesting birds and other bird species for which the land will be restored. I consider that the existing woodland to the east would provide better screening for the Plant and Operations Area I therefore recommend that the location be reconsidered.

#### **Ecology**

There are a small number of statements made in the EIA Scoping Report that are incorrect or misleading.

While according to the Ecologist's Habitat Suitability Index assessment the ponds on and adjacent to the site score good and excellent, the EIA Scoping Report states that the ponds are of low suitability for Great Crested Newts. The ponds on the site support a small population of smooth newts and one Palmate Newt which is a Northamptonshire Biodiversity Action Plan Species was also recorded on the site. The site supports populations of Grass Snake, Smooth Newt and Frogs and has the future potential to support Great Crested Newts. The amphibians and reptiles need to be protected and adequate mitigation provided in accordance with best practice guidance. I would therefore not agree with the applicant's proposal that the protection of newts is not given any further consideration.

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Further information on the location of badger setts and an otter holt is available within the detailed ecological assessment carried out in support of planning applications for Mineral and Waste development immediately to the west and the east of this site. I would be happy to share this data with the applicant's ecologist in order to inform the final Ecological Impact Assessment.

From the wintering bird surveys undertaken to date I understand the site does not appear to support protected SPA birds. Further consideration should be given to the detail of restoration proposals particularly to the location of the woodland, Poplar tree belt and hedgerow trees where these might have negative impacts on provision of enhancement for the SPA or wetland birds and the ground-nesting birds such as Skylark recorded breeding around the site.

I am satisfied that currently further surveys for Watervole, Dormouse and White-clawed Crayfish are not required. It may be necessary for some ecological surveys to be repeated if the EIA is not submitted within the next 12 months.

I note that the Ecological Surveys, Impact Assessment and Mitigation Strategy that the applicant recently provided includes a copy of the 2008 Concept Restoration Plan but does not include the Restoration Strategy Plan 30755-3005-01 or the Phasing Plan included in the EIA Scoping Report. Further detailed consideration should be given to the proposals for phasing and the location of the Plant and Silt and Water Management areas in order to avoid and mitigate negative impacts on ecology.

### **Restoration and Ecological Enhancement**

I again welcome the applicant's intention to identify opportunities for ecological enhancement following restoration as part of the design and to consult with relevant interested parties. However, it does not appear that these opportunities have been incorporated into the Restoration Strategy Plan as yet. The MPA and former ecological consultees have previously expressed concerns that the restoration scheme could provide significantly more biodiversity benefits over and above what is currently being proposed. I would suggest that consideration might be given to consulting with RSPB as well as the Wildlife Trust as part of the consultation recommended in paragraph 7.3.13. I note that consultation with the Mineral Planning Authority's ecological advisors is not mentioned.

As in the MPA's previous Scoping Response, I suggest that detailed discussions with the RSPB, Wildlife Trust, Natural England and the MPA on restoration are recommended in advance of any application. The application site is within the Nene Valley Nature Improvement Area and the restoration proposals do not appear to take full account of the potential for post restoration ecological enhancement to grassland and wetland BAP habitats as identified in the Nene Valley Habitat Opportunity Mapping and M&WPA's Assessment of Opportunities for habitat creation document.

The applicant should also be aware of new Supplementary Planning Documents which may be relevant to the preparation of the application and the restoration and ecological enhancement proposals. The draft Upper Nene Valley Gravel Pits Special Protection Area SPD available on the [North Northamptonshire Joint Planning Unit website](#).

### **Other Environmental Impacts**

I would repeat the advice previously provided in the Authority's scoping response of 18.07.12 in relation to air quality and lighting and to the assessment of cumulative effects as well as LVIA, ecology and habitat restoration.

I am happy to provide further detail or to discuss the application and mitigation proposals with the applicant's Ecologist, Landscape Architect and Arboricultural consultant or other technical consultants as appropriate.

Tina Cuss  
Senior Environmental Planner



## Northamptonshire County Council

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### memo

To: Phil Watson  
From: Lesley-Ann Mather  
Ref: 15/00001/SCO  
Date: 31<sup>st</sup> December 2015  
cc:

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

**PROPOSED DEVELOPMENT: Great Billing Sand and Gravel Extraction and Restoration**  
**LOCATION: Land to the South of Lower Ecton Lane**

Phil

Thank you for your consultation regarding the proposals within the scoping report with regard to Cultural Heritage.

The proposals within the Scoping Report with regard to Section 7 Archaeology and Cultural Heritage identify that although non intrusive survey and a desk based assessment have been undertaken within the study area they are out of date and need to be revised. The current baseline information suggests a high potential for archaeology activity within the study area however this will need to be tested by intrusive works. In term of intrusive works I would expect the trial trenches to target the anomalies identified by the geophysical survey but also to test blank areas in order to provide an informed assessment of the archaeological potential to inform the assessment detailed in Section 7.7.2.

Section 7 covers the current state of knowledge with regard to the archaeological potential. It does not however propose that the results of non intrusive evaluation should be tested by trial trenching. I would expect the Environmental Statement to comprise of the results of both intrusive and non intrusive archaeological survey. The results of both techniques will lead to an informed understanding of the archaeological potential of the study area in line with the guidance within the NPPF Conserving and Enhancing the Historic Environment, Section 12 Paragraph 128.

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Northamptonshire  
County Council

I agree that it is important to initiate a dialogue with the County Archaeological Advisor with regard to the content of the Environmental Statement and I look forward to discussing the outstanding archaeological evaluation at the earliest opportunity.

Regards

A handwritten signature in black ink that reads "L Matthe". The signature is written in a cursive style with a checkmark at the end.

Lesley-Ann



# NORTHAMPTON BOROUGH COUNCIL

MR PHIL WATSON  
DEVELOPMENT CONTROL MANAGER  
NORTHANTS COUNTY COUNCIL  
PLANNING SERVICES  
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Our ref. N/2015/1420  
Your ref. 15/00001/SCO

Officer: Jonathan Moore  
email: [planning@northampton.gov.uk](mailto:planning@northampton.gov.uk)  
Telephone: 01604 838345

Date: 11 January 2016

Dear Mr Watson.

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

### **RE- GREAT BILLING SAND AND GRAVEL EXTRACTION RESTORATION LAND TO SOUTH OF LOWER ECTON LANE**

I refer to your letter of 19 December 2015 concerning the request for a Scoping Opinion in connection with the above and apologise for the delay in responding.

I wish to confirm that the Borough Council is generally satisfied with the proposed scope of the information to be provided. However we have the following comments to make:-

- In terms of Paragraphs 7.2.22 and 7.2.23 the list of visual receptors should include the residential area to the east and south of Ecton Brook Road and the Ecton Lane Travellers site. View points should also be included in these locations.
- Section 7.8 Air Quality including Dust- I would advise that there is a current planning application for 66 dwellings at Ecton Brook Playing Fields reference N/2015/1249.

I trust that the above is of assistance.

Yours faithfully,

*SP Boyes*

**Steven Boyes**  
Director – Regeneration, Enterprise & Planning

Mr Phil Watson  
Northamptonshire County Council  
County Hall Guildhall Road  
Northampton  
NN1 1DN

**Our ref:** AN/2016/123103/01-L01  
**Your ref:** 15.00001.SCO  
**Date:** 29 January 2016

Dear Mr Watson

**Request for scoping opinion: great billing sand and gravel extraction and restoration  
Land to the South of Lower Ecton Lane**

Thank you for consulting us on the scoping opinion above, on 14 January 2016.

**Environment Agency position**

The Scoping Report seems to confirm that the issues within our remit will be adequately addressed in a future Environmental Statement (ES). In particular, it acknowledges that a Flood Risk Assessment (FRA) is required. We would like to take this opportunity to present the following advice to the applicant, to inform the production of any future ES.

**Informative to the applicant - FRA advice**

Any FRA should consider all sources of flooding which may include tidal, fluvial, ground water, drainage systems, reservoirs, canals or ordinary watercourses. The local planning authority (LPA) will need to be satisfied that the proposed development is in accordance with all flood risk requirements of the National Planning Policy Framework (NPPF). The FRA should also demonstrate that flood risk to third parties will not be increased, and will be reduced where possible.

The FRA should contain evidence that appropriate mitigation measures, including flood resilience techniques, have been incorporated into the development where possible. Appropriate mitigation should be proposed, in response to the flood risk vulnerability of those that could occupy and use the development.

The FRA needs to consider the residual risk of flooding, and should demonstrate that the building and future users will be safe for the lifetime of the development. The FRA should fully detail the areas to be worked including any planned phasing of extraction, along with details of all ancillary features such as bunds, access roads, stockpiling areas and offices, as well as the final restoration proposals.

There should be no loss of floodplain as a result of the development (during operation and restoration) and the FRA should provide comprehensive details of any land raising or lowering, 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

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Cont/d..

development) therefore providing a direct replacement for the lost storage volume. Detailed information must be provided within the FRA which demonstrates how this can/will be achieved.

Detailed topographic plans should be submitted covering all scenarios (existing, during operation including phasing, and post restoration) with the modelled flood extents overlaying this information. We have modelled the watercourse at this location, and we strongly recommend that you obtain the modelled flood levels from us. This can be done by requesting a 'Product 3' from our Customers and Engagement Team at [L.Nenquiries@environment-agency.gov.uk](mailto:L.Nenquiries@environment-agency.gov.uk).

Finally, we have a standard stand-off distance of 30 metres (previously 100 feet) which needs to be provided excavations and Main Rivers. This is to ensure that river bank stability is not compromised. In certain circumstances, where it can be demonstrated that any working in the vicinity of rivers can be carried out without adversely affecting the stability of the river bank and the channel, this distance can be reduced. This must be included, either in the FRA or ES. Notwithstanding this, the 9.0m byelaw distance access strip must be maintained from all main rivers, as a minimum.

### **Informative to the applicant - Flood Defence Consent (Main Rivers)**

Under the terms of the Water Resources Act 1991, and the Land Drainage and Sea Defence Byelaw, the prior written consent of the Environment Agency is required for any proposed works or structures, in, under, over or within 9.0 metres of the top of the bank of Ecton Brook, Barton Brook and the River Nene, designated as 'Main Rivers'.

Please note this process is entirely independent of the planning process. The applicant should not assume that consent would be guaranteed, and we strongly recommend that you contact us at the earliest opportunity in order to discuss this matter further.

### **Informative to the applicant – Non Main Rivers**

Any works which may affect the flow of water, or culverting, of a non-main watercourse would require consent from the Lead Local Flood Authority (LLFA). In this instance, this would be the Bedford Group of Internal Drainage Boards (IDB) who would issue any consent on behalf of Northamptonshire County Council. We strongly recommend that you discuss any such proposals with them at the earliest opportunity. Any enquiries around this Section 23 Consent should be directed to the IDBs at [contact@idbs.org.uk](mailto:contact@idbs.org.uk). Alternatively, they can be contacted on 01234 767995.

### **Environmental Permit**

It is likely that an Environmental Permit would be required for any water discharges from this site. We strongly recommend that you contact our National Customer Contact Centre on 03708 506 506 to discuss this matter at the earliest opportunity, as they will be able to put you through to the correct team.

Yours sincerely

**Mr Rob Millbank**  
**Sustainable Places - Planning Adviser**

Direct dial 02030 255036

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

End

Date: 18 December 2015  
Our ref: 173967  
Your ref: 15/00001/SCO



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Northamptonshire County Council

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**BY EMAIL ONLY**

Dear Phil

**Environmental Impact Assessment Scoping consultation (Regulation 15 (3) (i) of the EIA Regulations 2011): Great Billing Sand and Gravel Extraction and Restoration**  
**Location:** Land To The South Of Lower Ecton Lane

Thank you for seeking our advice on the scope of the Environmental Statement (ES) in your consultation dated 09 December 2015.

Natural England is a non-departmental public body. Our statutory purpose is to ensure that the natural environment is conserved, enhanced, and managed for the benefit of present and future generations, thereby contributing to sustainable development.

Case law<sup>1</sup> and guidance<sup>2</sup> has stressed the need for a full set of environmental information to be available for consideration prior to a decision being taken on whether or not to grant planning permission. Annex A to this letter provides Natural England's advice on the scope of the Environmental Impact Assessment (EIA) for this development.

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.

We would be happy to comment further should the need arise but if in the meantime you have any queries please do not hesitate to contact us. For any queries relating to the specific advice in this letter only please contact Ross Holdgate on 0300 060 4657. For any new consultations, or to provide further information on this consultation please send your correspondences to [consultations@naturalengland.org.uk](mailto:consultations@naturalengland.org.uk).

Yours sincerely

Ross Holdgate  
Essex, Herts, Beds, Cambs and Northants Area Team

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<sup>1</sup> Harrison, J in *R. v. Cornwall County Council ex parte Hardy* (2001)

<sup>2</sup> *Note on Environmental Impact Assessment Directive for Local Planning Authorities* Office of the Deputy Prime Minister (April 2004) available from

<http://webarchive.nationalarchives.gov.uk/http://www.communities.gov.uk/planningandbuilding/planning/sustainability/environmental/environmentalimpactassessment/noteenvironmental/>





## Annex A – Advice related to EIA Scoping Requirements

### 1. General Principles

Schedule 4 of the Town & Country Planning (Environmental Impact Assessment) Regulations 2011, sets out the necessary information to assess impacts on the natural environment to be included in an ES, specifically:

- 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, in particular, population, fauna, flora, soil, water, air, climatic factors, material assets, including the architectural and archaeological heritage, 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 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.

It will be important for any assessment to consider the potential cumulative effects of this proposal, including all supporting infrastructure, with other similar proposals and a thorough assessment of the 'in combination' effects of the proposed development with any existing developments and current applications. A full consideration of the implications of the whole scheme should be included in the ES. All supporting infrastructure should be included within the assessment.

### 2. Biodiversity and Geology

#### 2.1 Ecological Aspects of an Environmental Statement

Natural England advises that the potential impact of the proposal upon features of nature conservation interest and opportunities for habitat creation/enhancement should be included within this assessment in accordance with appropriate guidance on such matters. Guidelines for Ecological Impact Assessment (EclA) have been developed by the Chartered Institute of Ecology and Environmental Management (CIEEM) and are available on their website.

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.

The National Planning Policy Framework sets out guidance in S.118 on how to take account of biodiversity interests in planning decisions and the framework that local authorities should provide to assist developers.

#### 2.2 Internationally and Nationally Designated Sites

The ES should thoroughly assess the potential for the proposal to affect designated sites. European sites (eg designated Special Areas of Conservation and Special Protection Areas) fall

within the scope of the Conservation of Habitats and Species Regulations 2010. In addition paragraph 118 of the National Planning Policy Framework requires that potential Special Protection Areas, possible Special Areas of Conservation, listed or proposed Ramsar sites, and any site identified as being necessary to compensate for adverse impacts on classified, potential or possible SPAs, SACs and Ramsar sites be treated in the same way as classified sites.

Under Regulation 61 of the Conservation of Habitats and Species Regulations 2010 an appropriate assessment needs to 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 or be uncertain, the competent authority (in this case the Local Planning Authority) may need to prepare an Appropriate Assessment, in addition to consideration of impacts through the EIA process.

### **Sites of Special Scientific Interest (SSSIs) and sites of European or international importance (Special Areas of Conservation, Special Protection Areas and Ramsar sites)**

The development site is in close proximity to the following designated nature conservation site:

- Upper Nene Valley Gravel Pits SSSI, SPA and Ramsar Site
- Further information on the SSSI and its special interest features can be found at [www.magic.gov](http://www.magic.gov). The Environmental Statement should include a full assessment of the direct and indirect effects of the development on the features of special interest within this site and should identify such mitigation measures as may be required in order to avoid, minimise or reduce any adverse significant effects.
- Natura 2000 network site conservation objectives are available on our internet site <http://publications.naturalengland.org.uk/category/6490068894089216>

### **2.3 Regionally and Locally Important Sites**

The EIA will need to consider any impacts upon local wildlife and geological sites. Local Sites are identified by the local wildlife trust, geoconservation group or a local forum established for the purposes of identifying and selecting local sites. They are of county importance for wildlife or geodiversity. The Environmental Statement should therefore include an assessment of the likely impacts on the wildlife and geodiversity interests of such sites. The assessment should include proposals for mitigation of any impacts and if appropriate, compensation measures. Contact the local wildlife trust, geoconservation group or local sites body in this area for further information.

### **2.4 Protected Species - Species protected by the Wildlife and Countryside Act 1981 (as amended) and by the Conservation of Habitats and Species Regulations 2010**

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, but advises on the procedures and legislation relevant to such species. Records of protected species should be sought from appropriate local biological record centres, nature conservation organisations, groups and individuals; and 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, to assist in the impact assessment.

The conservation of species protected by law 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 area likely to be affected by the proposal 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.

In order to provide this information there may be a requirement for a survey at a particular time of year. 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 links to guidance on survey and mitigation.

## 2.5 Habitats and Species of Principal Importance

The ES should thoroughly assess the impact of the proposals on habitats and/or species listed as 'Habitats and Species of Principal Importance' within the England Biodiversity List, published under the requirements of S41 of the Natural Environment and Rural Communities (NERC) Act 2006. Section 40 of the NERC Act 2006 places a general duty on all public authorities, including local planning authorities, to conserve and enhance biodiversity. Further information on this duty is available in the Defra publication '[Guidance for Local Authorities on Implementing the Biodiversity Duty](#)'.

Government Circular 06/2005 states that Biodiversity Action Plan (BAP) species and habitats, 'are capable of being a material consideration...in the making of planning decisions'. Natural England therefore advises that survey, impact assessment and mitigation proposals for Habitats and Species of Principal Importance should be included in the ES. Consideration should also be given to those species and habitats included in the relevant Local BAP.

Natural England advises that a habitat survey (equivalent to Phase 2) is carried out on the site, in order 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 (eg from previous surveys);
- Additional surveys carried out as part of this proposal;
- The habitats and species present;
- The status of these habitats and species (eg 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 that might be required.

The development should seek if possible to avoid adverse impact on sensitive areas for wildlife within the site, and if possible provide opportunities for overall wildlife gain.

The record centre for the relevant Local Authorities should be able to provide the relevant information on the location and type of priority habitat for the area under consideration.

## 2.6 Contacts for Local Records

Natural England does not hold local information on local sites, local landscape character and local or national biodiversity priority habitats and species. We recommend that you seek further information from the appropriate bodies (which may include the local records centre, the local wildlife trust, local geoconservation group or other recording society and a local landscape characterisation document).

## 3. Designated Landscapes and Landscape Character

### Landscape and visual impacts

Natural England would wish to see details of local landscape character areas mapped at a scale appropriate to the development site as well as any relevant management plans or strategies pertaining to the area. The EIA should include assessments of visual effects on the surrounding area and landscape together with any physical effects of the development, such as changes in topography. The European Landscape Convention places a duty on Local Planning Authorities to

consider the impacts of landscape when exercising their functions.

The EIA 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, as detailed proposals are developed.

Natural England supports the publication *Guidelines for Landscape and Visual Impact Assessment*, produced by the Landscape Institute and the Institute of Environmental Assessment and Management in 2013 (3rd edition). The methodology set out is almost universally used for landscape and visual impact assessment.

In order to foster high quality development that respects, maintains, or enhances, local landscape character and distinctiveness, Natural England encourages all new development to consider the character and distinctiveness of the area, with the siting and design of the proposed development reflecting local design characteristics and, wherever possible, using local materials. The Environmental Impact Assessment process should detail the measures to be taken to ensure the building design will be of a high standard, as well as detail of layout alternatives together with justification of the selected option in terms of landscape impact and benefit.

The assessment should also include the cumulative effect of the development with other relevant existing or proposed developments in the area. In this context Natural England advises that the cumulative impact assessment should include other proposals currently at Scoping stage. Due to the overlapping timescale of their progress through the planning system, cumulative impact of the proposed development with those proposals currently at Scoping stage would be likely to be a material consideration at the time of determination of the planning application.

The assessment should refer to the relevant [National Character Areas](#) which can be found on our website. Links for Landscape Character Assessment at a local level are also available on the same page.

### **Heritage Landscapes**

You should consider whether there is 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 may be obtained at [www.hmrc.gov.uk/heritage/lbsearch.htm](http://www.hmrc.gov.uk/heritage/lbsearch.htm) and further information can be found on Natural England's landscape pages [here](#).

## **4. Access and Recreation**

Natural England encourages any proposal to incorporate measures to help encourage people to access the countryside for quiet enjoyment. Measures such as reinstating existing footpaths together with the creation of new footpaths and bridleways are to be encouraged. Links to other green networks and, where appropriate, urban fringe areas should also be explored to help promote the creation of wider green infrastructure. Relevant aspects of local authority green infrastructure strategies should be incorporated where appropriate.

### **Rights of Way, Access land, Coastal access and National Trails**

The EIA should consider potential impacts on access land, public open land, rights of way and coastal access routes in the vicinity of the development. We also recommend reference to the relevant Right of Way Improvement Plans (ROWIP) to identify public rights of way within or adjacent to the proposed site that should be maintained or enhanced.

## **5. Soil and Agricultural Land Quality**

Impacts from the development should be considered in light of the Government's policy for the protection of the best and most versatile (BMV) agricultural land as set out in paragraph 112 of the NPPF. We also recommend that soils should be considered under a more general heading of sustainable use of land and the ecosystem services they provide as a natural resource in line with paragraph 109 of the NPPF. We note the intention to scope soil and agricultural land out of the ES and Natural England does not agree with this suggestion. The majority of the site is currently in agricultural use and, even given the agriculturally focused restoration, there could be significant impacts to land quality if this issue is not given detailed consideration through the planning application.

Soil is a finite resource that fulfils many important functions and services (ecosystem services) for society, for example as a growing medium for food, timber and other crops, as a store for carbon and water, as a reservoir of biodiversity and as a buffer against pollution. It is therefore important that the soil resources are protected and used sustainably.

The applicant should consider the following issues as part of the Environmental Statement:

- 1 The degree to which soils are going to be disturbed/harmed as part of this development and whether 'best and most versatile' agricultural land is involved.

This may require a detailed survey if one is not already available. For further information on the availability of existing agricultural land classification (ALC) information see [www.magic.gov.uk](http://www.magic.gov.uk). Natural England Technical Information Note 049 - [Agricultural Land Classification: protecting the best and most versatile agricultural land](#) also contains useful background information.

- 2 If required, an agricultural land classification and soil survey of the land should be undertaken. This should normally be at a detailed level, eg 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, ie 1.2 metres.
- 3 The Environmental Statement should provided details of how any adverse impacts on soils can be minimised. Further guidance is contained in the [Defra Construction Code of Practice for the Sustainable Use of Soil on Development Sites](#).

## 6. Air Quality

Air quality in the UK has improved over recent decades but air pollution remains a significant issue; for example over 97% of sensitive habitat area in England is predicted to exceed the critical loads for ecosystem protection from atmospheric nitrogen deposition ([England Biodiversity Strategy](#), Defra 2011). A priority action in the England Biodiversity Strategy is to reduce air pollution impacts on biodiversity. 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 assessment should take account of the risks of air pollution and how these can be managed or reduced. 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](http://www.apis.ac.uk)). Further information on air pollution modelling and assessment can be found on the Environment Agency website.

## 7. Climate Change Adaptation

The [England Biodiversity Strategy](#) published by Defra establishes principles for the consideration of biodiversity and the effects of climate change. The ES should reflect these principles and identify how the development's effects on the natural environment will be influenced by climate change, and how ecological networks will be maintained. The NPPF requires that the planning system should contribute to the enhancement of the natural environment 'by establishing coherent ecological networks that are more resilient to current and future pressures' ([NPPF](#) Para 109), which should be demonstrated through the ES.

## **8. Contribution to local environmental initiatives and priorities**

The site falls within the Nene Valley Nature Improvement Area which is a nationally recognised priority area for restoring biodiversity. There is strong potential for the site to contribute to the success of the NIA project through the restoration. Natural England welcomes the intention for habitat creation in the south of the restored area and we would highlight the benefits of a restoration strategy which coordinates with restoration of the adjacent mineral site to the east. The majority of the site is proposed for restoration to agriculture and whilst Natural England is supportive of this we would encourage the applicants to consider how this can contribute to conservation, e.g. through inclusion of species rich meadows subject to low intensity management.

## **9. Cumulative and in-combination effects**

A full consideration of the implications of the whole scheme should be included in the ES. All supporting infrastructure should be included within the assessment.

The ES should include an impact assessment to 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, ie 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.

Our ref:  
Your ref: 15/00001/SCO

Northamptonshire County Council  
Planning Services, Floor 3  
Guildhall Road Block  
County Hall  
Northampton  
NN1 1DN

Martin Seldon  
Asset Manager  
Floor 9  
The Cube  
199 Wharfside Street  
Birmingham B1 1RN

Direct Line: 0121 687 2585

22 December 2015

**For the attention of Phil Watson**

Dear Phil

## **GREAT BILLING SAND AND GRAVEL EXTRACTION AND RESTORATION**

Thank you for consulting Highways England on the above Scoping Request concerning sand and gravel extraction and restoration at Land to the South of Lower Ecton Lane.

I have set out below both the general and specific areas of concern that Highways England would wish to see considered as part of an Environmental Statement. The comments relate specifically to matters arising from Highways England's responsibilities to manage and maintain the strategic road network (SRN) in England.

I note that a Transport Assessment is to be prepared with reference to *Circular 2/2013 Planning and the Strategic Road Network*. Further clarity should be provided on the opening year of the development, in line with the requirements of the Circular. I also note that an assessment of transport related impacts of the proposal on the A45/A5076 junction is to be undertaken which I welcome.

Trip calculations for staff should be carried out separately from HGVs to help clarify the type and spread of traffic movements over the course of the day. This should also allow consideration of origin and destination information to help estimate HGV distribution to and from the site. The hours of operation including staff shift patterns must be detailed in order to help us make an informed decision about the likely impact on the SRN and what trips may occur during traditional peak hours. This is particularly pertinent as some of the junctions along the A45 are operating close to or at capacity in the peak hours.

I also note that the north east corner of the site directly abuts the highway boundary of the A45.

It is stated within the scoping report that a Flood Risk Assessment will include a chapter which addresses surface water runoff management. The applicant should be made aware of the following extract from DfT Circular 02/2013:

*In order to ensure the integrity of the highway drainage systems, no water run off that may arise due to any change of use will be accepted into the highway drainage systems, and there shall be no new connections into those systems from third party development and drainage systems. Where there is already an existing third party connection the right for connection may be allowed to continue provided that the input of the contributing catchment to the connection remains unaltered.*

Whilst detailed plans of the works have not been provided, I note that works are proposed in close proximity to the A45 trunk road. The applicant should refer to *HD22/08 Managing Geotechnical Risk*, in relation to any excavation/geotechnical works in close proximity to the trunk road boundary.

Environmental impact arising from any disruption during construction, traffic volume, composition or routing change and transport infrastructure modification should be fully assessed and reported.

Adverse change to noise and air quality should be particularly considered, including in relation to compliance with the European air quality limit values and/or in local authority designated Air Quality Management Areas (AQMAs)

I trust this is helpful but please do not hesitate to contact me for clarification.

Yours sincerely



Martin Seldon  
NDD Midlands Asset Development Team  
Email: [Martin.Seldon@highways.gsi.gov.uk](mailto:Martin.Seldon@highways.gsi.gov.uk)



## Vicky Benham

---

**From:** Ginns, Kerrie <kerrie.ginns@environment-agency.gov.uk>  
**Sent:** 28 June 2012 15:32  
**To:** Mark Laurenson  
**Subject:** 12/00002/SCO - Land Adjacent A45 Nene Valley Way, Ecton, Wellingborough, Northamptonshire  
**Attachments:** AN.2012.114880.01 ea response 28.06.2012.pdf

Dear Sir

Please find attached a copy of the Environment Agency's response to the above.

If I can be of any further assistance please do not hesitate to contact me on the number below.

Kerrie Ginns

Kerrie Ginns | Planning Liaison Officer | Environment Agency | Anglian Region

Nene House, Pytchley Lodge Road, Kettering, Northamptonshire, NN15 6JQ  
Tel: 01536 385 159 | Fax: 01536 411 354 | Int: 750 5159

National Customer Contact Centre: 03708 506 506

(Calls to 03 numbers cost no more than national rate calls to 01 or 02 numbers and count towards any inclusive minutes in the same way. This applies to calls from any type of line including mobile)



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## **Vicky Benham**

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**From:** Natasha Stanley <nstanley@northampton.gov.uk>  
**Sent:** 16 December 2015 09:42  
**To:** Phil Watson  
**Cc:** Catherine Somerville (CSomerville@wellingborough.gov.uk)  
**Subject:** 15/00001/SCO

### **F.A.O Phil Watson**

Thank you for consulting us on the scoping opinion for the Land at lower Ecton Lane.

We have had a brief look at the scoping opinion and the proposals for inclusion in the Environmental Impact Assessment.

We would make the following general comments:

### **Odour**

We note that odour has been scoped out of inclusion in the EIA. We note that previously the land was used as a sewage farm, and some land was used as a sewage irrigation area. We would expect that it could be likely that odour will arise when such impacted soils are disturbed and moved onsite. We would like to ensure that this is considered and assessed as part of the EIA

### **Transportation and Access**

We are pleased to see that there are no plans to use the Lower Ecton Lane Junction for access to the site as this would put vehicles accessing and egressing the site in close proximity to the Residential Caravan Site creating unacceptable impacts. As we understand the current plan is to use the main Sewage works access on Crow Lane for this site.

### **Noise**

We are in broad agreement with the plans for assessing noise. Any noise management plan will need to clearly quantify and assess all site and process noise. Vehicle reversing sirens used should be of the broadband noise variety to limit offsite impact.

### **Air Quality / Dust**

We are in broad agreement with the methodology for assessing air quality and dust impacts. Dust and risks from dusts on the land used previously for sewage irrigation should be fully risk assessed as part of the land contamination assessment as well.

Best regards

*Natasha Stanley  
Senior Environmental Health Officer  
Northampton Borough Council  
Tel: 01604 837772 dd*

*The Guildhall,  
St Giles Square  
Northampton  
NN1 1DE  
Tel: (01604) 837648; Main Switchboard: 0300 330 7000; Fax: (01604) 838755*



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## Vicky Benham

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**From:** Development Control <DevelopmentControl@northamptonshire.gov.uk>  
**Sent:** 23 December 2015 09:07  
**To:** Phil Watson  
**Subject:** FW: 15.00001.SCO Great Billing Sand and Gravel Extraction and Restoration

FYA

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**From:** Surface Water Drainage Assessment Team  
**Sent:** 22 December 2015 16:16  
**To:** Development Control  
**Subject:** RE: 15.00001.SCO Great Billing Sand and Gravel Extraction and Restoration

Dear Phil,

Thank you for consulting us to request a Scoping Opinion for the above planning application.

National Planning Policy Framework (NPPF) Paragraph 103 requires applicants for planning permission to submit a Flood Risk Assessment (FRA) when development is greater than one hectare. In addition, all Major applications are now required to be assessed for their impact on surface water drainage. For an EIA application, the Environmental Statement should fully consider the impact of the development on surface water.

Full details of what we would require to see in terms of surface water drainage assessment, can be found within our developer guidance which is on our web page at <http://www.floodtoolkit.com/planning/surface-water-drainage/>

Hope the above is helpful. Please do not hesitate to contact us should you have any queries with regards to the above.

Kind Regards,

Pankit Shah  
Principal Project Engineer

### Surface Water Drainage Assessment Team

Phone: 01604 364306  
Email: [swdrainage@northamptonshire.gov.uk](mailto:swdrainage@northamptonshire.gov.uk)  
Web: [www.floodtoolkit.com](http://www.floodtoolkit.com)



The banner features the Northamptonshire County Council logo on the left, which includes a stylized flower icon. To the right of the logo, the text reads "Northamptonshire County Council" and "Flood Toolkit". A large, light blue speech bubble contains the text "Visit our online Flood Toolkit at" followed by the URL "[www.floodtoolkit.com](http://www.floodtoolkit.com)". Below the speech bubble, a dark blue navigation bar contains several menu items: "Home", "Am I at risk?", "It's an emergency", "Who is responsible?", "How to guides", and "Plan". The word "Your" is partially visible on the right side of the banner.

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**From:** Development Control

**Sent:** 09 December 2015 12:12

**Subject:** 15.00001.SCO Great Billing Sand and Gravel Extraction and Restoration

Please find attached consultation letter relating to the above application

Regards

Development Control

Environment & Planning

Floor 3

Guildhall Road Block

County Hall

NN1 1DN

01604 366833

Working hours 9 - 4pm Monday - Thursday