

Candidate Site Assessment

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, application of criterion and, the comments supporting the assessments. A couple of non-site specific examples are shown below which demonstrate the inconsistencies where differing RAG assessments have been used.

The Site possesses few characteristic features **Red/Amber** **Green/Amber**

The site comprises a number of distinct characteristic features **Green/Amber** **Amber**

Site specific comments RAG assessments are discussed below.

Yield and Next Steps

Do you have any comments on this section?

Yes

Comments

We have found it difficult to reconcile the forecasts given in Policy S6 of the other paper are which are explored in our comments for this policy in our response to the Essex Minerals Local Plan Review

We have studied the various documents published and calculate the sum of yields declared to be over 140M tonnes. We have been unable to pin down a precise figure. While there will be an element of double counting, we cannot get close to reconciling the figure of 117.55m tonnes as given in the Plan.

We calculate that the yield declared for extensions to existing sites amounts to 94.42m tonnes which appears, to obviate the need for new sites to be opened.

A89 Covenbrooke Hall Farm - Stisted

1. Transport & Access

While A89 is immediately adjacent to the A120 (National Highway) with a capacity of 18,000 daily vehicle movements. The current position is that there are between 25,000- 30,000 daily movements. Dramatically above the current capacity. This is not taking into account the extra movements that will be generated by the development of the Incinerator at Bradwell east of the site.

This stretch of the A120 cannot possibly cope with addition daily movements especially from lorries carrying heavy loads.

Local traffic police regard A120/Kings Lane junction as an accident black spot, this is also recognised by National Highways who have shared their concerns over this junction as recently as February 2024

Data from Crash Map confirms that on the stretch of the A120 from Marks Farm in Braintree to Marks Tey there is a higher concentration of incidents at this junction. However, only incidents that required the presence of the emergency services are recorded. In 2022 (the latest data available) there were 5 such incidents recorded whereas in the 3-year period June 1986 to May 1989, there were only 5 incidents recorded. This reflects the trend in the increasing number of incidents over time, which can only be a reflection on the higher use of the A120.

Unfortunately, there is no readily available record of all incidents, for instance, no data from insurance companies.

The Crash Map data also reveals that there are other significant areas where there is a high concentration of incidents on the A120, e.g. Marks Farm roundabout (400m to the west), eastward, the entrance to the garden centre, the junction with Water Lane, junction with The Street at Bradwell and, close to the existing entrance to the quarry east of Bradwell.

Kings Lane is an obvious country lane and is the main access to the village of Stisted. Besides the residents, the lane is also used for access to the Village School, Golf Club, Nursing Home including ambulances, local farms, businesses and, deliveries which have increased due to the rise on on-line shopping.

Kings Lane is often used as a cut through and rat run, including HGVs and lorries when there is traffic congestion and blockages mainly due to road collisions on both the A120 and A131 that runs along the west of the village.

Kings Lane is totally unsuitable as an alternative route when an incident occurs on the A120. As a consequence, a large number of lorries and HGVs using Kings Lane prevent the flow of traffic with many driving on soft verges and into ditches leaving severe damage to road edges and margins. With increased HGV and lorry movements due to the Incinerator at Bradwell and any increase in traffic caused by new quarry sites, this situation will only become much worse

With an expected yield of 2.45m tonnes over a 23-year period, this would result in 106,000 tonnes pa or 532 tonnes per day assuming 200 days per year working. Using an average load of 25 tonnes, this means 21 daily loads or 42 traffic movements to include return trips, or 6 movements per hour based on a 7-hour working day. These figures do not include vehicle

movements by employees to and from the site as well as associated service vehicles such as fuel deliveries.

Access from A89 to the A120 (National Highway) is proposed to be via Kings Lane. Any access point onto Kings Lane will necessitate the part removal of a well-established line of trees on the east side on Kings Lane. The A120 follows the line of Stane Street, a roman road that linked Colchester to St Albans.

Exit from Kings Lane onto the A120 is by way of a steep incline that exists up to the national highway. The incline is more than sufficient to severely impede the acceleration of full gravel/sand lorries (slow enough even on a flat lane). In all likelihood the slope would not enable sufficient speed to be generated to enable movement on to the A120 in a safe and speedy manner.

Kings Lane itself is an ancient lane that has existed for some 1000 years or more linking the village and water mill on the Blackwater to Stane Street. The presence of a mill is recorded in the Domesday Book.

Kings Lane is an ancient country lane of considerable age with any alteration to it will lead to the disappearance of its existing ancient and rural character.

Change from Red Amber to Red

2. Landscape and Visual Sensitivity

a. General

The sites lie in a rural area forming an integral part of attractive open countryside that promotes the feeling of space

If workings were to be permitted on this site, they would inevitably be on a scale that the appearance of the countryside would be not only seriously damaged but dramatically changed.

There are a number of well used footpaths running along or across the site. A89 site is very prominent in its immediate locality and in visual terms makes for an effective contribution to the existing very attractive landscape.

The footpaths afford many views, both close and distant, across sloping and open countryside to the principal landmarks of the village of Stisted and its environs. These include Grade II listed buildings such as Stisted Mill, Stisted Hall also including the parkland which is now used by Braintree Golf Course, Jenkins Farmhouse and adjoining converted barns.

The site will be visible with varying degrees of prominence from many locations both near and far thus adversely affecting the existing open and tranquil landscape with its sense of space.

b. Key landscape characteristics

The site bridges two special landscape areas (SLA). There can be no doubt whatsoever that mineral workings on a large scale will have a serious visual impact on the SLA and

considerable weight should be given to the serious effects which the proposed site will have upon it.

The site is an important part of the rural setting where the pattern of fields, hedgerows and old trees have changed little over the centuries and give a great sense of time depth to the landscape.

Grade II Listed buildings (Jenkins Farmhouse and converted barns) are located close to the northern boundary which add to the strong time depth.

The footpath that runs along the northern boundary of the site is used frequently by dog walkers mainly from outside the village. The site provides the first sense of open space and tranquillity within the village boundaries. This is a popular footpath used by walkers coming from the east side of Braintree. This was particularly so during COVID lockdowns. The sense of space, presence of open fields and tranquillity would have been a great boost to mental well-being at that time and continues to be so to this day.

The positive contribution to local landscape character, emphasises its strong historic relationship of village to its rural setting; part of open rural approach to village.

It is clear the site will be visible in varying degrees from both near and far thereby making an effective contribution to the existing landscape. The site is visible from the A120 through the sparse tree line, The ridge on which the site is located is visible from the north side of the Blackwater valley.

Any planting to provide screening of the site will have a long-lasting detrimental impact on the landscape which, as mentioned previously, is typified by open attractive countryside that gives a true sense of space and tranquillity. The site is in many respects one of the first such areas located moving northward through the county from its more urbanised south

The main feature of this landscape is the openness and space it delivers with long distance views of Stisted, outlying settlements and their environs. All of this would be irreparably damaged and lost to any planned structural planting that would create false features and be totally out of place in a landscape that has altered little over the centuries. It is difficult to see how any planting can totally screen the site from adjacent properties or viewing points on more distant PRowS, lanes and, roads.

c. Key visual characteristics

The present views of A89 are of a large arable field on a distant ridge line whereas in the future any visual or noise screening will create an impression of unnatural artificiality. This will be particularly apparent from the Stisted Hall area, Braintree Golf course clubhouse and from many points on the course itself. There are also well used PRowS that run along the boundary of the course.

A89 is very prominent in its immediate location and in visual terms makes an effective contribution to the existing very attractive landscape. The site affords distant views Stisted Mill, Stisted Hall and parkland, now used as a golf course and help place and help place these in their historic context. The adjoining Jenkins farmhouse and 3 converted barns (all grade II listed buildings) provide a more immediate landscape and historic context.

The site has a visual influence on wider landscape providing a positive contribution to the rural setting of Stisted; and its strong sense of place.

The current very pleasant views into the countryside and fields into the site from PROWs, lanes, and roads, will be completely transformed. The footpaths that cross or border the site are well used and have been in existence beyond current memory, coupled with the thousands of daily users of the A120 and Kings Lane, means that any mineral workings and associated screening will have a considerable visual impact on an extremely large number of people.

The site lies in a rural area forming an integral part of the attractive open countryside. Mineral workings would not only seriously impair, but also, dramatically change the appearance of the countryside.

Any mineral workings will have a very serious visual impact on the SLA. For instance, while there is a strip of trees along the northern edge of A89, the Blackwater valley and the village of Stisted are still clearly visible, even in the summer months, from Footpath 21.

Any structural planting on A89 will transform the nature of the landscape in which they are situated and destroy the current open appearance of the countryside.

Change from Amber Green to Red Amber

3. Settlements

There are a number of settlements that are in close proximity to A89. 4 grade II listed properties are in very close proximity to the NW corner of the site. There are a number of other well-established dwellings that are either located on the boundary to the site or across the A120 and Kings Lane. While these have been acknowledged in the assessment, the traveller and gypsy site at Twin Oaks located on the A120 south of the site has not been acknowledged. As such their amenity, well-being and, interests appear to have been ignored. With around 40 pitches on Twin Oaks there must be well in excess of 100 residents who are part of a protected group under the Equalities Act 2010

Health and Amenity – No change from Red

Soil and Land Use

In the overall public interest, it would be reasonable to expect there will be less damage to the environment resulting from extensions of existing workings rather than opening virgin sites.

Mention is made that all sites under consideration are stated as being temporary with many of them expected to be used more than 20 years. Allowing for site preparation and appropriate restoration within a reasonable (no time given for this aspect) It could well be more than 30 years before the land is restored to its former agricultural quality. This represents a loss of amenity for an unacceptably long period of time and does seem to overstretch the meaning of the term temporary. It would be fair to say that these sites will be lost for a generation, as 30 years is often used as the standard measure for this length of time

Currently there are no site-specific proposals for restoration post extraction. Therefore, there is a possibility that the site may not be restored to its current status as Best and Most Versatile (BMV) agricultural land and could well be used for other purposes such as landfill or built development.

In the government's "A Green Future: Our 25 Year Plan to improve the Environment", it clearly states that the plan is to, protect the best agricultural land, put a value on soils as part of our natural capital, and manage soils in a sustainable way. The land at A89 is Grade 2 agricultural land i.e. BMV. Whilst it is stated that soils will be stored once removed from a site, there is no guarantee that such soil will be reinstated on the site at a later date

The National Planning Policy Framework (NPPF)

The NPPF sets out how planning decisions are made about the natural environment to: protect and enhance landscapes, biodiversity, geology and soils, recognise soils a natural capital asset, consider the economic and other benefits of BMV agricultural land, and try and use areas of poorer quality land instead of higher quality land, prevent soil, air, water or noise pollution.

Planning policies and decisions should also ensure that new development is appropriate for its location taking into account the likely effects (including cumulative effects) of pollution on health, living conditions and the natural environment, as well as the potential sensitivity of the site or the wider area to impacts that could arise from the development.

The focus of planning policies and decisions should be on whether proposed development is an acceptable use of land. This does need to be given serious consideration in respect of A89

Food Security

Food security is rapidly becoming a hot topic with farmers, food producers and UK government. Shortages of various foodstuffs that are imported from major food producing countries are becoming more frequent due climate change having a major impact on weather patterns. The NFU national conference 20 and 21 February 2024 centred on improving UK food production and food security. It does seem very illogical to remove high quality agricultural land from food production during a looming crisis in the UK's food security.

"Food security is a vital part of our national security and recent years have brought home the truth of that." "We'll never take our food security for granted". Rishi Sunak: National Farmers' Union (NFU) conference 20 February 2024

Change from Amber to Amber Red

4. Noise and Air Quality

The landscape from the south of the parish through which the A120 runs (National Highway) up to the core village is open and provides for no natural barrier to noise and dust pollution.

Traffic noise from the A120 can be heard most days when standing by the parish church which is located nearly 1½ miles away from the road. The noise is more noticeable in those properties located to the south of the core village. The prevailing wind is from the west to the south west however, the direction often changes to being from south or south east as wind flows over the Blackwater Valley. Noise from any of the potential quarry sites will carry across the open landscape into the core village with a resultant negative impact of on well-being of residents due increased levels of noise.

The most harmful impact of the increase in noise will be on those residents that live close to or border the proposed site such that if it were to be worked there will be a negative impact on their well-being.

There can be no argument quarries create dust, which includes harmful particulates that cannot be detected with the naked eye. Given the prevailing wind, airborne dust will be carried from the site across the open landscape and into the village core and neighbouring properties.

Silica dust released during the extraction of gravel poses a significant risk to the health of our community. Silica (quartz or silicon dioxide) is classified as a human carcinogen and exposure to silica dust poses a major health risk which is particularly dangerous to children and older people.

Due to the potential small size of crystalline Silica, it can enter the lungs and lodge there, causing permanent lung damage or potentially cause cancer. Prevailing winds can carry this fine silica over a wide distance. Therefore, the risk of inhalation is increased when quarries or gravel pits are sited near communities. The closer communities are to the source, the higher the concentration and danger.

The following health problems have been significantly linked to proximity to silica either as a worker or by communities sited close to the extraction sites. These include silicosis, lung cancer, tuberculosis, and increased lung irritation. Fundamentally we currently do not have a cure for silicosis; once these fine particles enter the lungs, the body has no means to expel them.

With longer, hotter, and drier summers being forecast, the enjoyment of fresh air we breathe could no longer be taken for granted. This situation will impact negatively on the well-being of residents, especially on those who suffer from respiratory disorders. It would not be too drastic to say that those living close to the site may have to keep windows and doors closed with children not being able to enjoy being outdoors in gardens, the Village playing field and school playground.

Change from Green to Amber. Change to Red Amber for those living within 250m

5. Biodiversity

Within the site there are a number priority habitats, ancient hedgerows and, ancient trees. All of these are considered to be irreplaceable natural heritage assets. How can an ancient hedge line or oak tree be restored to a site once it has been removed. Quite simply, these assets cannot be restored. Once removed they are lost forever. There is reference to restoration without any detailed proposals. For instance, there is the proposed removal of an ancient hedgerow and prominent mature oak tree from the middle of A89. Clearly, but for mineral workings, there would be no need to remove this ancient hedgerow which such an attractive feature of the landscape.

A89 bridges two Special Landscape Areas. The working of A89 would impact negatively on the priority habitats and species found in these which can never be adequately restored and their characters will be changed permanently.

Extraction workings could well result in water table drawdown and the interception of ground water flows which in turn could impact on springs and streams. This would have impacts on neighbouring stretches of woodland, hedges and ponds resulting from inadequate water flow especially during the increasing drier and hotter summers we are forecasted to experience.

The management of hydrology must be called into question. We are experiencing warmer and wetter winters with increasing levels of rainfall and frequency of flooding only occurred previously on rare occasions.

No mention has been made concerning containment of contaminated water on the site. A89 is on top of a ridge sloping north down into the Blackwater valley. Any excess water can only flow downward into watercourses towards the river causing harmful sediment to build up caused by polluted water with the net result being, harmful damage to habitats and overall biodiversity

The present landscape cannot manage the current levels of water now being experienced during our wetter winters. One must question the ability of existing flood management measures in being able to manage the excess water generated by extraction workings and processing

Without these workings the ecology of A89 would remain undisturbed in the natural state that has been formed over a considerable length of time. There is no guarantee that any disturbance to this can be remedied by way of restoration measures within an acceptable time frame.

Change from Amber Green to Amber

We urge Essex County Council's planning officers to give due consideration to our concerns in your deliberations