



Braxted & Blackwater Conservation Group (BBCG)

5th March 2024

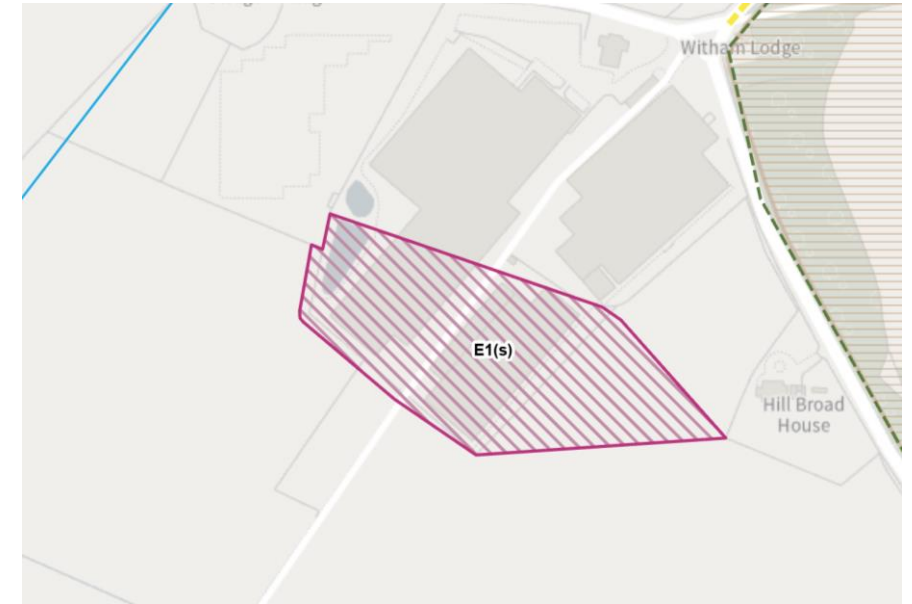
Agenda

- Historical Issues and Context
 - Commodity Centre
 - Maldon District Council (MDC) Local Plan – GB1 proposal
 - A12 Road Widening Project
- Brice Aggregate Planning Application
 - Conveyor Belt and Processing
- Essex County Council Minerals Plan
 - Call for Sites Consultation – 19th March

Historical Context

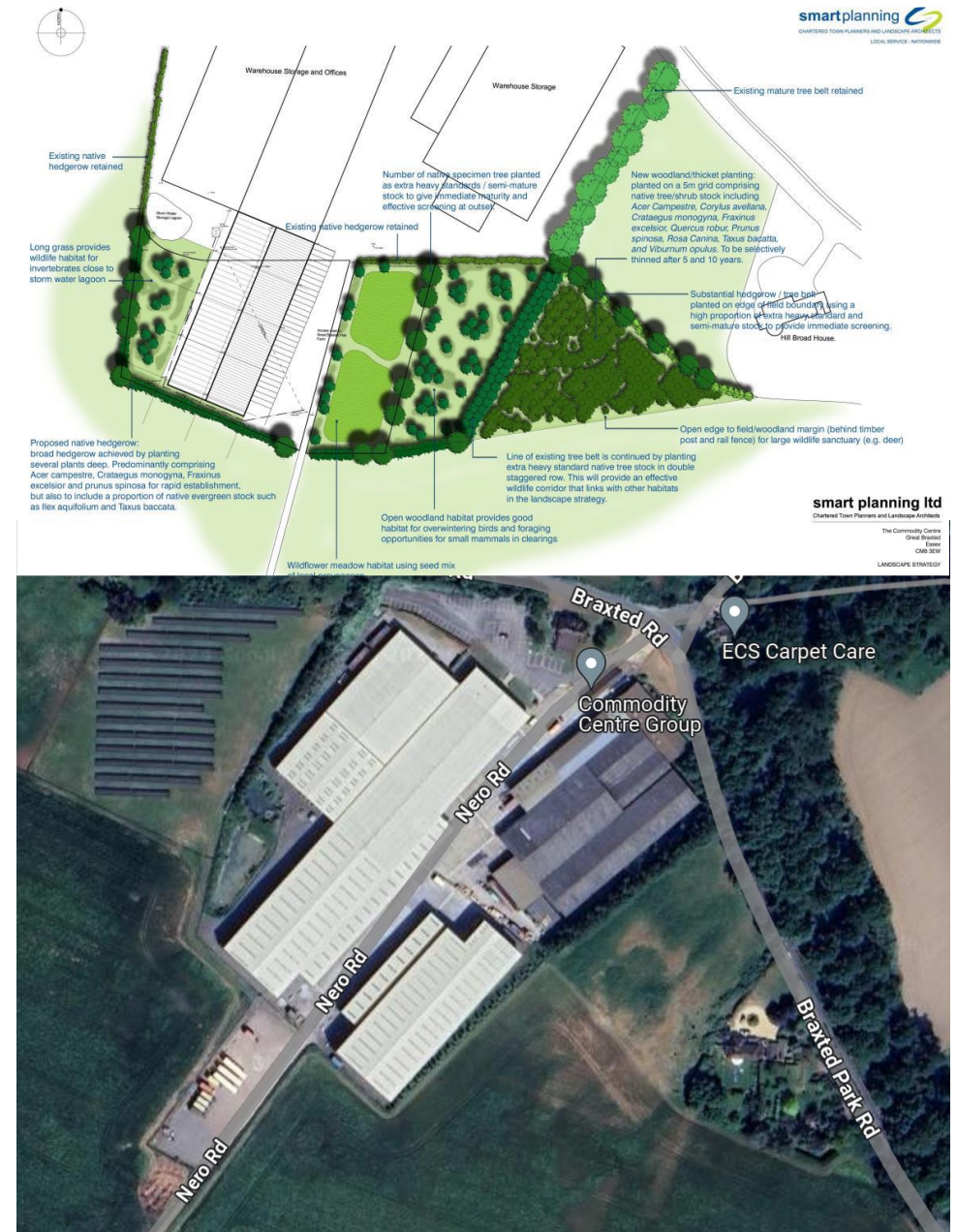
- **Commodity Centre**

- Approved employment allocation under the Maldon District Council (MDC) Adopted Local Development Plan 2014 – 19
- A recent statement at the Little Braxted Parish Council meeting suggested that all fields to the rear of the Commodity centre are allocated for employment is incorrect
- The only section not developed, is required to be Landscaping to mitigate the impact upon my own property!



No Planning Enforcement

- The new storage warehouse was constructed without planning permission – retrospective application allowed
- The 24/7 HGV lorry car park has been constructed without planning permission – amended proposal retrospectively allowed, but has never been implemented
- The conditional landscaping and planting for mitigation and biodiversity is non-existent.
- Local issues raised with the MDC Enforcement Team for over 7 years – nothing has been done!



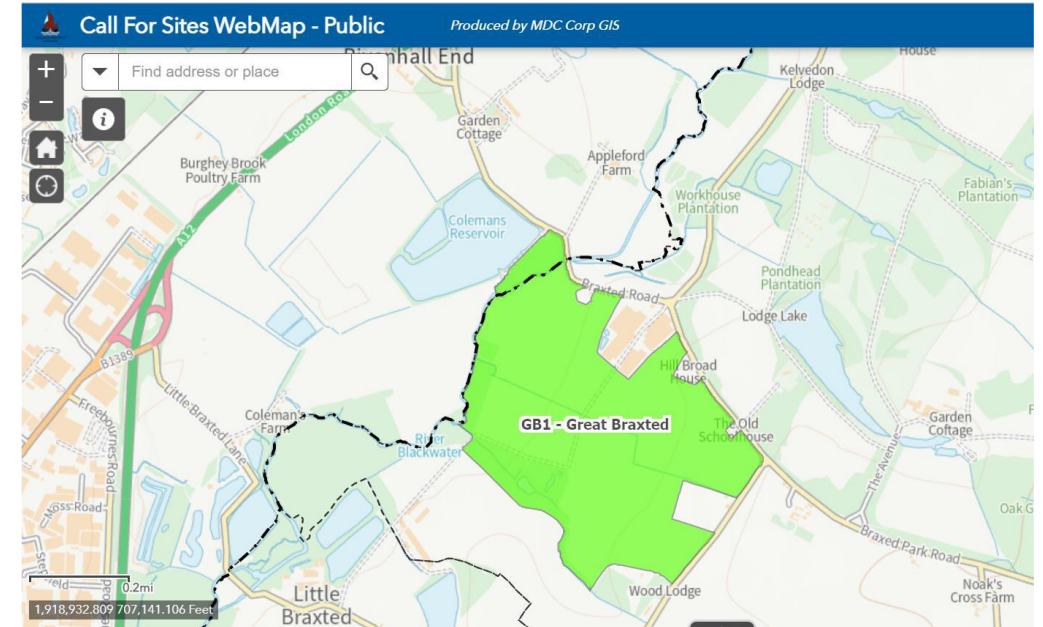
Historical Issues

- Daily/Night-time External illumination and light pollution
- Daily Working outside of designated hours
- Increase in HGV traffic
- Storage of plant, machinery and materials visible outside warehouses
- Unlawful extension of storage warehouses
- Creation of HGV Lorry Park in open countryside
- Failure to rectify despite retrospective consent for varied car park
- Failure to implement required/promised landscape mitigate and biodiversity net gain
- No landscape maintenance for anything that has been delivered – everything is dead!

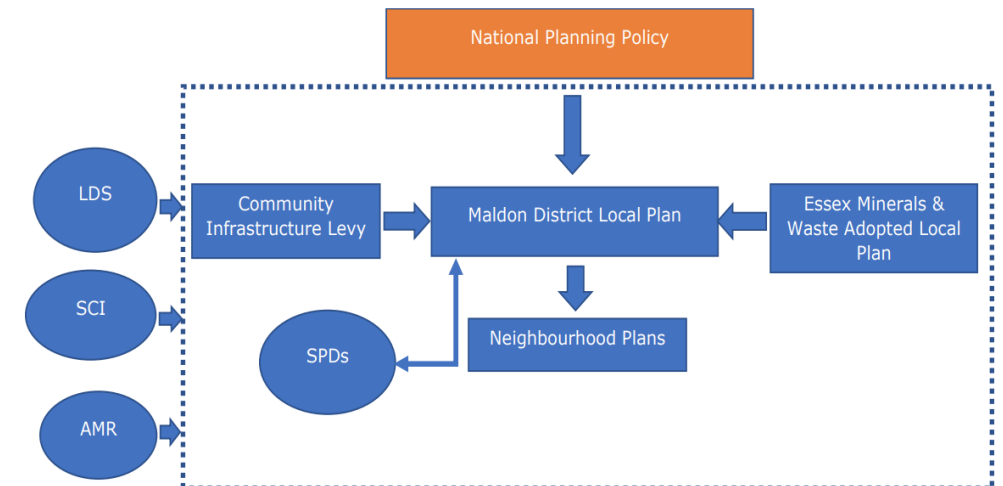


MDC Local Plan

- **MDC decided to pursue 3 preferred growth options for the District on 14th September 2023**
 - i. Option 3 - *Growth in Towns and Large Villages*
 - ii. Option 5 (*new satellite settlement or large urban extension*) in combination with Option 3
 - iii. Option 7 (*settlements that run along the railway line in the south*) in combination with Option 1 (*current plan to focus growth focus growth in Maldon/Heybridge and Burnham on Crouch*)
- **Call for Sites:**
 - GB1 proposed for additional warehousing
 - 57 hectare employment site proposal
 - Same site has also been put forwards as part of the Minerals Plan Call for Sites
- **BBCG objected**
 - Option 5 needs to continue to be monitored

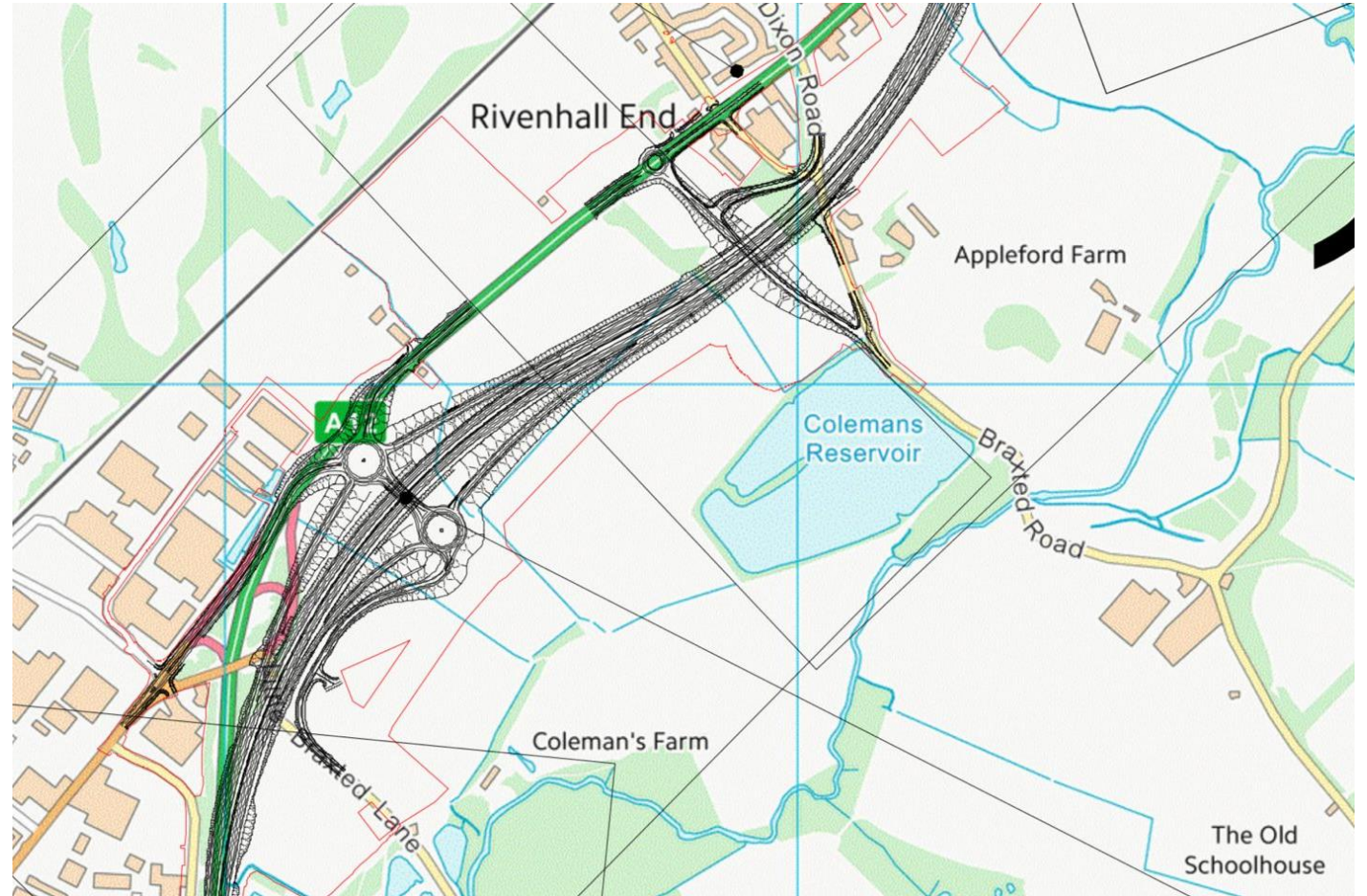


Appendix 1: Local Development Plan Diagram



National Highways – A12 Road Widening

- Strategic National Highways Infrastructure project
- Development Consent Order granted on 12th January 2024
- De-trunking of A12 and new Junctions at Witham and Kelvedon





Brice Aggregates – Conveyor Belt & Processing

- **Statement of Common Ground**
 - National Highways and Brice Family
- **Assets to be transferred/sold**
 - To facilitate A12 road widening
- **Brice Aggregates has argued:**
 - Compensation because of A12
 - Delay restoration plans
 - Accelerate current quarrying
 - Relocate current processing plant
- **Planning Application Submitted**
 - Subject to A12 road widening
 - In advance of Minerals Plan

3.2. 15.	Operation of Quarry – during and post scheme to include both the Processing and Batching Plant	The Brice Family acknowledge discussions regarding this matter are ongoing but reiterate the importance of being able to establish a new aggregate processing yard and weighbridge / access where existing facilities will be within the A12 land take boundary. The successful resolution of this matter is critical to business continuity.	The Applicant has been engaging with BAL to agree the relocation of the processing plant and batching plant and minimise impacts on BAL and their operations, as far as reasonably practicable. The Applicant has been working with the Brice Family to ensure that minerals are extracted ahead of the construction of the new junction 22 to limit the financial impact on the quarry operations. The Applicant and the Brice	Under discussion	May 2023
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Planning Inspectorate Scheme Ref: TR010060
Application Document Ref: TR010060/EXAM/8.8

Page 43

A12 Chelmsford to A120 widening scheme

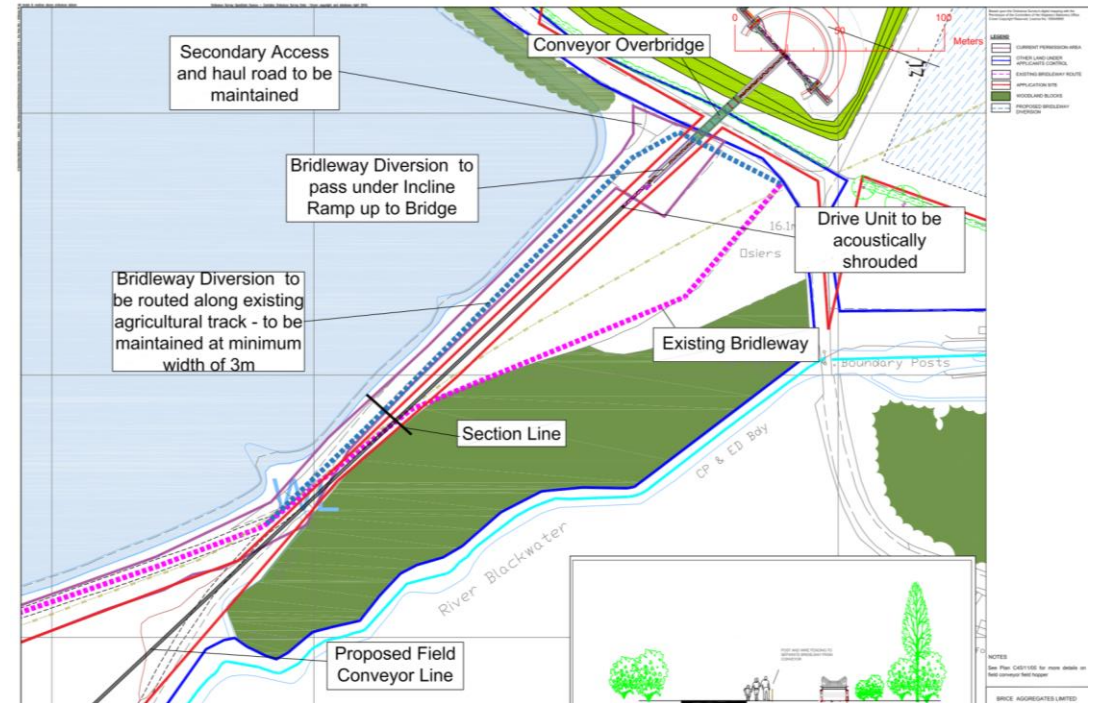
Statement of Common Ground with <Title_3>



Ref	Issue	Doc Ref	Brice Family Position	National Highways Position	Status	Date
				Family have been holding regular monthly meetings since January 2022 and Heads of Terms for relocation of the processing plant were sent to BAL by the Applicant in November 2022. The Applicant met with BAL on 17 th January 2023, where BAL advised that they hope to respond to the Heads of terms in February 2023. An application has been submitted for the relocation of the on-site processing plant, Ready Mix Concrete plans and ancillary features on 28 th April 2023. A Screening Opinion was submitted for this application (ESS/45/22/BTE/SO) which determined that the proposed application requires EIA. Pre-application activities such as public consultation and survey work have been carried out.		

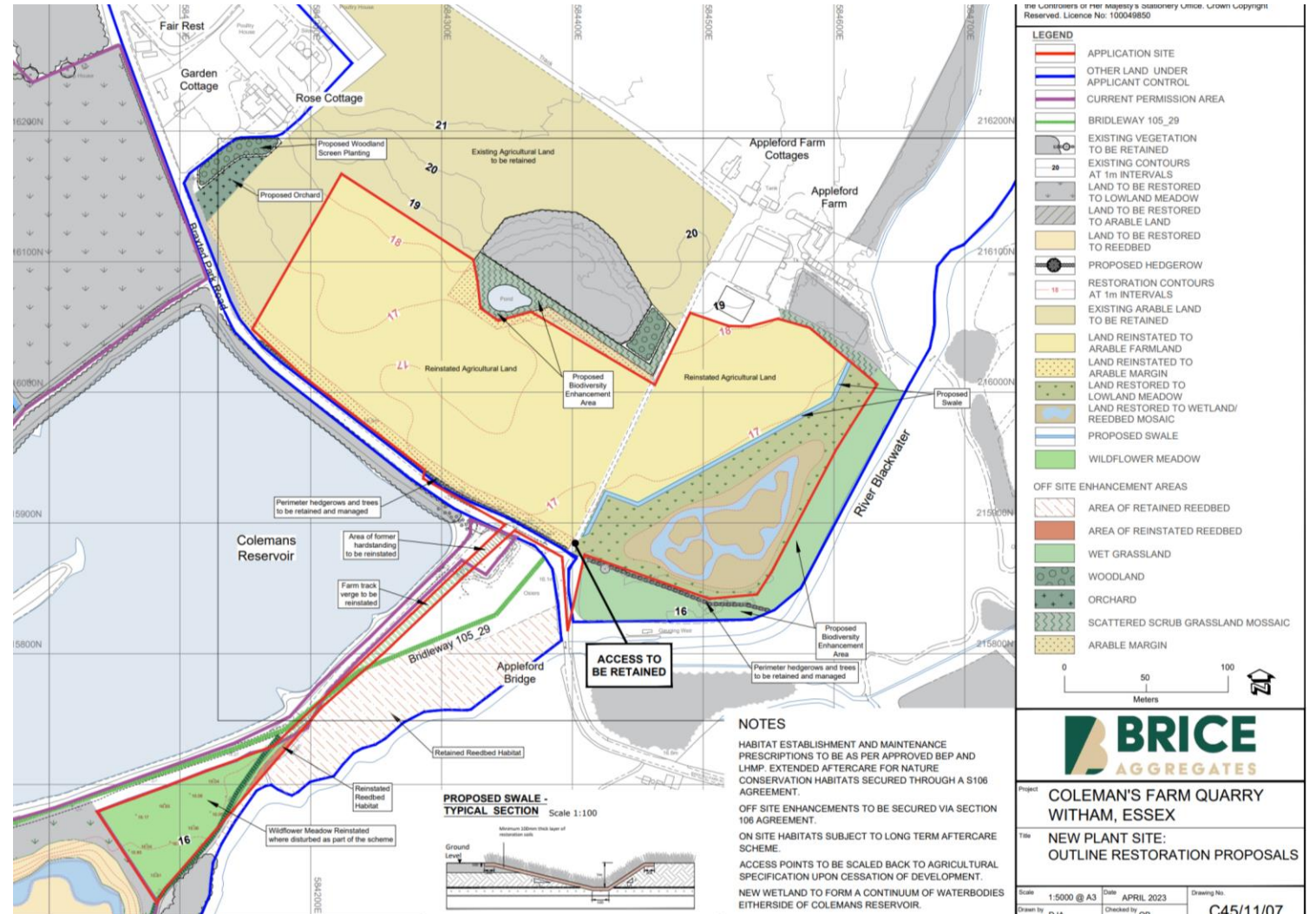
Brice Aggregates – Conveyor Belt & Processing

- **450m Conveyor Belt system and 9metre high bridge across Braxted Park Road**
 - Only be temporary, but now A50 proposed as a quarry
- **Does not currently have planning consent**
 - Witham Town Council have objected
 - Rivenhall Parish Council has objected
 - Braintree District Council has objected
 - Campaign to Protect Rural England has objected
 - Maldon District Council only speaks about mitigation
 - Great Braxted and Little Braxted need to object
- **Financial viability of a conveyor belt and bridge**
 - Other site allocations/ compensation maybe used to make viable



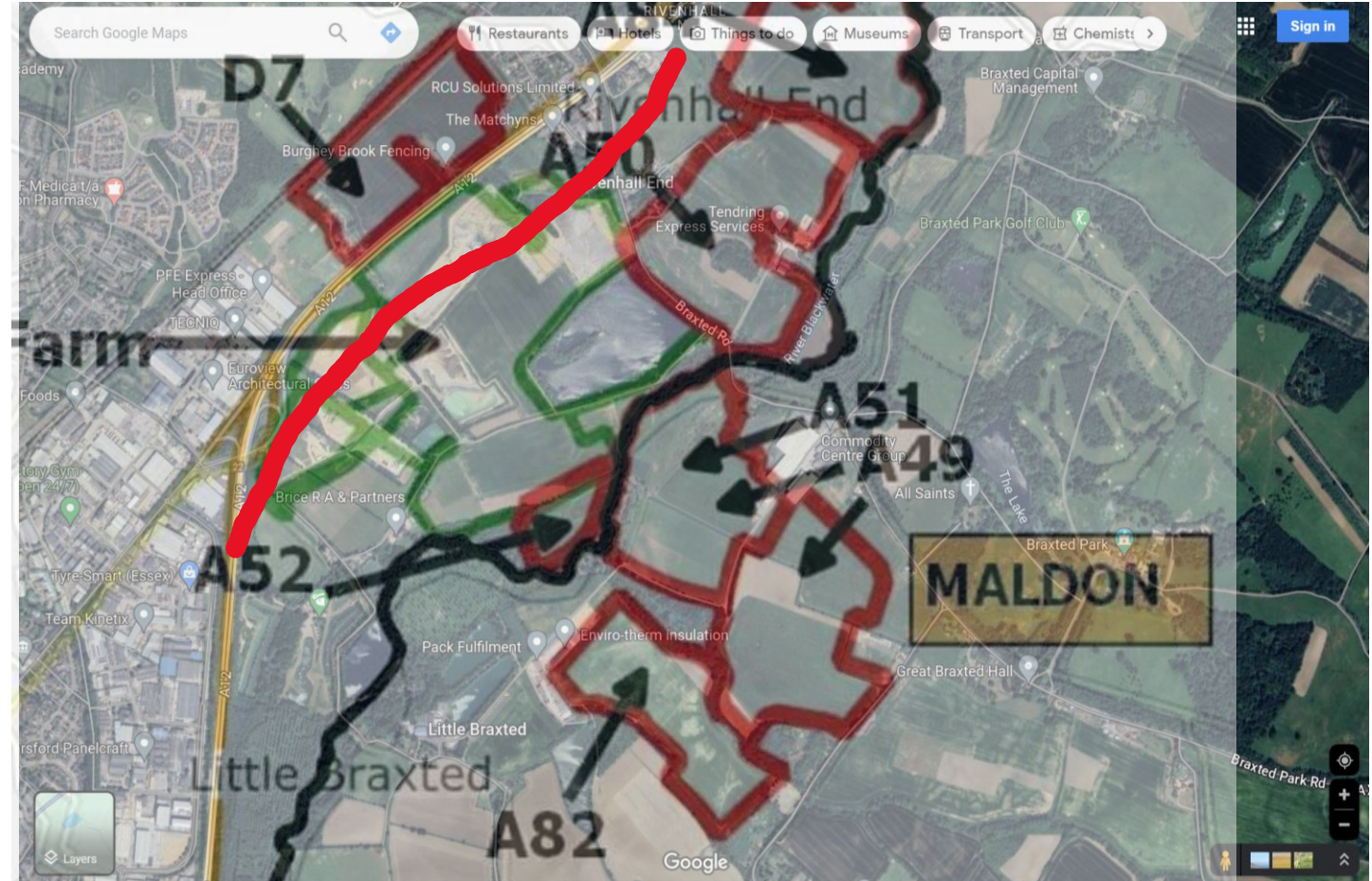
Brice Aggregates – Restoration Plan

- The restoration programme has already been delayed owing to the impact of the A12
- What will happen if site A50 is allocated as a new quarry?



A12 impact & Call for Sites Comparison

- New A12 route clearly has an impact upon current quarry
- Existing quarry is expansive – what evidence has been produced to rule out relocating current plant within existing site
- Processing plant relocating across Braxted Park Road – part of the proposed A50 allocation
- If A50 allowed, highly likely that this is not temporary at all
- Further delay to restoration



Braintree Council Objection

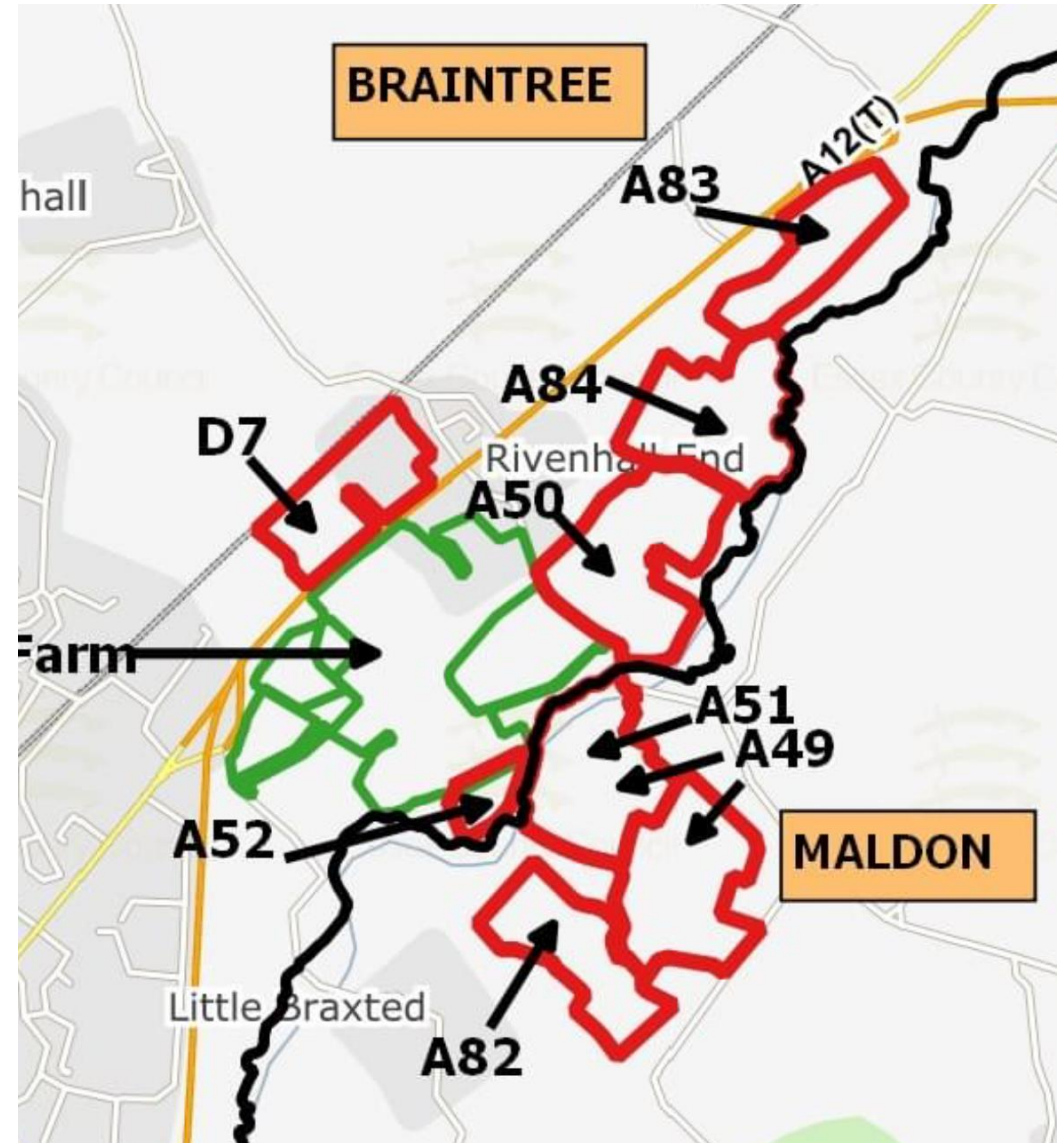
“At issues and options stage of the Minerals Local Plan, Braintree Council objected to the allocation of this site for mineral extraction. We wrote to you again at pre-submission stage to object to this allocation citing the impact on residents, local landscape, local environment and alterations required to public rights of way”

“We did not agree with the principle of minerals extraction works at this location due to impact on local landscape, the local environment and public rights of way. An increase in land take, which has not been assessed against other options, would exacerbate these issues and generate new impacts on air, noise, human health and local amenity as identified above...

....We also object to further expansion of the site on the grounds of adverse impact on landscape character and unnecessary use of best and most versatile agricultural land. As this expansion is onto unallocated land the applicant should be required to demonstrate that the development represents sustainable development and given the lack of assessment of alternative options, we are do not support this in principle.”

Essex County Council – Minerals Plan

- Minerals Plan Period 2025 to 2040
- 52 sites are under consideration by Essex County Council
- Consultation period ends on 19th March
- Each site has been RAG assessed and local councils and residents can now comment on the process and sites
- Brice Aggregates has written to Great Braxted Parish Council to confirm that **all the proposed extensions will link directly or indirectly to the proposed conveyor belt system!**
- **A network of overground conveyor belts and bridges over the River Blackwater and Braxted Park Road**



A50

- Mineral extraction within this location would **significantly alter the setting of the River Blackwater valley**, where a substantial buffer would be required.
- The Site is graded Amber because **ecological impacts could be moderate** and are likely to require medium levels of mitigation to make the Site acceptable.
- The Site contains Grade 2 quality soil (**very good quality agricultural land**) and Grade 3 quality soil (good to moderate quality land), which is BMV land.
- The Site has been identified as having a **‘high’ groundwater flood risk**.
- Archaeological evaluation has been completed across part of the Site which has identified concentrations of **archaeological remains**.
- In terms of visual impact, there would be a low level of harm (Amber) to the Grade II Listed Appleford Bridge resulting from the visual impact of the scheme.
- Environmental impact** on the bridge and its setting, resulting from **dust, noise, illumination at night and the movement of traffic**.
- Principle of access not agreed**.

Candidate Site Reference	Candidate Site Name	District	Existing use	Site Area (ha)	Potential Yield (million tonnes)
A50	Colemans Farm - Eastern extension (Appleford Farm)	Braintree	Agricultural	24.25	0.93

The Site is promoted as an extension to an existing mineral Site (Colemans Farm Quarry) and is located to the east of Colemans Farm Quarry. The Site area is approximately 24.25 ha and is proposed for 0.93 million tonnes of sand and gravel extraction which would be transported to an existing plant Site at Colemans Farm Quarry, where it will be washed, graded, and stocked prior to export off Site. It is proposed that once granted consent mineral extraction would follow on from the consented extraction activities at Colemans Farm Quarry. The adjoining uses include agricultural fields, woodland, Colemans reservoir, residential, farm and commercial buildings. The hamlet of Rivenhall is located 300m north and north east. Access to the Site is through the existing access into Appleford Farm. See Appendix J for a detailed map of the Site.

Summary of RAG Assessment

The results of the technical and desktop RAG assessment are detailed below.

Landscape and Visual Sensitivity	Biodiversity	Historic Buildings	Archaeology	Flooding	Transport	Access	Public Rights of Way	Geo-Environmental	Hydrology, Hydrogeology and Drainage	Air Quality	Soil Quality	Services & Utilities	Health & Amenity	Green Belt	Airport Safeguarding Zones
Amber	Amber	Amber	Amber	Amber	Red/ Amber	Red/ Amber	Green	Green	Amber	Green	Amber	Red	Red/ Amber	Green	Green

A52

- Appropriate consideration would be required to mitigate the physical impacts on The River Blackwater with a suitable buffer.
 - The River Blackwater is close to the Site’s eastern boundary creating a **potential pollution pathway for water quality** between the proposed mineral Site and a number of statutory wildlife sites.
 - The Site is graded Amber because **ecological impacts could be moderate** and are likely to require medium levels of mitigation to make the Site acceptable.
 - The Site is assessed as having a **‘high’ potential for surface water flood risk** as identified within the SFRA.
 - The Site has been identified as having a **‘high’ groundwater flood risk**.
 - The Site is predominantly **(95%) within FRZ3** and is therefore at **risk from fluvial flooding**.
-
- **Significance of flood risk raises question as to whether this might be used as a landing zone for a new bridge crossing over the River Blackwater – [MT Comment]**

Candidate Site Reference	Candidate Site Name	District	Existing use	Site Area (ha)	Potential Yield (million tonnes)
A52	Colemans Farm - Southern extension	Braintree	Agricultural	4.13	0.11

The Site is promoted as an extension to an existing mineral Site (Colemans Farm Quarry) and is located to the south of Colemans Farm Quarry. The Site area is approximately 4.13 ha and is proposed for 0.11 million tonnes of sand and gravel extraction which would be transported to the existing Colemans Farm Quarry plant Site, where it will be washed, graded, and stocked prior to export off Site. It is proposed that once granted consent mineral extraction would follow on from the consented extraction activities at Colemans Farm Quarry. The adjoining uses include agricultural fields and woodland. The town of Witham is located to the west of the Site. Access to the Site is proposed through the existing Little Braxted Lane access into, and internal haul roads through, Coleman’s Quarry. However, should A12 improvements be constructed, then access could potentially be via the proposed Braxted Road access. See Appendix J for a detailed map of the Site.

Summary of RAG Assessment

The results of the technical and desktop RAG assessment are detailed below.

Landscape and Visual Sensitivity	Biodiversity	Historic Buildings	Archaeology	Flooding	Transport	Access	Public Rights of Way	Geo-Environmental	Hydrology, Hydrogeology and Drainage	Air Quality	Soil Quality	Services & Utilities	Health & Amenity	Green Belt	Airport Safeguarding Zones
Amber	Amber	Amber /Green	Amber	Red/ Amber	Green	Green	Green	Green	Amber	Green	Amber	Amber	Green	Green	Green

A51

- The Site is significantly characteristic of the Blackwater/Brain/Lower Chelmer (C6) Landscape Character Area (LCA).....with open views of the river
- Mineral extraction within this location would **significantly alter the setting of the River Blackwater valley**, where a substantial buffer would be required.
- **Potential pollution pathway for water quality** between the proposed mineral Site and a number of statutory wildlife sites
- The potential for **Likely Significant Effects**, particularly to the Blackwater Estuary Special Protection Area and Ramsar site and the Essex Estuaries Special Area of Conservation
- The northern tip of the Site is adjacent to the Grade II Listed Appleford Bridge (List UID: 1111108). There is a **high degree of visibility** between the Site to the south and the heritage asset. The north-east boundary of the Site also abuts the curtilage boundary of the Grade II Listed Appleford Bridge Cottage (List UID: 1317172). **The harm resulting from the visual impact could not be effectively mitigated.**
- The Site is assessed as having a **‘high’ potential for surface water flood risk** as identified within the SFRA.
- **43% of the Site is within FRZ3 and FRZ2.**
- The Site has been identified as having a **‘medium’ groundwater flood risk**
- The Site contains Grade 2 quality soil (**very good quality agricultural land**) and Grade 3 quality soil (good to moderate quality land), which is BMV land.
- 1 Public Right of Way crosses the Site.
- The Site is within a **Drinking Water Safeguard Zone** (Surface Water) and is within **Drinking Water Protection Areas** (Surface Water).
- Prohibition of use of the bridge by HGVs needed to protect it

<i>Candidate Site Reference</i>	<i>Candidate Site Name</i>	<i>District</i>	<i>Existing use</i>	<i>Site Area (ha)</i>	<i>Potential Yield (million tonnes)</i>
A51	Colemans Farm - North extension (Hill Broad Farm)	Maldon	Agricultural	19.77	0.6

The Site is promoted as an extension to an existing mineral Site (Colemans Farm Quarry) and is located to the south west of Colemans Farm Quarry. The Site area is approximately 19.77 ha and is proposed for approximately 0.6 million tonnes of sand and gravel extraction which would be transported internally to the existing plant Site at Colemans Farm Quarry, where it will be washed, graded, and stocked prior to export off Site. . It is proposed that once granted consent mineral extraction would follow on from the consented extraction activities at Colemans Farm Quarry and, subject to allocation, could be operated alongside Site A50. The adjoining uses include agricultural fields, woodland, Colemans reservoir and residential and commercial buildings. The hamlet of Rivenhall is located 800m north of the Site. Access to the Site is through the access arrangements for the existing workings at Colemans Farm Quarry. See Appendix J for a detailed map of the Site.

Summary of RAG Assessment

The results of the technical and desktop RAG assessment are detailed below.

Landscape and Visual Sensitivity	Biodiversity	Historic Buildings	Archaeology	Flooding	Transport	Access	Public Rights of Way	Geo-Environmental	Hydrology, Hydrogeology and Drainage	Air Quality	Soil Quality	Services & Utilities	Health & Amenity	Green Belt	Airport Safeguarding Zones
Amber	Amber	Red/ Amber	Amber	Amber	Green	Green	Red/ Amber	Green	Amber	Green	Amber	Red/ Amber	Red/ Amber	Green	Green

A49

- The Site is very characteristic of the Blackwater/Brain/Lower Chelmer (C6) Landscape Character Area (LCA).....with open views of the river. Mineral extraction within this location would **significantly alter the setting of the River Blackwater valley**, where a substantial buffer would be required.
- **Potential pollution pathway for water quality** between the proposed mineral Site and a number of statutory wildlife sites. The potential for **Likely Significant Effects**, particularly to the Blackwater Estuary Special Protection Area and Ramsar site and the Essex Estuaries Special Area of Conservation
- The Site is graded Amber because **ecological impacts could be moderate** and are likely to require medium levels of mitigation to make the Site acceptable.
- The proposals are also just over **100 metres from Braxted Park Local Wildlife Site**.
- The allocation of The Site would have a **major detrimental impact** on the setting of the following Grade II listed buildings:
 - Appleford Bridge; Appleford Bridge Cottage and 1 and 2 School House
- There would be a **moderate impact on the significance of the Grade II listed Garden Wall** of Little Braxted Hall (List UID: 1111073),
- The Site lies within an area of archaeological features
- The Site is assessed as having a **‘high’ potential for surface water flood risk**
- The Site has been identified as having a **‘high’ groundwater flood risk**.
- The Site is predominantly within Flood Risk Zone 1 however parts of the Site within FRZ2 and FRZ3 associated with the River Blackwater are prone to **fluvial flooding**.
- 1 Public Right of Way crosses the Site.
- The Site is **within a Drinking Water Safeguard Zone** (Surface Water) and is **within Drinking Water Protection Areas** (Surface Water).
- The Site contains Grade 2 quality soil (very good quality agricultural land) and Grade 3 quality soil (good to moderate quality land), which is BMV land.
- 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.

Candidate Site Reference	Candidate Site Name	District	Existing use	Site Area (ha)	Potential Yield (million tonnes)
A49	Colemans Farm - Hill Broad Farm Full Site	Maldon	Agricultural	40.74	2

The Site is promoted as an extension to an existing mineral Site (Colemans Farm Quarry) and is located to the south east of Colemans Farm Quarry. The Site area is approximately 40.74 ha and is proposed for approximately 2 million tonnes of sand and gravel extraction which would be transported internally to an existing plant site at Colemans Farm Quarry, where it will be washed, graded, and stocked prior to export off Site. It is proposed that once granted consent mineral extraction would follow on from the consented extraction activities at Colemans Farm Quarry and, subject to allocation, could be operated alongside Site A50. The adjoining uses include agricultural fields, woodland, Colemans reservoir and residential and commercial buildings. The hamlet of Rivenhall is located 800m north of the Site. Access to the Site is through the access arrangements for the existing workings at Colemans Farm Quarry. See Appendix J for a detailed map of the Site.

Summary of RAG Assessment

The results of the technical and desktop RAG assessment are detailed below.

Landscape and Visual Sensitivity	Biodiversity	Historic Buildings	Archaeology	Flooding	Transport	Access	Public Rights of Way	Geo-Environmental	Hydrology, Hydrogeology and Drainage	Air Quality	Soil Quality	Services & Utilities	Health & Amenity	Green Belt	Airport Safeguarding Zones
Red/ Amber	Amber	Red/ Amber	Amber	Amber	Red/ Amber	Green	Red/ Amber	Green	Amber	Green	Amber	Red/ Amber	Red	Green	Green

A82

- The Site is significantly characteristic of the Blackwater/Brain/Lower Chelmer Valleys (C6) Landscape Character Area.
- **Public Rights of Way** (PRoW) run along the south-western boundary and to the north-west of the Site, with either occasional views into the Site or open views of the Site from the valley floor.
- The River Blackwater is situated 140 metres from the northwest of Site A82 and there are watercourses near to the Site’s boundaries which feed into the River. These create **a potential pollution pathway for water quality** between the proposed mineral Site and a number of statutory wildlife sites.
- Potential for **Likely Significant Effects**, particularly to the Blackwater Estuary Special Protection Area and Ramsar site and the Essex Estuaries Special Area of Conservation
- A section of **Elm Springs Woodland Priority habitat will require removal** to allow access from Site A49.
- The results of the assessment assume that **all materials would be transported via Site A49** and that there would be no Site access via Little Braxted Road (as proposed by the Site promoter). The **cumulative impact** of Site A82 and A49 is therefore an important consideration in this case.
- The Site is graded Amber because **ecological impacts could be moderate** and are likely to require medium levels of mitigation to make the Site acceptable
- The Site lies within an area **of archaeological features**
- The Site contains Grade 2 quality soil (**very good quality agricultural land**) and Grade 3 quality soil (good to moderate quality land), which is BMV land.
- Site is within a **Drinking Water Safeguard Zone** (Surface Water) and is within **Drinking Water Protection Areas** (Surface Water).

Candidate Site Reference	Candidate Site Name	District	Existing use	Site Area (ha)	Potential Yield (million tonnes)
A82	Colemans Farm – Elm Springs Extension	Braintree	Agricultural	15.42	1

The Site is promoted as an extension to an existing mineral Site (Colemans Farm Quarry) and is located south of Coleman Farm Quarry immediately adjacent to Site A49. The Site is proposed as a further extension (in addition to Site A49). The Site area is approximately 15.42 ha and is proposed for approximately 1 million tonnes of sand and gravel extraction which would be transported internally to an existing plant Site at Coleman Farm Quarry, where it will be washed, graded, and stocked prior to export off Site. It is proposed that once granted consent mineral extraction would follow on from the consented extraction activities at Coleman Farm Quarry and could be worked prior to Site A49. Infrastructure needed includes a field conveyor network/ADT compatible bailey bridge for transport of sand and gravel over the River Blackwater to the plant via Site A49. In addition, a supporting network of haul roads would be needed for the import of inert materials for the restoration of the Site. The adjoining uses include agricultural fields, woodland, a waterbody, and residential and commercial buildings. The town of Witham is located to the west of the Site. Access to the Site is through the access arrangements for the existing workings at Coleman Farm Quarry, including crossing over the River Blackwater via Site A49 for connection to the plant site. See Appendix J for a detailed map of the Site.

Summary of RAG Assessment

The results of the technical and desktop RAG assessment are detailed below.

Landscape and Visual Sensitivity	Biodiversity	Historic Buildings	Archaeology	Flooding	Transport	Access	Public Rights of Way	Geo-Environmental	Hydrology, Hydrogeology and Drainage	Air Quality	Soil Quality	Services & Utilities	Health & Amenity	Green Belt	Airport Safeguarding Zones
Amber /Green	Amber	Amber	Amber /Green	Amber	Green	Green	Amber	Green	Amber	Green	Amber	Amber /Green	Red/ Amber	Green	Green

General impacts to be considered

- Impact upon **health and amenity** owing to dust, noise and pollution
- Potential of local drinking **water pollution** - local properties have wells and no mains water
- Significant **flood risks** posed by each site and viability of extraction/ volume of extraction has to be questioned
- Significant **impact upon open countryside** and the setting of the **River Blackwater**
- Impact upon the **ecology of the River Blackwater corridor** – see next slide
- Loss of a **habitat expansion and protection zones**, connecting isolated areas
- **Impact upon local road networks** in terms of traffic, repair and maintenance resulting from lorries
- Direct **impact upon heritage assets** of Braxted Park, Appleford Cottage & Bridge, and the Old School House
- Permanent **loss of high quality farming land**
- **Red herring** that these sites will contribute to the requirements of the A12; they will be too late
- A51, A49 and A82's lack of proximity to the A12 project, when compared to other sites proposed
- **Potentially unviable Conveyor belt system and bridge** to a processing plant proposed on site A50
 - **Objections** from **Braintree District Council, Witham Town Council, Rivenhall Parish Council** and **CPRE**

Ecological Impact – protected species

- BBCG members have photographs of **otters** and they are very much associated with the River Blackwater.
- There is also a known record of a **Water Vole** at Benton Hall on the River Blackwater and it is thought that there are other populations along the river.
- **Swans** are often on the river and the areas of land when they flood.
- The area is home to large number of **reptiles**, **great crested newts** and other **invertebrates** etc
- **Dormice** have also been sighted nearby at Shutheath Woods and it is likely that there are populations near Braxted Park and the other woodland areas near the River Blackwater.
- Local people have also spotted **Kingfishers** along the River Blackwater, as well as Turtle Doves.
- Canada goose, grey squirrels, Muntjac Deer are also widespread in this countryside area.
- A lot of the above can be evidenced either directly via the community, or via Biodiversity Reports and research, such as that carried out by the Witham Bishops Parish in 2019.
- Speak to Dr Simon Lyster, Commissioner on the Essex Climate Action Commission and Chair of the Essex Local Nature Partnership.

Next steps....

- Further robust assessment needed to properly advise residents and respond:
 - Understanding of minerals demand and output/input of proposals
 - Comparison of potential site allocations against one another to assess likelihood
 - Timescales of quarrying activity and restoration – cumulative impact
 - Summary of increased HGV movements – Appleford Bridge etc
 - Extent of conveyor belt system and access arrangements
 - Bridge crossings over Braxted Park Road and River Blackwater
 - Volume of water needed for treatment, how it will be disposed of and settling ponds required
 -etc
- Need to appoint a professional consultant for representation – fee quote TBA
- Follow up residents meeting at 10:30am 9th March at Braxted Park Estate
- Consultation responses needed prior by the 19th March
 - Residents are encouraged to submit individual responses, aided by advice
 - It is my recommendation/request that Great Braxted Parish responds in it's own capacity to object
 - The consultation is split into two parts (i) The overall Minerals Plan policy proposals (ii) Individual sites proposed
 - These can be accessed using the following link:
 - [Essex Minerals Local Plan Review 2024 - Essex County Council - Citizen Space](#)