

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.

A92 Pattiswick Hall Farm – Small Site

A93 Pattiswick Hall Farm – Full Site

1. Transport & Access

While A92 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 South of the sites.

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

Data from Crash Map confirms that on the stretch of the A120 from Marks Farm in Braintree to the proposed access onto the national highway from the sites, that there is a high concentration of incidents. However, only incidents that required the presence of the emergency services are recorded. The number of such incidents has increased over the years

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, junction with Kings Lane, 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.

The lanes running off the A120 are 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 Stisted.

These lanes are totally unsuitable as an alternative route when an incident occurs on the A120. As a consequence, a large number of lorries and HGVs using the lanes 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

A92

With an expected yield of 3.4m tonnes over say a 20-year period, this would result in 170,000 tonnes pa or 850 tonnes per day assuming 200 days per year working. Using an average load of 25 tonnes, this means 34 daily loads or 68 traffic movements to include return trips, or about 10 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.

A93

With an expected yield of 8.2m tonnes over say a 20-year period, this would result in 410,000 tonnes pa or 2,050 tonnes per day assuming 200 days per year working. Using an

average load of 25 tonnes, this means 82 daily loads or 164 traffic movements to include return trips, or about 23 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 A92 and the adjoining A93 to the A120 (National Highway) is proposed to be by way of a new access point which would be contrary to National Highways policy, a point that has been conceded in the assessments.

No Change - 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 any of the sites, 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 sites. Each site is very prominent in its immediate locality and in visual terms make 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, the Grade I listed Church, Grade II listed buildings such as Stisted Hall also including the parkland which is now used by Braintree Golf Course, Old Flint Almshouses and the skyline of The Street with its many listed buildings and distinctive chimneys.

The sites 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

Both sites comprise of an open arable valley that slopes gently towards the River Blackwater. In respect of A93, there are strong views back to Stisted (Sarcel) and church from facing slopes with views over a wooded tributary

There exists a strong time depth typified by historic field patterns, mature trees, and hedgerows. Public footpaths lead down slope to valley bottom which also provides for a sense of space and high tranquillity.

The open countryside provides a positive contribution to local character, a strong sense of place: that emphasises the strong historic relationship of Stisted and Pattiswick to their rural setting; and open rural approaches to both villages

There can be no doubt whatsoever that mineral workings on a large scale will have a serious visual impact on the open and pleasant countryside and considerable weight should be given to the serious effects which the proposed sites will have upon it.

The sites are 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.

There are number of Grade II Listed buildings located within or close to both sites which add to the strong time depth.

The number of footpaths that runs along boundaries and within both sites are used frequently by dog walkers mainly from Stisted and Pattiswick. The site provides the sense of open space and tranquillity within the boundaries of both villages. 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.

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 sites are in many respects one of the first such areas 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 and Pattiswick, 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.

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.

c. Key visual characteristics

A92 and A93 are very prominent in their immediate location and in visual terms make an effective contribution to the existing very attractive landscape. The site affords distant views of both Stisted, Pattiswick and, many outlying settlements

The site has a visual influence on wider landscape providing a positive contribution to the rural setting of Stisted and Pattiswick; and their 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 sites are well used and have been in existence beyond current memory, coupled with the

thousands of daily users of the A120, Water Lane and, Doghouse 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 structural planting on A92 and A93 will transform the nature of the landscape in which they are situated and destroy the current open appearance of the countryside.

Views from the east of Stisted look down and across both sites and would appear to be impossible to mitigate or screen the visual impact of any workings.

No Change - Red Amber

3. 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 sites 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 A92 and A93 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 A92 and A93

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 the 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 sites such that, if they 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 sites 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

On both sites 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. There is the proposed removal of ancient hedgerows from both sites. Clearly, but for mineral workings, there would be no need to remove these ancient hedgerows which are such an attractive feature of the landscape.

Both sites have features characteristic of two Special Landscape Areas. The working of both A92 and A93 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 forecast 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 sites. A92 and A93 comprise of sloping farmland that runs south down towards the Blackwater valley. The river is located to the south of the A120. Any excess water can only flow downward into watercourses towards the river causing harmful sediment to build up within

them 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 A92 and A93 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.

No Change Red Amber

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