Heatons

Planning Environment Design

REQUEST FOR SCOPING OPINION

at

Cauldon and Caldon Low Quarries, Staffordshire

Prepared By

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1 Introduction & Background

1.1 Introduction

1.1.1 This report has been prepared on behalf of our client, Aggregate Industries UK Ltd (hereafter referred to as the Company), to seek Staffordshire County Council's (SCC's) formal Scoping Opinion on the scope of an Environmental Impact Assessment (EIA) associated with a planning application which is in preparation relating to mineral extraction and processing operations carried out across the Cauldon / Caldon Low Complex (the site).

1.1.2 The application in preparation proposes a consolidation of existing permissions for the site, the latest Periodic Review as part of the Cauldon Quarry Review of Old Mineral Permissions (ROMP), the working of currently unpermitted mineral reserves, and an increase in annual limestone output.

1.1.3 To assist SCC in arriving at a considered view, this Request for a Scoping Opinion provides details of the site and a broad description of the proposed future operations across the mineral site. This report also contains a broad assessment of any potential likely environmental effects and their significance. In addition, other considerations material to the preparation and determination of a planning application are also set out below.

1.1.4 The overall objective of this report is to enable the mineral operator to prepare an acceptable and informed consolidating planning application including ROMP Periodic Review in order to satisfy SCC following acceptable applications submitted under Schedule 14 of the Environment Act 1995 which postponed the review date for planning permissions:

- IDO/SM/6 and IDO/SM/9 (SCC ref. SM.19/05/111 MW)
- IDO/SM/3, IDO/SM/8 and SM.EA/2.

1.1.5 It is proposed to submit the application to the mineral planning authority upon receipt of a Scoping Opinion from SCC once the technical studies and supporting information have been prepared and collated.

1.2 Site Background and Operators

1.2.1 The site consists of Caldon Low and Cauldon limestone quarries and Cauldon shale quarry. The application boundary also incorporates Caldon Low Asphalt Plant, various other associated mineral processing infrastructure and structures including primary crusher, and areas of active extraction, worked (restored) areas, yet-to-be-worked consented reserves, and unconsented resources.

1.2.2 Limestone and shale extraction across the site has taken place for many decades, with early planning permissions for mineral extraction issued as Interim Development Orders (IDOs) in the years following the Second World War.

1.2.3 The accompanying Mineral Planning Permissions Plan (Drawing No. UKTD-CL201) shows the extent of the many planning permissions which together comprise the extant permissions for the site. An objective of this submission is to facilitate the consolidation of planning permissions for the site in order to provide for a comprehensive scheme of working under one planning consent.

1.2.4 The site today is a significant and established visual feature in an area which is otherwise made up predominantly of land used for grazing as well as operational and restored quarry workings, many of which have regenerated naturally and have become the focus of attention for wildlife interests and recreation.

1.2.5 The majority of the limestone and shale from the Cauldon limestone and shale quarries are used at the adjacent Cement Plant in the manufacture of cement. The remainder, along with the generally lower-purity limestone won at Caldon Low limestone quarry, is exported from the site to market by road for aggregate purposes.

1.2.6 Caldon Low Quarry is operated by Aggregate Industries whereas it is Lafarge Cement who operate the Cauldon limestone and shale quarries and the Cement Plant. Both Aggregate Industries and Lafarge Cement are part of the wider LafargeHolcim group.

1.3 Site Location

1.3.1 The site is located in the Staffordshire Moorlands countryside beyond any settlement boundaries but with nearby connections to the A523 and the A52. The site is close to the southern boundary of the Peak District National Park.

1.3.2 The closest settlements to the site are the villages of Cauldon and Waterhouses. The site covers a significant area across the Parishes of Waterhouses and Cotton and adjoins Wootton Parish.

1.3.3 There are no formal landscape designations on the site. However, the site does contain ecological and designated assets of heritage value including Cauldon Railway Cutting SSSI, Caldon Dales SSSI, Caldon Low SSSI, Rue Hill SSSI, Milk Hill tumulus Scheduled Ancient Monument, as well as Listed Buildings at Orchard Farm, Shaw's Farm and the Church Farmhouse and Cauldon village. In addition, the SSSI Impact Risk Zones of off-site SSSIs encroach into the site area. The site operations must also consider the potential for impact on the setting and enjoyment of the Peak District National Park.

1.3.4 A number of Public Rights of Way cross the site.

1.3.5 In terms of flood risk, the vast majority of the site is located within EA Flood Zone 1 (comprising land at lowest risk of flooding from fluvial sources). However, areas of the site immediately parallel to the course of the River Hamps are within EA Flood Zones 2 and 3.

2 Current Situation

2.1 Limestone Extraction

2.1.1 At present, approximately 1.1 million tonnes (mt) of limestone is extracted by Lafarge Cement at Cauldon limestone Quarry. All of the limestone extracted is processed through the quarry's primary and secondary crusher with the crushed rock transferred via conveyor to the Cement Plant. No material leaves the quarry by road.

2.1.2 At Caldon Low Quarry, output of limestone for 2020 is expected to be 1 mt. Of this total figure, 25% to 30% consists of scalpings. The saleable limestone extracted at Caldon Low by Aggregate Industries is processed using mobile plant and sold to the aggregate market by road. Some scalpings from Caldon Low are transferred to the adjoining Cauldon Quarry for use in the cement manufacturing process.

2.2 Shale Extraction

2.2.1 Shale extraction is currently carried out on a campaign basis at Cauldon Shale Quarry. Output from the Cauldon shale quarry is approximately 0.2mtpa, with circa 11 years of permitted reserves remaining.

2.2.2 Shale won at the site is used directly in the production of cement at Cauldon Cement Plant. The mineral is transported to the Plant via conveyor.

3 Description of Proposed Development

3.1 Proposed Working and Tonnages

3.1.1 The overall site contains an estimated 206 million tonnes (mt) of unworked limestone resources and 5.6mt of unworked shale resources at the time of writing (2.2mt permitted shale reserves).

3.1.2 The objective of the planning application is to allow for extensions to the Cauldon shale quarry, working of the 'spine' landform between Caldon Low and Cauldon limestone quarries, and the overall consolidation of the many extant permissions across the site into one consolidating planning permission. The proposal would enable the mineral planning authority to impose up-to-date planning conditions across the site in order to maintain the site's current and future environmental acceptability.

3.1.3 It is proposed to increase the combined production of the site from its current rate of approximately 2.1mt limestone per annum to 3.0mt limestone per annum. Of this, approximately 1mt per annum (mtpa) would continue to be used directly for cement production at the adjacent Plant and would not generate any exporting HGV movements.

3.1.4 The proposed extension to the shale quarry could yield up to 3.4mt of shale reserves.

3.1.5 No modifications are proposed to the access to any of the site from the public highway.

3.1.6 Working hours across the site are not proposed to be amended.

3.1.7 HGV movements associated with the mineral operations would increase as a result of higher output from the site.

3.1.8 The asphalt plant (currently operated by Tarmac) would remain within Caldon Low Quarry as existing.

3.2 Proposed Phasing and Depth of Working

3.2.1 The accompanying plans show the extent of proposed mineral extraction, including the shale quarry extension area and worked 'spine'. The plans also show the proposed phasing of mineral extraction, which is summarised below. However, it should be borne in mind that given the duration of mineral extraction required in order to work all viable reserves at acceptable tonnages per annum, the details of the latter stages of mineral operations will be subject to numerous further reviews in years to come. As such, the phasing scheme aims to provide a degree of flexibility relating to future production.

Phase 1: 18mt limestone (c. present – 2028)

As shown on *Phase 1 - Limestone – Drawing No. AI-044-M.D.006*

3.2.2 The development extends the upper faces to their final southern limit with the creation of rollover slopes at 1v in 2.5h (22°). With the exception of working Milk Hill (labelled for clarity on the accompanying plans) which is not proposed until the final phase of working (Phase 5), all areas of SSSI within the extraction area are relocated during this phase. Within Cauldon Quarry the SSSI will be moved onto the rollover slopes in accordance with the approved scheme and within Caldon Low onto 'School House Tip' (also labelled on the accompanying plans).

3.2.3 Deepening operations will take place above the current anticipated maximum water level, with separate trial deepening to 215m AOD.

3.2.4 Extraction of the spine in the north and central area to the permitted boundary and working level, is already planned at Caldon Low for the period up to 2021. This will gradually open up views into the quarry.

3.2.5 Rollover restoration will continue to the upper southern faces of Cauldon limestone and Caldon Low Quarries to ensure a consistent and integrated landform along the site's southern boundary.

3.2.6 Progressive restoration along the upper southern benches and faces will follow the direction of limestone extraction.

3.2.7 Shale will continue to be worked at a rate of 0.2mtpa within the existing footprint.

Phase 2: 20mt limestone (c.2028 – 2034)

As shown on *Phase 2 - Limestone – Drawing No. AI-044-M.D.007*

3.2.8 Phase 2 sees the continued development of upper faces to their southern limits. The spine area is reduced in height by c. 10m opening views of existing quarry faces and restored tip areas in the west. This Phase sees mineral extraction towards the south-east at Caldon Low and generally southwards at Cauldon limestone Quarry.

3.2.9 With the exception of the approved trial deepening to the 215m AOD level all working areas are above the anticipated maximum water level.

3.2.10 Rollover restoration will continue to the upper southern faces of Cauldon limestone and Caldon Low Quarries to ensure a consistent and integrated landform along the site's southern boundary.

Phase 3: 18mt limestone (c.2034 – 2040)

As shown on *Phase 3 - Limestone – Drawing No. AI-044-M.D.008*

3.2.11 Phase 3 is generally a continuation of Phase 2 extraction and progressive restoration, with the continued development of upper faces at Caldon Low and Cauldon limestone Quarry to their southern limits. The spine area is reduced in height by a further c. 23m effectively to the quarry floor level in Caldon Low.

3.2.12 With the exception of the approved trial deepening to the 215m AOD level and the south-west corner of the 225 level all working areas are above the anticipated maximum water level.

3.2.13 Further progressive restoration to form appropriate rollover slopes will take place across the upper southern faces of the limestone quarries.

3.2.14 Shale extraction will progress northwards at a rate of 0.2mtpa.

Phase 4: 54mt limestone (c.2040 – 2058)

As shown on *Phase 4 - Limestone – Drawing No. AI-044-M.D.009*

3.2.15 The timescales for Phases 4 and 5 are significant and have been designed to retain a degree of flexibility. This is considered appropriate given that further Periodic Reviews of the site will be carried out prior to the commencement of Phase 4

operations. The principles of Phases 4 and 5 are shown on the accompanying set of phasing plans.

3.2.16 It is proposed that Phase 4 includes the pushing of quarry faces to their final southern limits except the 215m AOD level. The western parcel of Caldon Low Quarry is left for mineral processing, stockpiling, the Asphalt Plant on the quarry floor level. At Cauldon, mineral extraction is to progress north-east into greenfield land (within Cauldon Quarry's current permission area) leaving the adjacent SSSI and Milk Hill further to the east undisturbed.

3.2.17 Some dewatering in winter may be required to fully exploit faces below the 235m AOD level in the south.

3.2.18 In terms of restoration of the limestone quarries, which by now effectively forms a large single void, rollover slopes are continued to be formed on the southern and eastern faces and benches.

3.2.19 Shale extraction will progress northwards at a rate of 0.2mtpa.

Phase 5: 96mt limestone (c.2058 – 2090)

As shown on *Phase 10 - Limestone – Drawing No. AI-044-M.D.0010*

3.2.20 Finally, Phase 5 of mineral operations involves the working of limestone reserves down to 215m AOD level across Caldon Low and Cauldon limestone Quarries to form a large void that includes the western areas of Caldon Low which currently house the Asphalt Plant and the Milk Hill extension area (the final phase of mineral extraction).

3.2.21 Dewatering by up to 20m in the south during winter may be required in order to enable full extraction and non-sterilisation of limestone reserves.

3.2.22 Given the volume of limestone to be won within Phases 4 and 5, much greater detail will be provided through future reviews of the site' mineral operations across the site closer to the estimated start of Phases 4 and 5 of 2040 and 2058 respectively.

3.2.23 Rollover slopes are continued to be formed along the void edges at the limits of mineral extraction. Beyond Phase 5, the concept restoration of the site is to be delivered. This involves the creation of a large restoration waterbody with proposed new native woodland, species rich grassland and other grassland habitat alongside

areas dedicated to natural regeneration and areas which will feature retained quarry faces.

3.2.24 Shale will continue to progress northwards with progressive restoration behind.

Summary

3.2.25 In summary, the tonnages for each of the proposed working phases across the limestone quarries are provided below (including scalpings). The duration of each phase of mineral extraction listed below is based on an output of 2.1mt per annum (mtpa).

Phase	Mineral (million tonnes)	Duration (@ 2.1mtpa)
1	18	6 years
2	20	6.5 years
3	18	6 years
4	54	18 years
5	96	32 years
TOTAL	**206**	**68.5 years**

3.3 Proposed Restoration

3.3.1 Ongoing restoration includes the creation of rollover slopes which soften the quarry's visual impact, the SSSI grassland translocation within the site, and other measures to provide improvements to biodiversity throughout the life of mineral operations.

3.3.2 The accompanying Concept Restoration Plan (Drawing No. AI-044-M.D.011) shows the proposed concept restoration for the site.

3.3.3 The overall Concept Restoration scheme provides an indication of the restoration proposals, to be supplemented by more detailed and better-informed information as mineral extraction within the site progresses. The Concept Restoration shows the limestone void restored to a large waterbody with surrounding grassland, species rich grassland, new woodland, woodland block, areas to regenerate naturally and retained quarry faces. The shale quarry is to be restored to species rich grassland.

3.3.4 Given the proposed duration of mineral operations across the Caldon Low / Cauldon limestone quarry, it is apparent that should the proposed working of the 'spine' be

granted planning permission, further Periodic Review will be required through ROMP legislation before there exists a reasonable opportunity to fully restore the site.

3.3.5 Therefore, it is expected that a comprehensive detailed restoration and aftercare scheme will be submitted for approval in the future. At this stage, an overall concept restoration scheme showing appropriate restoration of the different elements of the site will be provided, along with details of areas already restored and updated details of the ongoing restoration taking place.

3.4 Plans/Drawings

3.4.1 We propose that in order to effectively illustrate the details of the development at the site, a series of Plans be submitted to SCC, consisting of:

- Location Plan showing the full extent of the site subject to the Periodic Review and subject of the planning application, and all other land in the vicinity of the site under the control of the operator;
- Local Designations Plan showing designated sites and features potentially impacted upon by site operations;
- Current Situation Plan;
- Proposals Plan (with overview of phasing of extraction)
- Plans showing working and restoration proposals for each phase of operations;
- Concept Restoration Plan showing a comprehensive scheme for the appropriate restoration of the site; and
- Concept Restoration Sections.

4 The Environmental Impact Assessment Regulations

4.1.1 The need for an Environmental Assessment is considered under the terms of the Town and Country Planning (Environmental Impact Assessment) Regulations 2017.

4.1.2 The proposed development would fall within Category 2a (extractive industry) of Schedule 2 of the Environmental Impact Assessment Regulations 2017. Category 2a defines all quarries to be caught by the thresholds and require Environmental Impact Assessment.

4.1.3 The Practice Guidance for Environmental Impact Assessment (last updated March 2019) provides guidance on screening Schedule 2 development. Paragraph: 017 Reference ID: 4-017-20170728 sets out that if the project is listed in Schedule 2, the Local Planning Authority should consider whether it is likely to have significant effects on the environment. Paragraph 018 sets out that this means taking account of the selection criteria in Schedule 3 – the characteristics of the development, its location and the types and characteristics of any potential impact.

4.1.4 As the development proposed to take place across the site until the Periodic Review is due consists of EIA development, SCC is requested to consider Part 4, Paragraph 15 to provide guidance on the Scope of the information to be provided in the Environmental Statement to be submitted to SCC prior to 31st December 2021.

4.1.5 To assist you in the formulation of the Scoping Opinion, the following sections provide a broad outline of potential environmental effects and the proposed technical considerations/assessment that will accompany the planning application. Consideration is also given to the potential benefits and other relevant considerations.

5 Potential Effects and Benefits on the Environment

5.1.1 Potential effects on the environment that could result from the proposed development are as follows:

- Landscape and Visual effects;
- Ecology and Nature Conservation effects;
- Noise effects;
- Air Quality and Dust effects;
- Impact on the Water Environment;
- Effects of Traffic;
- Archaeology/Cultural Heritage effects; and
- Impact on Soils and Agricultural land.

5.1.2 The following environmental considerations and/or assessment are proposed as part of the preparation and submission of a Planning Application.

5.2 Landscape and Visual Considerations

5.2.1 The site is located within an area designated as a Special Landscape Area in the Staffordshire Moorlands Local Plan. The setting of the site allows views to distant skylines. However, quarrying has been a feature of this area from the 17th century onwards, with the immediate area of the site heavily influenced by large-scale mineral operations.

5.2.2 A Landscape and Visual Impact Assessment (LVIA) will be undertaken and will include mitigation and enhancement proposals in accordance with:

- Guidelines for Landscape and Visual Impact Assessment published by The Landscape Institute and the Institute of Environmental Management and Assessment Third Edition (2013);
- Landscape Character Guidance for England and Scotland (LCA) published by the Countryside Agency and Scottish National Heritage (2002); and
- Staffordshire County Council - 'Planning for Landscape Change' Supplementary Planning Guidance.

5.2.3 Landscape assessment works will include baseline and development assessment of the Landscape Character and Quality, Sensitivity and Capacity to integrate and absorb the ongoing and proposed development activities. Works will also involve the consideration of individual Visual Receptors and Zones of Visual Influence associated with the scheme, with assessment taking place both in terms of potential zones and individual receptors. An analysis of the proposal's accordance with landscape-orientated policies will also be carried out with mitigation and enhancement measures in respect of landscape and visual aspects proposed where required.

5.2.4 Consideration will be given to the potential for visual impacts on nearby residential receptors, users of Public Rights of Way, and other relevant receptors. The LVIA may also consider the potential for the proposals to impact upon the setting of heritage assets and historic landscape character.

5.3 Ecology & Nature Conservation

5.3.1 The site contains a number of ecologically sensitive habitats and SSSIs (including those designated for the value of their grassland).

5.3.2 An assessment of the potential ecological impact of the proposed development area would be undertaken which would reflect the guidelines produced by IEEM "Guidelines for Ecological Impact Assessment". The assessment will be carried out in the form of an Ecological Appraisal, comprising a desk-based survey broadly outlining ecological designations. Further to this, a Phase 1 Habitat survey will be conducted. This will be used to identify the level of ecological and nature conservation value of the site currently and the potential for/presence of protected species which may be affected by the development.

5.3.3 Alongside a planning application, a factual report will be produced comprising a site description, the methodologies used, the desk study results and the results of the extended Phase 1 habitat survey including a map of habitats and target notes. The report will include an interpretation of the information collected from the site with regard to the relevant wildlife legislation, policy and guidance.

5.3.4 Based upon the findings of this assessment work, if required, recommendations will be made on the need for further assessment/survey work to be carried out (at an appropriate time of year). If necessary, this work will also identify proposed mitigation required to minimise any potential impact on ecology and nature conservation.

5.3.5 The proposals would result in the loss of hedgerow and hedgerow trees within the site that could form habitats that may support protected species. The consented extensions to the Cauldon quarries and working of the 'spine' landform between the Caldon Low and Cauldon limestone quarries involves the loss of land currently in use as pasture land, grassland and woodland.

5.3.6 Any loss of vegetation would be minimised wherever possible and any potential impacts on ecological interests would be assessed prior to vegetation removal. All hedgerow margins would be reinstated at the earliest possible opportunity in accordance with best practice restoration techniques, in which the mineral operator has significant experience.

5.3.7 Heatons welcome the opportunity to discuss the scope and extent of specific species surveys to be carried out as soon as possible in order to ensure that the risk of missing seasonal survey windows is kept to a minimum.

5.4 Noise

5.4.1 The extensions to the quarry complex at the site will bring mineral extraction closer to residential properties to the north and north-east of the site. The potential for impacts on any sensitive receptor will be thoroughly assessed and any potential for adverse impacts, including nuisance noise, will be identified.

5.4.2 A noise survey will be carried out at all identified sensitive receptors, subject to access, which will establish the baseline noise conditions at these locations. Surveys at eight additional locations will be carried out in addition to the compliance monitoring currently undertaken and, if permitted, historical monitoring data can be reviewed for the four monitoring locations to provide data regarding existing background noise levels. The impacts of the introduction of further mineral operations in the new areas will then be considered and their acceptability determined in accordance with accepted standards.

5.4.3 In addition to the operator reducing the use of noise-generating activities wherever possible, specific mitigation measures will be considered in addition to best practice measures, where necessary.

5.5 Air Quality and Dust

5.5.1 As stated above when discussing the potential for noise impacts, generation of dust and impacts on air quality as a result of the proposal will be assessed through a proportionate air quality and dust impact assessment.

5.5.2 It is not considered that the development has the potential to impact on air quality management areas (AQMAs), as none are designated locally. The site is located in a primarily rural area, with principal sources of pollution arising from the Cement Plant and Caldon Low Asphalt Plant. The closest major roads are the A523 and the A52 north and south of the site respectively.

5.5.3 Nevertheless, an Air Quality Assessment is proposed which will include a review of current policy, assessment of baseline conditions using data obtained by the local authorities, national networks and other air quality monitoring data of relevance, and modelling of the potential impacts on air quality of emissions arising from existing and additional traffic associated with the operations. This will enable the significance of

the predicted impacts to be determined and any mitigation measures to minimise residual impacts may be brought forward. Detailed modelling will include an assessment of the impacts on the oxides of nitrogen (NO_x) and fine particles (PM10).

5.5.4 Assessment of traffic-related air quality impacts will also rely on the monitoring of traffic flows through Annual Average Daily Traffic (AADT) figures. In addition, traffic speeds on each road/junction and the proportion of heavy goods vehicles (HGVs) will be determined.

5.5.5 To determine potential impacts on receptors through nuisance dust and PM10, a Dust Assessment will be undertaken in accordance with Planning Practice Guidance and the detailed guidance for describing dust impacts provided by the Institute of Air Quality Management: Guidance on the Assessment of Mineral Dust Impacts for Planning, 2016. The assessment will establish the baseline conditions of the existing dust climate, identify site activities that could lead to dust emissions without mitigation, identify site parameters which may increase the potential for dust impacts, and recommend mitigation measures as necessary.

5.5.6 Representative sensitive receptors will be subject to baseline monitoring, subject to access, for a minimum period of three months.

5.6 Impact on the Water Environment

5.6.1 Given the scale and nature of the proposed development, planning regulations require both hydrological & hydrogeological and flood risk assessments (H&HIA and FRA) be carried out in support of the planning application.

5.6.2 The H&HIA will involve the collection and review of topographical, geological, and hydrological information which will then be correlated into a Geographic Information System (GIS) for ease of systematic review and provision of supporting mapping for final reporting. Coupled with information gathered during a water features survey, a conceptual hydrogeological model of the site and surrounding area will be formulated.

5.6.3 The H&HIA will then assess the likely direct and indirect impacts upon the water environment of the current and proposed extraction and subsequent restoration. Subject to recommendations that existing measures are acceptable and appropriate

going forward, existing mineral extraction and water management techniques will continue to be employed to facilitate the recovery of mineral, to a maximum depth approximating to that already achieved at the site without recourse to significant off-site dewatering.

5.7 Traffic

5.7.1 No new accesses from the public highway are proposed to/from any elements of the site. However, HGV movements associated with the site are proposed to increase in comparison with the current level.

5.7.2 The existing measures implemented to maintain acceptable standards of highway safety are proposed to be retained across the site. These measures including wheelwashes and other measures to prevent the deposit of deleterious materials onto the public highway will be scrutinised for their current effectiveness and updated as necessary.

5.7.3 A detailed Transport Assessment (TA) would be undertaken post-liaison with the local highway authority to determine the scope of the TA. It is expected that the TA will establish the number of trips generated by the current operations and will identify the distribution of these trips and routes currently taken. Subsequently, the trips to be generated as part of the future operation of the site will be identified and their acceptability in terms of highway capacity and safety tested against the existing baseline situation and traffic flows. Traffic counts will be undertaken to determine this baseline. Traffic surveys will be undertaken within the months of March, April, May, June, September and October (outside of school holidays).

5.8 Archaeology / Cultural Heritage

5.8.1 The site contains areas of yet-to-be-worked consented mineral reserves beneath virgin land. The north-east of the site is also in close proximity to a Scheduled Ancient Monument at Milk Hill. A desk-based assessment would be used as a baseline study for assessing the potential impact the development may have on any identified archaeological and cultural heritage resource.

5.8.2 We consider that a Heritage Assessment is required which may contain geophysical survey and/or trial trenching recommendations. We welcome comments relating to the scope of assessment recommended by the County Archaeologist.

5.9 Soils and Agricultural Land

5.9.1 The future operations across the site involve the stripping, movement and management of soils. We consider that an appropriate Soil Resources Assessment be carried out which will outline the soils present and will classify the grade of agricultural land present.

5.9.2 No soils will be exported off site and any stripped soils will be used immediately for restoration purposes where possible or stored in appropriate locations. The risk of soil degradation as a result of operations derives largely from damage to soils during stripping or moving soils when wet and therefore best practice soil handling techniques will be deployed.

5.9.3 Soil stripping will take place in the driest parts of the year and will be avoided during or just after heavy rainfall.

5.9.4 Soil handling advice will be presented as part of a technical report completed by qualified specialists. A review of stockpiled soil resources across the site will also be carried out, as required.

6 Other Considerations

6.1 Need and Economics

6.1.1 A future planning application would consider the socio-economic impacts of the proposal including the likely employment and other economic benefits associated with the proposal at the local level.

6.1.2 Consideration will be given as part of the Environmental Statement to the need and supply of limestone to meet anticipated demand. Regard will be given to the likely economic consequences of the proposed scheme and the likely consequences of the scheme not being carried out as per the proposals (see also 'Alternatives').

6.2 Cumulative Impacts

6.2.1 The NPPF identifies the need to consider the level of existing activity and impacts from an operation/number of local operations upon localities, particularly those that will increase/prolong the potential for impact. A cumulative impact assessment will be undertaken as part of the Environmental Impact Assessment. This assessment will give particular regard to the existing mineral and cement-production operations currently being carried out across the site, and the mineral operations taking place in the wider vicinity of the site.

6.3 Alternatives

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

6.3.2 The Environmental Statement will provide details of the alternatives to the proposal considered and will outline why the details of the proposal were chosen and why alternatives were discounted. The Environmental Impact Assessment will assess why the working areas, depths, and methods have been selected as the preferred options. The alternatives methods of transporting materials within the site boundaries and transport of materials to market will be outlined and reasons will be provided outlining why the alternative transport methods were discounted.

6.3.3 Details of the preferred option for the site's comprehensive restoration will be thoroughly detailed within the Environmental Statement. However, an assessment of alternative restoration options will be provided which will set out why the preferred option has been chosen as the most appropriate.

6.4 Community Engagement

6.4.1 Government guidance contained in the NPPF identifies the importance of involving the community on an iterative basis. As part of the Scoping process we welcome input

both from the Statutory and Technical Consultees, as well as the relevant Parish Councils that engage with matters relating to the site.

6.4.2 As part of the formulation of a planning application, the Company will engage further with the relevant Parish Councils prior to the submission of a planning application to allow local members the opportunity to make comment and for any further measures to be incorporated within the scheme prior to formal submission. Exhibitions if required could also be undertaken to allow the wider community to feed into the proposals.

7 Conclusions

7.1.1 In accordance with the Town and Country Planning (Environmental Impact Assessment) Regulations 2017, it is our view that the proposed development would fall within Category 2a (extractive industry) of Schedule 2 of the Environmental Impact Assessment Regulations 2017. Category 2a defines all quarries to be caught by the thresholds and require Environmental Impact Assessment.

7.1.2 This document sets out an overview of the proposed development and includes detail regarding the scope of the Technical Assessment work that will form part of the Environmental Impact Assessment. The intention of this Scoping process is to agree the parameters of environmental assessment required to be submitted to SCC alongside the future planning application for the development proposed.

7.1.3 In summary, technical works are proposed to include:

- Landscape and Visual effects;
- Ecology and Nature Conservation effects;
- Noise effects;
- Air Quality and Dust effects;
- Impact on the Water Environment;
- Effects of Traffic;
- Archaeology/Cultural Heritage effects; and
- Impact on Soils and Agricultural land.

7.1.4 With regard to the above, and the specific content of this document, the views of SCC are hereby sought through a formal Scoping Opinion for the proposed development.