**Mineral Plan Review - Tony Dunn**

**(Chair Bradwell with Pattiswick Parish Council)**

1. This is the text extract of Tony’s presentation on 21st February. Text relating purely to sites in Bradwell itself has been omitted
2. Some of the content is very useful indeed in helping with responses.

**Grounds for changes to the Plan**

* **Methodology**
	+ Very weak on quantification of the problem or its solution
	+ Does not adhere to their own policies
	+ Strange supporting data
	+ Inconsistency between RAG status and justification
	+ Comment on individual policies
* **Site specific comments**
	+ Failure by applicants to adhere to policy
	+ Use direct comparisons to make assessments of A89, A92/3 worse
	+ Impact on local community
		- Noise
		- Dust
		- Odour
		- Traffic
		- Visual
	+ Cumulative effects
	+ Geographic distribution

**No quantified problem statement**

* 20 active sand and gravel quarries
* Existing 7 year landbank is >9 year landbank
* Previous forecast demand was for 4.31Mt per year
* Outturn sales was 3.44Mt per year
	+ Record of poor forecasting
* New forecast is 3.44Mt per year plus 20% => 3.98Mt per year
	+ **Plus 20% is to provide 150,000 homes for 166,000 people**
* No allowance for Policy S4 Reducing the use of Mineral Resource
* Forecast should be 3.44Mt +20%
* Windfall sites generated 13.69Mt over past 10 years
* Windfall sites eg agricultural reservoirs are increasing
* Existing landbank is fine
* Requirement is for 64.56Mt sand and gravel over next 15 years
* Make allowance for windfall sites 20Mt
* Make allowance for Policy S4
* Requirement is for <44.56Mt
* Extensions to existing quarries yields 94.2Mt
* If all sites granted yields 148.35Mt
* No need to allocate any new sites (Policy S9)

***Plan 3.1d) Protecting Amenities and Communities***

* *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.*
* “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.”

**Policy S2 - Strategic Priorities for Minerals Development**

* The Mineral and Waste Planning Authority will promote sustainable development by requiring new development, where relevant, to accord with the following principles:
* 2 Ensuring there are no unacceptable adverse impacts arising from proposed minerals development for public health and wellbeing, public safety, amenity, the quality of life of nearby communities, and the environment; “
* *Who determines what is acceptable and what is unacceptable? How is the local community involved?*

**Policy S4 - Reducing the Use of Mineral Resources**
**Policy S5 - Creating a Network of Aggregate Recycling Facilities and New Transhipment Sites**

* *This effect of policy S4* ***does not appear to have*** *been taken into account when determining the forecast demand for the period*
* *…the failure of the Plan to Quantify the issue of recycled aggregate even if only by copy of the data in the Waste Local Plan (2017) leaves the reader unclear as to whether more, and if so how much more, recycled aggregate will be required to meet policy S4*
* 3.76 The Waste Local Plan (2017) contains information relating to CDE arisings and management capacity. It would therefore be inappropriate for this Plan to set a numerical policy target for aggregate recycling capacity in the County during the plan-period of this RMLP, or to identify any site-specific proposals for new aggregate recycling facilities.
* *Some context would be helpful, for example, in the overall consumption of aggregate / sand and gravel what proportion is currently CDE. What is the profile of aggregate recycling capacity if no additional sites are granted and existing sites cease production when their temporary licences expire?*

**LANDSCAPE CHARACTER**

Descriptors and Ratings used

* The Site possesses few characteristic features **Red/Amber Green/Amber**
* The Site possesses some characteristic features **Amber**
* The Site possesses few characteristic features **Amber**
* The Site is very characteristic **Red/Amber**
* The Site comprises several characteristics **Green/Amber Amber**
* The site comprises a number of distinct characteristic features
* **Green/Amber Amber**
* The Site bridges two Landscape Character Areas (LCA), and possesses features of both areas **Green/Amber Red/Amber**
* Potential impacts to the River Blackwater and its associated riparian habitats. Site could have major impacts upon irreplaceable habitats. **Red/Amber**

Descriptors and ratings used on the sites

* A89 The Site bridges two Landscape Character Areas (LCA), and possesses features of both areas. Graded **Green/Amber** Similar elsewhere graded **Red/Amber**
* A92/3 potential impacts to the River Blackwater and its associated riparian habitats. Site could have major impacts upon irreplaceable habitats, **Red/Amber**
* 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.
* **Green/Amber** … should be at least **Amber** or probably **Red/Amber**
*
* A92/93 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.
* 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 Site and include several ancient woodland Local Wildlife Sites.
* **Red/Amber** Agreed

**A89 Covenbrook Hall Farm**

2.45Mt **over 23 years** is approx. 100,000 tonnes per year.

13 x 40 tonnes HGVs per day plus the vehicles of the people operating the extraction and

processing plant

*Emphasis needs to be placed on the moderate impact upon Priority habitats and species.*

*This includes the direct loss of an ancient hedgerow with a mature tree, and loss of the*

*central broadleaved plantation woodland and a small section on western boundary.*

*Potential hydrological impacts to retained habitats, and loss of- and disturbance to- habitats*

*for Priority farmland species.*

**Covenbrook Hall Farm A89 – Transport**

* *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.”
* **Red/Amber** should be **Red**
* *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 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.*

**Pattiswick Hall Farm A92/93 - Transport**

* 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.
* “3.195  It will continue to be unacceptable for new junctions to be created straight onto a trunk road”

**A92 (A93) – Cropmarks**

“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.”

‘Non-designated’ heritage assets which are of significant local importance and require ongoing protection and enhancement**: Bradwell with Pattiswick Neighbourhood Plan (2019)**

**Pattiswick Hall Farm**

“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.

**Cumulative impacts**

* *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.***

**GEOGRAPHIC DISTRIBUTION**
307 civil parishes in Essex

6 of 52 sites are in or adjacent to Bradwell with Pattiswick.

3 of the 52 sites are in or adjacent to Stisted.

Overall a high concentration given the small area covered.

Much of North Essex has viable sand and gravel deposits.

Does not tally with statement below contained within the Plan

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