

Response ID ANON-CEW5-799P-D

Submitted to Candidate Sites Assessment document consultation 2024

Submitted on 2024-03-12 16:03:35

Consent

Do you give consent for your response to this consultation to be published?

Yes

About you

What is your name?

Title:

Mr

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Tony

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Dunn

What is your email address?

Email:

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Are you.....

Not Answered

Organisation

Name of organisation:

Bradwell with Pattiswick Parish Council

Are you responding on behalf of another individual or organisation?

No

If Yes, who?:

What is your postal address?

Address line 1::

Bradwell Village Hall

Address line 2::

Church Road

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County::

Essex

Post code::

CM77 8EP

Introduction

Do you have any comments on the site assessment work in general including the methodology (non-site specific)?

Yes

comments:

There appears to be little consistency between the RAG assessment and the comments supporting the assessment, unfortunately, I am unable to highlight the key words to emphasise this point, nevertheless, for example...

LANDSCAPE CHARACTER

A6 The Site possesses few characteristic features of the Blackwater/Brain/Lower Chelmer Valleys (C6) Landscape Character Area (LCA), which includes the predominantly arable farmland and well hedged fields. The River Blackwater and associated valley features have limited presence within the immediate landscape, and therefore reduces the sensitivity of the Site to minerals extraction.

Red/Amber..... should be Amber or even Green/Amber

A22 The Landscape Character Area (LCA) is Central Essex Farmlands (B1) and possesses some characteristic features of the LCA, which includes the arable farmland landscape. The works would erode the existing attractive features of the small, secluded valley, (which is most attractive at the east) and the views of it from the public footpath. Overall, sensitive Mitigation for visual impact toward public receptors will be required to keep in context with the local landscape character.

Amber

A47 The Site possesses few characteristic features of the Blackwater/Brain/Lower Chelmer Valleys (C6) Landscape Character Area (LCA), which includes the predominantly arable farmland and well hedged fields. The River Blackwater and associated valley features has limited presence within the immediate landscape, and therefore reduces the sensitivity of the Site to minerals extraction.

Amber

A49 The Site is very characteristic of the Blackwater/Brain/Lower Chelmer (C6) Landscape Character Area (LCA). Located on the edge of the River Blackwater, the western parcel of the Site comprises linear willow and poplar plantation which is a strong local feature of the landscape. The remainder of the Site comprises arable fields separated by established hedgerows, also located on the valley sides. With open views of the river, appropriate consideration is required to protect the characteristic features of the LCA, particularly on the setting of the River Blackwater valley floor, and mitigate the impacts on the landscape.

Red/Amber

A54 The Site comprises several characteristics of the Central Essex Farmlands (B1) Landscape Character Area (LCA), including the medium sized arable fields marked by hedgerows, with woods and copses providing structure and edges in the landscape. Appropriate consideration is required to protect characteristic features of the LCA, particularly the woodland on the southern boundary, which would require an adequate buffer to mitigate potential impacts on the landscape

Green/Amber

A57 The Landscape Character Area (LCA) is Central Essex Farmlands (B1) of which the Site possesses a number of distinct characteristic features of the LCA including the irregular field pattern of arable farmland intersected by hedgerows. Appropriate consideration is required to protect the characteristic features of the LCA and mitigate the impacts on the landscape.

Green/Amber

A89 The Site bridges two Landscape Character Areas (LCA), and possesses features of both areas, including arable farmland with well-hedged medium to large fields (Blackwater/Brain/Lower Chelmer Valleys, C6) and small woods and copses that provide structure and edges to the landscape (Central Essex Farmlands, B1). [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.]

Appropriate consideration is required to protect the characteristic features of the LCA, particularly the effect on the established tall hedgerows and trees that line the field boundaries.

Green/Amber Should be Red/Amber

A92/93 The Site is graded Red/Amber because it 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 Site could have major impacts upon irreplaceable habitats, i.e. the Ancient tree situated within the Site. There would also be a direct loss of two Hedgerows and dissection through another; loss of a Notable tree and a watercourse. There could be potential hydrological impacts to retained habitats and loss of- and disturbance to- habitats for Priority farmland species.

Red/Amber Agreed, although the comments appear to relate more to biodiversity than landscape character

Yield and Next Steps

Do you have any comments on this section?

Yes

comments:

We do not believe the forecasts in S6 of the other paper are sound and would refer you to our comments on S6

The sum of the declared yields for all of the sites is 148.35Mt, admittedly there will be some double counting eg A93 includes A92, but this figure is not

close to the 117.55MT in para 4.1

The sum of extensions (ie excluding new sites) is 94.42Mt

A6 - Bradwell Quarry – BRAINTREE

Do you have any comments on the assessment of this site?

Yes

Please provide any comments below:

comments:

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. It was previously allocated and should again be allocated.

A47 - Bradwell (Monk's Farm) – BRAINTREE

Do you have any comments on the assessment of this site?

Yes

Please provide any comments below:

Please provide comment::

“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) – BRAINTREE

Do you have any comments on the assessment of this site?

Yes

Please provide any comments below:

Please provide comment::

“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.

We understand the concerns of Coggeshall residents and would suggest the Eastern boundary of the site be moved a few hundred yards to the East, although development of this part of the site is unlikely during the Plan period if policies to reduce sand and gravel extraction are fulfilled.

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 Policy 2.7 and the aim of the spatial strategy (3.13) "to ensure an appropriate geographical distribution of allocations" and would go against Vision statement 3.1g Protecting Mineral Resources and Facilities

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 – BRAINTREE

Do you have any comments on the assessment of this site?

Yes

Please provide any comments below:

Please provide comment::

The western boundary of this site is less than half a mile from the Parish boundary of Bradwell with Pattiswick which has five proposed sites within its boundary and already has a working quarry.

The aim of the spatial strategy is achieved ..."by ensuring an appropriate geographical distribution of allocations". Allocation of this site would fail this strategy.

"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."

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 hotspot (see CrashMap – 8 accidents recorded each with at least one casualty, one serious in the last five years). There are many more minor incidents which cause significant delay to the flow of traffic and inconvenience to residents of Stisted and Bardwell with Pattiswick.

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 on the A120 and 60mph on Kings Lane.

Neither Kings Lane nor the A120 are safe for pedestrians, cyclists or horses.

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

"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 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. There are badger setts and fox dens in the boundary hedgerows of this site.

"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)

The site should not be allocated.

A92 - Land at Pattiswick Hall Farm (Small Site) – BRAINTREE

Do you have any comments on the assessment of this site?

Yes

Please provide any comments below:

Please provide comment::

"The Site A92 will have no direct impact to any heritage assets; the impact will be indirect, due to a change to the assets' settings. Not true.

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;

This is the entire area of A92

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

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

"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.

"3.195 It will continue to be unacceptable for new junctions to be created straight onto a trunk road"

Any new junction would be close to the existing entrance to Bradwell Quarry and the Integrated Waste Management Facility (Indaver Rivenhall) and to the junction of Doghouse Road with the A120.

This site would increase HGV and other vehicular traffic on the A120 which is already overloaded - design capacity 18,000 vehicle movements per day; actual vehicle movements per day 25,000-30,000. This is contrary to Policy S11, which requires a reduction in traffic across the road network.

"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). This site should not be allocated as it is required for food security. Bradwell with Pattiswick Parish has already lost 67 hectares of Grade 2 agricultural land to a solar farm resulting in the loss of 500 tons per year of good quality wheat for the next 40 years.

With respect to the fifteen residential buildings within 50m of the site and the eleven commercial buildings, thirty five residential buildings, five farm buildings and one community facility (place of worship) more than 50m but less than or equal to 250m from the Site., we agree that the levels of mitigation required to ensure that there are no serious impacts on health and amenity would likely be difficult to achieve.

Finally, Bradwell Quarry is on the other side of the A120 to this proposed site - this is a site which should continue to operate - accordingly, in order to satisfy 3.13 The aim of the spatial strategy is achieved ... "by ensuring an appropriate geographical distribution of allocations" site A92 should not be

allocated.

A93 - Land at Pattiswick Hall Farm (Full Site) – BRAINTREE

Do you have any comments on the assessment of this site?

Yes

Please provide any comments below:

Please provide comment::

"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. Not true. 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;

This is the entire area of A92 (half of the area of A93)

There are further cropmarks - two significant circles - in A93.

According to Essex HER these cropmarks, which are registered as a Monument, represent enclosures, ditches, trackway etc suggesting intense activity. "The Site lies adjacent to a Roman road and contains cropmark evidence for possible settlement or ritual activity and agricultural activity.

"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.

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"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). This site should not be allocated as it is required for food security. Bradwell with Pattiswick Parish has already lost 67 hectares of Grade 2 agricultural land to a solar farm resulting in the loss of 500 tons per year of good quality wheat for the next 40 years.

The site is correctly graded Red/Amber for the potential loss of priority habitat which would be lost and for which there is no mitigation.

The site is open to views from Stisted Church (Grade 1 listed), from a number of PRoWs, from Doghouse Lane and the Coggeshall Road. The visual impact of a quarry with its associated processing plant and ancillary buildings would be severe and impossible to mitigate.

The site includes or is close to a number of listed buildings (8 designated heritage assets), 52 residential buildings, thirteen commercial buildings, a number of farm buildings and a community facility - the levels of mitigation required to ensure that there are no serious impacts on health and amenity would likely be difficult to achieve.

Neither A92 or A93 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.