

## Replacement Local Minerals Plan Review

Comments should address the methodology and its application to each site.

Site specific comments should aim to influence the RAG status

Relevant sites are A6, A47, A48, A89, A92 and A93 all of which either lie within or border the Parish of Bradwell with Pattiswick

*Thoughts* reflect the views of the Chair of Bradwell with Pattiswick Parish Council

Views of the community will be reflected in the Parish Council's response

Text in quotes "" is drawn from the draft Replacement Local Minerals Plan and its associated documents.

### General

"The economic importance of minerals

1.4 "Every new home requires an average of 60 tonnes of mineral products. In short, we could not maintain our current way of life without them."

3.1f "The Council promotes sustainable procurement and construction techniques and the use of alternative building materials in accordance with national and local policies."

*Therefore, it should be safe to assume Essex County Council is already working through Local Planning Policies to significantly reduce this figure and produce truly sustainable development in the context of conserving and enhancing the natural and historic environment.*

### 3.1d **"d) Protecting Amenities and Communities**

All minerals development will be well-designed to afford protection to local communities and to contribute to the enhancement of the built, natural and historic environment.

Mineral developers will engage with communities to create the most appropriate local solutions."

*There has been no engagement with the local community for sites A89, A92, A93 and the local communities are opposed to the development of these sites.*

*There has been engagement with the local community for site A6 (previously allocated), A47 and A48 and the local community is cautiously supportive as the planned extraction will be sequential, there will be no additional traffic onto the A120 (above that which is already tolerated), Blackwater Aggregates provides support to the local community and local employment which will continue and there is a liaison group so any issues can be raised and resolved quickly*

## Methodology

*The Plan does not quantify the problem which makes comment on the proposed solution difficult.*

*Nevertheless, there is a paper "Forecasting the Need for Mineral Extraction in Essex 2025-2040" on the ECC web-site which provides some clues.*

There are already quarries at

Airesford, Tendring  
Ardleigh, Colchester  
Asheldham, Maldon  
Bradwell, Braintree  
Colemans Farm, Braintree  
Colchester Quarry, Colchester  
Crown Quarry, Tendring  
Elsenham, Uttlesford  
Highwood, Uttlesford  
Rayne, Braintree  
And others

All of these sites already have planning permission for sand and gravel extraction. How much sand and gravel remains to be extracted from these sites? 9.944Mt

There appear to be sites which have been allocated in the 2014 Plan which are not yet operational, what is the total capacity for these sites? 2.5Mt

For how many years will these sites provide adequate sand and gravel to meet forecast demand?

**Using the forecast demand (plus 20%) the total demand can be satisfied by between 54.04 and 66.49Mt allowing for a seven year landbank in 2040.**

Over the years there have been windfall sites for eg agricultural reservoirs. Since 1991 there has, on average, been an increase in the number of applications, submitted to ECC each year, associated with the construction of an agricultural irrigation reservoir. Between 1990-1995, 18 reservoir applications were submitted. However, between 2000-2005, 28 reservoir applications were submitted. In the ten years 2009-2019, 37 applications were approved; the mean mineral extraction proposed for the approved agricultural reservoirs is 370,130 tonnes. 13.69Mt in total over 10 years

What is the forecast demand?

**The figure being used is 3.98Mt per year**  
Average demand for previous 10 years plus 20%

Given the experience of the previous Plan, where there was a significant shortfall in demand (Forecast demand 2014 – 2022 was 4.31Mt per year, Actual demand 2014 – 2022 3.44Mt per year) *there should be a down-side risk as well as the up-side risk proposed.*

5.141 “Across the nine years since the MLP was adopted, the Plan provision rate exceeded the annual sales rate to the extent that 8.68mt of ‘expected’ sales were not made. It is important to note that this resource is not ‘lost’. At the [then] current plan provision rate of 4.31mtpa, the ‘saved’ sand and gravel amounts to just over an additional two years of provision.”

*Has any market research been done to suggest that there is an up-side risk to the current level of demand? If not, then there is little justification for the 3.98Mt per year figure and the Plan should be based on the 3.44m tonnes per year extrapolation of the past ten years with a ±20% risk analysis.*

Furthermore, with Policy S4 – Reducing the Use of Mineral Resources and Policy S5 – Creating a Network of Aggregate Recycling Facilities.. and Strategic objective 3a “To reduce reliance on primary mineral resources in Essex, firstly through promoting the mineral supply hierarchy to reduce the need for primary extraction of minerals and, secondly, by minimising waste by requiring that as much demolition, construction and excavation waste is re-used and/ or recycled, as far as is practicable” *the demand forecast should show a significant decline over the Plan period.*

**There are no figures in the draft Plan!!!**

Except

Para 2.29 “In 2019, Greater Essex ‘consumed’ 2.48Mt of land-won sand and gravel.”

Para 2.30 “...total exported from Greater Essex is 19% of total production.”

Total production ~ 3.03Mt

Context.....

If all of the extensions to existing quarries are allocated, 94.2Mt would be available for extraction.

If all of the sites were allocated, 148.35Mt would be available.

In addition, windfall supply from agricultural reservoirs can be expected of around 20Mt over the plan period.

The requirement then becomes a site allocation to meet demand for a mere **46Mt** for the plan period.

*There is no need to allocate any new sites, sympathetic extensions to existing sites should be adequate.*

**Site specific comments**

What meaning can be attached to the RAG status? Are there individual Red flags which alone would prevent a site being allocated, for example, no suitable road access or SSSI location?

*The following strategic objectives are relevant to strengthen objections to sites.*

Strategic objectives 6a

To provide protection from minerals development to designated areas of landscape, biodiversity, geodiversity, cultural and heritage importance, in a manner which is commensurate with their importance.

Strategic objective 6c

To maintain and/or enhance landscape, biodiversity and residential amenity for people living in proximity to minerals development.

Strategic aim 7

To reduce the impact of minerals extraction and associated development on the transport system.

3.12 The aim of the spatial strategy is achieved ...”by ensuring an appropriate geographical distribution of allocations”

**A6 - Bradwell Quarry (a) 2.5Mt**

Site A6 was allocated in the earlier Local Minerals plan 2014.

“The Site (A6) is located close to Bradwell Quarry, an existing working mineral extraction area. Bradwell Quarry defines the north and west boundaries of the Site, and therefore has a substantial presence within the area. Candidate Sites A47 and A48 are located within 0.6 kilometres of the Site A6, and will further contribute to the cumulative impact of minerals extraction sites within the surrounding area. Public views from the surrounding roads and the public right of way network will be impacted, with the wider landscape becoming further excavated and changing the character of the River Blackwater valley.”

“The Site operations would be in sequence to mineral operations across Site A7 within the MLP 2014.

The Site will be accessed from the existing Haul Road which provides access to Bradwell Quarry and the Integrated Waste Management Facility.”

*There will be no increase in traffic on the A120.*

The assessment states “Development on this Site would likely cause high levels of less than substantial harm to the significance of three listed buildings which are in close proximity to the boundary of the Site. These are: Woodhouse Farmhouse (Grade II, List UID: 1123843), Ancillary building/Brewhouse, Woodhouse Farm (Grade II, List UID: 1123844) and The Pump

at Woodhouse Farm (Grade II, List UID: 1169918).” *Yet this complex of buildings is already being sympathetically restored as part of the IWMF, so the assessment is incorrect.*

*Site A6 is a logical extension to existing mineral extraction with appropriate infrastructure, local employment and good relations with the local community.*

**A47 – Bradwell – Monk’s Farm (Kelvedon) 4.0Mt**

“The Site is promoted as an extension to an existing mineral Site (Bradwell Quarry) and is located to the East of Bradwell Quarry. The site area is approximately 84.8 ha and is proposed for 4 million tonnes of sand and gravel extraction which would be processed through the existing on-Site washing and screening plant located within Bradwell Quarry. The submission notes that the Site’s mineral extraction operations would commence in a planned and systematic manner consecutively to the existing mineral site.

The Site would be accessed using the existing access from the A120 and the internal haul road would be extended.

*There would be no increase in traffic on the A120.*

*Development of this site should be carried out in the same careful way in which Blackwater Aggregates have extracted sand and gravel from sites A3-A7, avoiding archaeological features, PROWs, etc providing continuity of local employment and good relations with the local community.*

**A48 – Bradwell – Grange Farm 12.2Mt**

“The Site is promoted as an extension to existing mineral site (Bradwell Quarry) and is located to the north east of Bradwell Quarry. The Site area is approximately 143.15 ha and is proposed for 12.2 million tonnes of sand and gravel extraction which would be processed through the existing on-Site washing and screening plant located within Bradwell Quarry. The submission notes that the Site’s mineral extraction operations would commence in a planned and systematic manner consecutively to the existing mineral site.

The Site would be accessed using the existing access from the A120 and the internal haul road would be extended.”

*There would be no increase in traffic on the A120.*

*To make this site acceptable, a number of mitigation activities will be required which are similar to mitigation already carried out by Blackwater Aggregates at sites A3-A7 and in consultation with the Liaison Group.*

*Development of this site should be carried out in the same careful way in which Blackwater Aggregates have extracted sand and gravel from sites A3-A7, avoiding archaeological features, PROWs, etc providing continuity of local employment and good relations with the local community.*

*Sites A6, A47 and A48 have road access which already exists, is well managed and phased extraction will not increase traffic on the A120. Road access to sites A89, A92 and A93 is not considered "suitable" will increase traffic on the A120 and it is unclear what mitigation can be provided.*

*Approval of sites A89, A92 and/or A93 in addition to sites A6, A47 and A48 would go against the aim of the spatial strategy (3.13) "to ensure an appropriate geographical distribution of allocations"*

*Bradwell with Pattiswick Parish has good quality (Grade 2) agricultural land – vital for food security – this is already being lost to a 35MW solar farm (67 hectares; 165 acres). Sites A89, A92 and A93 all comprise Grade 2 agricultural land.*

### **A89 – Covenbrooke Hall Farm - Stisted 2.45Mt**

"The Site is promoted as a new Site at land to the east of King's Lane, Stisted. The Site area is approximately 29.53 ha and is proposed for 2.45 million tonnes of materials for sand and gravel extraction with processing and distribution over an estimated life cycle of 23 years. Additional infrastructure needed on site includes a processing plant and new access route. The Site is promoted as accessible via a new access from King's Lane to A120 Coggeshall Road.

"Site A89 comprises three arable fields bounded by deciduous plantation woodland and an internal ancient hedgerow and strip of broadleaved deciduous plantation woodland. There is an ancient hedgerow and (partly dry ditch) – which is Priority habitat - on the eastern boundary adjacent to the plantation woodland. The internal hedgerow is Priority habitat and has a single significant mature boundary Oak tree. The internal hedgerow and broadleaved deciduous plantation woodland would be removed. There is another ancient hedgerow and associated ditch on the south of the woodland plantation that is located on the northern boundary.

"The eastern boundary contains ancient Field Maple trees and a locally notable Oak tree that is a prominent boundary feature of the Site.

*Emphasis needs to be placed on the moderate impact upon Priority habitats and species. This includes the direct loss of an ancient hedgerow within a mature tree, and loss of the central broadleaved plantation woodland and a small section on western boundary, as well as potential hydrological impacts to retained habitats, and loss of- and disturbance to- habitats for Priority farmland species.*

"The Site will affect the setting of four designated heritage assets:

- o Jenkin's Farmhouse (Grade II, List UID: 1123903)
- o Barn Approximately 5m NE of Jenkin's Farmhouse, List UID: 1123878)
- o Cartlodge/Granary at Jenkin's Farm (Grade II, List UID: 1234243)
- o Barn Approximately 10m N of Jenkin's Farmhouse (Grade II, List UID: 123450)

“The Site contains evidence recorded on the Essex Historic Environment Record (EHER) through aerial photography for historic field boundaries and historic quarrying and a modern military related structure is recorded within the Site.

“The Site lies along a Roman road.

“The Site has potential to contain Palaeolithic archaeological remains and Pleistocene faunal and palaeoenvironmental remains.

“Remains of a Cold War structure would require assessment and possible building recording should they survive within the Site.

*Development of this site fails strategic objective 6a and 6c and fails strategic aim 7 and contravenes Policy S10 (Protecting and Enhancing the Environment and Local Amenity)*

*Policy S11 (Access and Transportation) is relevant here*

*This site will generate more traffic on the A120.*

“Neither Kings Road nor its junction with the A120 Trunk Road are considered ‘suitable’ in their current form and it is unclear what mitigation can be provided.”

“From the information provided It is unclear if safe access to the Site can be achieved from Kings Lane and whether the intensification in use of the A120/Kings Lane junction by HGVs can be appropriately mitigated.”

*The junction of Kings Road with the A120 is an accident blackspot (see CrashMap – 8 accidents recorded each with at least one casualty, one serious in the last five years)*

*The design capacity of the A120 is 18,000 vehicle movements per day. The current traffic is 25,000 to 30,000 vehicle movements per day.*

*Speed limit is 50mph*

*There is an upward slope where Kings Lane meets the A120, an HGV loaded with aggregate does not accelerate quickly on level ground, it will accelerate even less quickly out of Kings Lane onto the A120.*

*The proposed life of this site at 23 years will impact local amenity for far too long.*

**A92 - Land at Pattiswick Hall Farm – Small Site 3.4Mt**

**A93 – Land at Pattiswick Hall Farm – Full Site 8.2Mt**

*Policy S10 and S11 are relevant here*

*Fails strategic objective 6a and 6c*

“The Site is promoted as a new Site at land at Doghouse Lane, Pattiswick, Braintree.

The Site area is approximately 65.45 ha [130.74ha] and is proposed for 3.4Mt [8.2Mt] of materials for sand and gravel extraction which will be transported to a processing plant on site where it will be washed, graded, and stocked before being exported off site. Additional infrastructure needed on site includes a processing plant with ancillary facilities, site management infrastructure and a network of haul roads across the Site.

“The Site is promoted as accessible via a new site access off the A120.

“The creation of a new access onto the A120 is contrary to Department for Transport Circular 1/2022 Strategic Road network and the delivery of sustainable development. Policy objection from National Highways.

“The Site largely falls within Enclosed Agriculture – Amalgamated Fields (National Historic Landscape Characterisation, NHLA) and is classified as Grade 2 – Very Good Quality Agricultural Land (Agricultural Land Classification).

“There are a number of listed buildings located around the Site, particularly focused in Bradwell. However, listed buildings located on the immediate edges include Pattiswick Hall (1337592) and Ancillary Building (1123881), Harvey’s Farmhouse (1337613) and Buildings (1123849) and Church of St Mary the Virgin (Grade II\* - 1168451).

“All Saints Church (Grade I) at Stisted is a prominent feature within the landscape within the northern parcel and is emphasised by the presence of Footpath 19 (Bradwell) which provides historic direct access across the Site. The setting of the PRow and church views would be significantly impacted as a result of mineral extraction works within this Site.

“The southern and eastern boundaries have few hedgerows and trees that could contribute to the enclosure of the Site, and therefore the Site has an open aspect and increased visual sensitivity. The setting of the two listed buildings located to the north of the Site at Pattiswick Hall, will be adversely impacted through mineral extraction of the surrounding landscape further, considering that the buildings are located on a ridge with strong views from the south at Bradwell.

“The Site is very open to public views, with a footpath that runs through the centre of the Site. There are also strong views from the A120 and Doghouse Road. Furthermore, there are other views available from Bradwell where strong private views from Bradwell village to the south are found, resulting in an increased overall sensitivity.

“There are few scattered trees near the watercourse in the southern portion of the Site which would be lost to the development. This includes an Ancient Oak tree, a possible Ancient Oak tree and Notable mature Oak. Ancient trees are classed as irreplaceable habitats. On the northern boundary of the south part of the Site is a boundary group of mature Oak trees, that collectively form a significant landscape feature. The connecting haul road is shown to cut through this group and would remove a mature Oak tree.

“Site A92 is within the Site of Special Scientific Interest Impact Risk Zone for Belcher’s and Broadfield Woods Site of Special Scientific Interest (SSSI). This is located c.2.5km to the north of the Site and is an ancient woodland.

“Site A93 is within the Site of Special Scientific Interest Impact Risk Zone for Belcher’s and Broadfield Woods Site of Special Scientific Interest (SSSI). This is located c.1.6km to the north of the Site and is an ancient woodland.

“The closest Local Wildlife Site (LoWS) is Blackwater Plantation West (reference Bra 158) which is less than 60 metres to the south of the Site, downhill. The ancient woodlands of the Marks Hall estate are just over 2.2km north of the A92 Site or 800m north of the A93 site and include several ancient woodland Local Wildlife Sites.



## DISCUSSION DRAFT

“Site A92 comprises arable fields bounded partly by Hedgerows, which are Priority habitat, and a ditch. There are two internal Hedgerows and a separate ditch. The ditches flow south toward the River Blackwater. Internal hedgerows, trees and the watercourse would be removed. A new access onto the A120 would need to cut through the boundary Hedgerow (Priority habitat). Priority species are present on-site.

“Site A93 comprises arable fields bounded partly by Lowland Mixed Deciduous Woodland and Hedgerow Priority habitats, and ditches on several boundaries. There are several internal Hedgerows and a separate ditch. The ditches flow south toward the River Blackwater. Internal hedgerows (Priority habitat), mature Oak trees and the watercourse would be removed or need dissecting to accommodate a haul road and access onto the A120.

“The Sites are graded Red/Amber because they could have a serious impact upon Priority habitats and species; this includes potential impacts to the River Blackwater and its associated riparian habitats. In addition, the Sites could have moderate impacts upon irreplaceable habitats, i.e., the Ancient tree situated within the Sites. There would also be a direct loss of Hedgerows and dissection through several more; loss of a possible Ancient tree, a Notable tree, mature tree, and a watercourse. There could be potential hydrological impacts to retained habitats and loss of- and disturbance to- habitats for Priority farmland species.

“Adequate and appropriate compensation would be required for the loss of Hedgerows, trees, watercourses, and loss of habitat for Priority farmland species. Losses to irreplaceable habitats (including ancient trees) are not permitted within the Government’s Biodiversity Net Gain (BNG) Metric and bespoke assessment and compensation would be required to be agreed with the MPA. Any bespoke compensation would be outside the BNG Metric calculations (The Biodiversity Metric 4.0 User Guide, 2023); bespoke compensation would be required, which could not count towards any Biodiversity Net Gain calculations.

“The allocation of site A93 will likely cause ‘less than substantial harm’ harm to the setting of 8 designated heritage assets. These are:

- o 44 and 45 Old Lane, (Grade II, List UID: 1123849)
- o Harvey’s Farmhouse (Grade II, List UID: 137613)
- o Pattiswick Hall (Grade II, List UID: 1337592) and ancillary building 35m east of Pattiswick Hall (Grade II, List UID: 1123881)
- o Wren’s Cottage (Grade II, List UID: 1123886)
- o Church of St Mary the Virgin (Grade II\*, List UID: 1168451)
- o 9 Water Lane (Grade II, List UID: 1337590)
- o Stisted Conservation Area

“The Site A93 will have no direct impact to any heritage assets; the impact will be indirect, due to a change to the assets’ settings.

“The undeveloped, agrarian landscape of Site A93 contributes to the setting and significance of the listed buildings and the fundamental change in land use and land character would undermine the ability to understand and appreciate their significance.

## DISCUSSION DRAFT

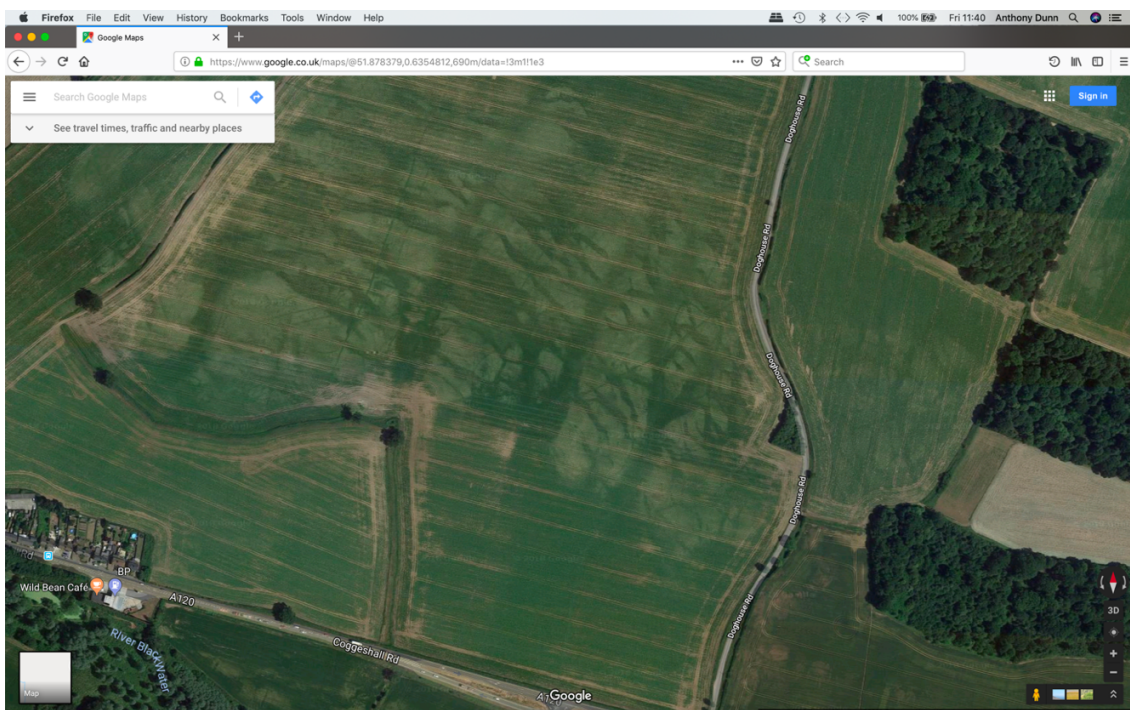
“Due to the proximity of Site A93 to the listed buildings identified above, and the contribution the Site makes to the significance of these buildings, the proposed Site is considered to cause either a mid or a low level of harm to their significance.

“The Site lies within an area of archaeological features as identified through aerial photographic evidence.

“The Site lies adjacent to a Roman road and contains cropmark evidence for possible settlement or ritual activity and agricultural activity.

*The Bradwell with Pattiswick Neighbourhood Plan has identified a number of heritage assets which should be protected, and where appropriate enhanced, for the enjoyment of current and future generations. In addition to existing ‘designated’ heritage assets, the Parish Council has identified the following ‘non-designated’ heritage assets which are of significant local importance and require ongoing protection and enhancement:*

### *b) Cropmarks South of Pattiswick;*



According to Essex HER these cropmarks, which are registered as a Monument, represent enclosures, ditches, trackway etc suggesting intense activity

“Site A93 is within Zone III - Total Catchment Groundwater SPZ and has unproductive / low / medium to low groundwater vulnerability. The Site is within a Drinking Water Safeguard Zone (Surface Water) and is within Drinking Water Protection Areas (Surface Water). A water course (River Blackwater) is 60m south west of the Site, another water course is 2m north, an additional water course is 10m north west and another is 20m north west. There is a small water body in the northern half of the Site. Appropriate consideration would be

required to mitigate the potential impacts on hydrology, hydrogeology, and drainage – high levels of mitigation may be required.

“Two residential buildings are adjacent to the boundary of Site A92 (0m). Eight residential buildings and one building of unknown use are outside the Site boundary less than or equal to 20m from the Site. Five residential buildings and two commercial buildings are more than 20m but less than or equal to 50m from the Site. Five commercial buildings, twenty one residential buildings, five farm buildings and one community facility (place of worship) are more than 50m but less than or equal to 250m from the Site. Given the proximity of sensitive receptors, mitigation would be required, however, the levels of mitigation required to ensure that there are no serious impacts on health and amenity would likely be difficult to achieve.

“One farm building is within the Site A93 boundary. Two farm buildings and two residential buildings are adjacent to the boundary of the Site (0m). Ten residential buildings and one building of unknown use are outside the Site boundary less than or equal to 20m from the Site. Five residential buildings and two commercial buildings are more than 20m but less than or equal to 50m from the Site. Eleven commercial buildings, thirty five residential buildings, five farm buildings and one community facility (place of worship) are more than 50m but less than or equal to 250m from the Site. Given the proximity of sensitive receptors, mitigation would be required, however, the levels of mitigation required to ensure that there are no serious impacts on health and amenity would likely be difficult to achieve.

*Neither of these sites should be allocated because the creation of a new access onto the A120 is contrary to Department for Transport Circular 1/2022 Strategic Road network and the delivery of sustainable development. These sites are identified in the Bradwell with Pattiswick Neighbourhood Plan (2019) as ‘non-designated’ heritage assets which are of significant local importance and require ongoing protection and enhancement. Development of these sites would cause permanent damage to the landscape with the impact on local listed buildings, permanent damage to ancient hedgerows and Priority habitats, loss of good quality agricultural land (required for food security), adverse impacts on hydrology, hydrogeology, and drainage which would be difficult to mitigate and given the sites proximity to residential properties there would be serious impacts on health and amenity which cannot be mitigated.*

Finally,

3.13 The aim of the spatial strategy is achieved ...”by ensuring an appropriate geographical distribution of allocations”

*The allocation of three extension sites within a single Parish should be more than enough to satisfy the spatial strategy without the addition of new sites within that Parish.*