

Stisted Parish Council

Response to Essex Draft Minerals Local Plan

Section 1.0 - Plan Introduction

1. Do you agree or disagree with this section?

Agree

2. Do you have any comments on the Introduction?

This is a very textual start to the plan that does not quantify the projected demand for sand and gravel over the 15-year period or summarises the actions that need to be taken to meet the demand. A good case in point is 1.15 “The Mineral Supply Hierarchy” where the use recycled minerals is mentioned but there is no indication as the extent to which they will contribute the overall demand. The reader must go beyond page 50 before the demand is quantified.

Section 2.0 - Spatial Portrait

1. Do you agree or disagree with this section?

Disagree

2. Do you have any comments on the Spatial Portrait?

The population of Essex in 2021 was 1.5 million people. The population of Essex is expected to increase to 1,666,077 by 2043/4. This is an increase of 166,077.

Local Authorities are preparing Local Plans to deliver 150,500 new homes in Essex up to 2036. This is equivalent to nearly one new home for each new resident in the county. Quite clearly the figures here are at odds with each other.

It is given that each new home consumes an average of 60 tonnes of minerals, that equates to just over 9m tonnes required to build the planned 150,500 new homes. With a projected demand of around 64m tonnes covering the period of the plan this does seem to imply a major over-estimation or a very significant increase in new commercial development and publicly funded infrastructure. Furthermore, there is no allowance made for the use of recycled minerals or windfall gains within the figure for projected demand

The plan places great emphasis on the need for minerals to deliver the planned new homes to be built in the county however, as mentioned above the figures do not stack up.

It is stated that 86% of the land area is productive farmland as indicated on the maps. Half of this land is graded as Grade 1, 2 or 3.1 i.e. is of high quality. This implies that the half of this land is of lower quality and it would appear to make sense that such land be prioritised. This is particularly important given that UK food supply security is being given great prominence at the current time.

Section 3 – The Strategy - Aims, Strategic Objectives and Spatial Priorities

1. Do you agree or disagree with this section?

Agree

2. Do you have any comments on the spatial vision, aims, strategic objectives, and spatial priorities?

In most respects we agree with this section. However, we have identified a few points that need to be addressed.

"Mineral developers will engage with communities to create the most appropriate local solutions."
Mineral developers who do not / have not engaged with their local community should be struck off the list of potential sites. In respect of sites A89, A92 & A93 there has been no engagement with the local community thus far.

No account has been made to quantify the potential for re-use and recycled minerals together with the absence of any provision for windfall gains, once again calls into question the validity of the projected demand. The availability of minerals from these sources should significantly reduce the demand for mineral extraction.

"Promoting the mineral supply hierarchy to reduce the need for the primary extraction of minerals."
The Plan then produces a straight-line forecast based on a moving average PLUS 20% - this does not produce a reduction and is counter to the statement made in the plan

Presumption in Favour of Sustainable Development (Including Policy S1)

1. Do you agree or disagree with this Policy S1?

Agree

2. Do you have any comments on Policy S1?

This policy is basically in accordance with national policy. However, there should be a balance between the applicant and the local community which is impacted by the mineral development. The wording of this policy implies that the MPA will favour applicants over the local community which is impacted by the development. This policy therefore, is in contradiction with policies S10 and DM1.

Strategic Priorities for Minerals Development (Including Policy S2)

1. Do you agree or disagree with Policy S2?

Agree

2. Do you have any comments on Policy S2?

While we are in general agreement with the 9 strategic criteria for mineral development however, we do wish to raise the following points.

If geological factors dictate that mineral extraction is concentrated in central and northern Essex, why are those areas not protected from other forms of development to prevent damage to the environment and residents? For example, the Rivenhall Incinerator is in close proximity to 6 of the potential sites which, if gravel extraction were allowed, would very likely lead to intolerable air pollution to residents.

Within the criteria reference to terms such as unacceptable and relevant are used. Who determines what is acceptable/unacceptable and what is relevant/ irrelevant? Will the affected community be consulted?

Climate Change (Including Policy S3)

1. Do you agree or disagree with Policy S3?

Agree

2. Do you have any comments on Policy S3?

While this policy is good however, there is no indication of any mechanism that ensure that developers will adhere to the policy or be penalized if they do not.

Reducing the Use of Minerals (Including Policy S4)

1. Do you agree or disagree with Policy S4?

Agree

2. Do you have any comments on Policy S4?

No problem with the general thrust of the policy however, the effect of this policy does not appear to have been taken into account when determining the estimated demand for the period. There is no comment as to the expected level of contribution by the use of recycled minerals to the estimated overall demand

Creating a Network of Aggregate Recycling Facilities and New Transshipment Sites (Including Policy S5)

1. Do you agree or disagree with this Policy S5?

Agree

2. Do you have any comments on Policy S5?

As with policy S4 there is no attempt to quantify the estimated level of recycled minerals and therefore how much more is required to meet that policy. There is no indication as to the current status of the present facilities in use and to what extent new facilities will need to be opened.

General Principles for Sand and Gravel Provision (Including Policy S6)

1. Do you agree or disagree with Policy S6?

Disagree

Do you have any comments on Policy S6?

The main issue here is the basis on which the estimated demand for minerals has been calculated over the life of the proposed plan. The requirement for 64.56 m tonnes of minerals over the next 15 years appears to follow national policy but does not take into account local factors.

The impact of windfall sites, mainly agricultural reservoirs, are not mentioned. Over the past 10 years these have generated 13.69 m tonnes of minerals. Extrapolating this figure to cover 15 years, this would give a potential windfall of around 20m tonnes. Furthermore, no allowance has been made for the use of recycled minerals in the calculation for the overall demand and is in conflict with Policy S4.

Therefore, the net requirement for minerals from new sources, using the figures above, would appear to be below 44.56m tonnes. Given that extensions to existing quarries with the necessary infrastructure already in place are estimated to yield 94.2m tonnes, there would appear to be no need to open any new sites. This would be in line with policy S9

Provision for Industrial Minerals (Including Policy S7)

1. Do you agree or disagree with Policy S7?

Agree

2. Do you have any comments on Policy S7?

No comment to make

Safeguarding Mineral Resources and Avoiding their Sterilisation (Including Policy S8)

1. Do you agree or disagree with Policy S8?

Agree

2. Do you have any comments on Policy S8?

No comment to make

Safeguarding Mineral Extraction Sites and Other Mineral Infrastructure (Including Policy S9)

1. Do you agree or disagree with Policy S9?

Agree

2. Do you have any comments on Policy S9?

While the draft Plan states that no site allocations have been made, this policy makes clear that existing sites and extensions to existing sites will be favoured over brand new sites. This is backed up by the our comments in respect of policy S6. For continuity of employment, to allow existing contractors certainty that they can realise their investment and to maintain good relations with the industry and the community this approach is welcomed.

Protecting and Enhancing the Environment and Local Amenity (Including Policy S10)

1. Do you agree or disagree with Policy S10?

Agree

2. Do you have any comments on Policy S10?

There is no indication given as to what mechanism would be employed to ensure how this policy will be monitored or, when the need arises, be enforced.

Who defines "unacceptable" in the context of adverse impacts? How is the local community to be involved?

Access and Transportation (Including Policy S11)

1. Do you agree or disagree with this Policy S11?

Agree

2. Do you have any comments on Policy S11?

This policy is supported provided recognition is given to the wider issue of highways capacity especially with regard to the local and strategic road network. This is particularly relevant in respect of the A120 (National Highway) where it runs east from Braintree to Marks Tey. This stretch of the A120 is single carriageway with a current usage in excess of 20% of its current capacity. The use of local roads and lanes that have historic and natural features should be avoided.

Mineral Site Restoration and After-Use (Including Policy S12)

1. Do you agree or disagree with Policy S12?

Agree

2. Do you have any comments on Policy S12?

Policy good in principle but how will ECC ensure that quarried land will be restored to environmentally friendly bio diversity and not simply used for building and urbanization ?

The retention of existing natural features such as ancient hedgerows, trees should be a priority.

Proposals for site restoration after use must be agreed with the local community before sites are granted permission

Many of the proposed new sites are good quality agricultural land and it is highly unlikely they will be returned to this state. This has increasing importance due to the high profile the issue of food security currently attracts.

Section 4 – The Approach to Identifying Preferred Mineral Sites for Primary Mineral Extraction

1. Do you agree or disagree with this section?

Agree

2. Do you have any comments on this section?

No comment to make

Development Management Criteria (Including Policy DM1)

1. Do you agree or disagree with Policy DM1?

Agree

2. Do you have any comments on Policy DM1?

Agree, apart from the buffer zone which at 100m seems too small. Preferably should be 250m

Who decides what is “unacceptable impact” and what criteria are used in this assessment?

Primary and Secondary Processing Plants (Including Policy DM3)

1. Do you agree or disagree with Policy DM3?

Agree

2. Do you have any comments on Policy DM3?

Who decides what is “unacceptable impact” and what criteria are used in this assessment?

Section 6 – Implementation, Monitoring and Review

1. Do you agree or disagree with this section?

Agree

2. Do you have any comments on this section?

Accountability and transparency are vital to keep local communities on board. Authority Monitoring Reports should be widely publicised and made available to residents. The reviews need to be closely monitored by Parish Councils and therefore, must be published promptly.

Glossary

1. Do you agree or disagree with this section?

Agree

2. Do you have any comments on this section?

No comments to make

Appendix One, Two & Three

No comments to make

Plan Assessment and Wider Evidence Base

1. Do you have any comments on any of the full plan assessments or wider evidence base documents?

It would be interesting to know whether the RAG statements for each proposed site are weighted e.g does a red for biodiversity carry more weight than a red for PrOW?

The consultants RAG system is deeply flawed due to blatant omissions e.g. the Twin Oaks Gypsy and Traveller site is located within 50metres of A89 and is not mentioned

Some criteria are totally irrelevant and yet receive a Green light eg. Green belt and Airport safeguarding. An area where there is no green belt or near an airport receive Green lights; these two criteria should only counted if not green.