

## Response from Alresford Parish Council

### Lodge Farm A71 response

#### Document history

Version	Date	Comments
lodge farm response draft 1	07/03/2024	First draft for comment.
lodge farm response draft 2	11/03/2024	Language set to UK English rather than American English. Inclusion of CS review comments plus Yield section. Inclusion of SC comments on revised Essex Mineral Plan. Inclusion of AB comments on Methodology.
lodge farm response draft 3	13/03/2024	Inclusion of additional JCB text.
Lodge farm A71 response 3 final	23/03/2024	Inclusion of additional JCB text.

#### Circulation:

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## Response from Alresford Parish Council

### Replacement Essex Minerals Local Plan 2025-2040 (Regulation 18- Issues and Options) Dated February 2024

We have the following comments:

#### **Spatial Vision**

**Page 27 3.1 – Table 1 d) Protecting Amenities and Communities.** This cannot be achieved given the very close proximity of A67 Church Farm Field quarry to 219 residential properties, care homes, schools and children’s nurseries.

#### **Aims and Strategic Objectives**

**Page 29 - item 2 - To promote social inclusion, human health, and well-being.** Under item b) it states that impacts on amenity of those people living in proximity to minerals developments are rigorously controlled, minimised, and mitigated. Given the number of residential properties, nurseries and schools adjoining the site, the health and wellbeing provisions cannot be achieved.

**Page 31 – item 6 -To protect and enhance the natural, historic, and built environment in relation to mineral extraction and associated development.** Item c) To maintain and/or enhance landscape, biodiversity and residential amenity for people living in proximity to minerals development, cannot be met given the proximity of A67 Church Farm Field to residential properties, care homes, schools, and nurseries, as well as the existence of permanent and migrating wildlife within Church Farm field. The A71 Lodge Farm site’s close proximity to the River Colne/Alresford Creek and adjacent Lodge Farmhouse means that this site also fails to meet this objective.

**Page 31 – item 7 – To reduce the impact of minerals extraction and associated development on the transport system.** Sites A67 and A71 are not close to trunk roads, the nearest being 2 miles away, or urban growth areas and the local road network cannot transport aggregates safely or in an environmentally acceptable way from this site.

**Page 32/33 – The National Planning Policy Framework -** The key drivers of “Achieving sustainable development”, as set out within the National Planning Policy Framework, cannot be met given the close proximity of site A67 to the centre of the village. The proposals fail to deliver against the social dimension - promoting public health, wellbeing and safety, and the environmental dimension – protecting communities from adverse environmental impacts. **This means that Policy S1 within the NPPF – “Presumption in Favour of Sustainable Development” cannot be achieved.**

**Page 36 – Policy S2 Strategic Priorities for Minerals Development –** Clause 2 states that sustainable development must accord to the principle that 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. Given their proximity to housing, nurseries schools, care homes and the village centre, sites A67 and A71 do not meet these requirements.

#### **Page 82 - Policy S10 – Protecting and Enhancing the Environment and Local Amenity**

The policy states that applications for minerals development shall demonstrate that appropriate consideration has been given to public health and safety, amenity, quality of life of nearby communities and the natural, the built, and historic environment. Further, such applications shall demonstrate that no unacceptable adverse impacts would arise. However, given its proximity to the village centre, A67 Church Farm will have a significant, negative impact on public health and safety, amenity of residents and quality of life in the village. It will also damage the natural, built and historic environment, being so close to the heart of the village, and completely fails to meet the requirements of this policy.

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### Page 86 – Policy S11 – Access and Transportation

The requirements of this policy cannot be achieved because of the unacceptable impacts on the local road network affecting safety and capacity, local amenity, and the environment. On leaving the site, the local “C” classification road network is unsuitable for use by HGV’s and there’s no direct access to the main B and A road network. The MPA seeks to minimise road mileage and direct lorries onto suitable routes with mineral traffic expected to use trunk roads and main distributors. This is not achievable from either the A71 or A67 sites. Further, there are no appropriate suitable secondary distributors and, as a result, aggregate lorries will have to use narrow roads which are unsuitable and pose a significant threat to the health and safety of pedestrians, cyclists, and motor vehicles. There will also be constant impact damage to this local road network.

In addition, the MPA seeks to minimise road mileage and direct lorries onto suitable routes with mineral traffic expected to use trunk roads and main distributors. This is not achievable from either the A71 or A67 site.

### Page 110 – Policy DM1 – Development Management Criteria

This policy states that proposals for minerals development will be permitted subject to it being demonstrated **that the development would not have an unacceptable adverse impact, including cumulative impact with other developments**, upon:

- Local amenity (including demonstrating that the impacts of noise levels, air quality and dust emissions, light pollution and vibration are acceptable)
- Health and wellbeing of local residents, as well as the wider community, who could be impacted by the by operation of the development.
- The safety and capacity of the transport network.
- The appearance, quality and character of the landscape, countryside and visual environment and any local features that contribute to its local distinctiveness.
- The natural and geological environment, including bio-diversity and ecological conditions for habitats and species.

### Current minerals development

A new Minerals extraction site 500m north of the village has recently been approved by the planning authority. Sunnymead Farm, reference 18/01107/CMTR, will be worked to extract 4 million tonnes of sand and gravel. Any further extraction sites included under this proposed Plan would have a devastating and unacceptable impact on the village, its residents and visitors.

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Alresford Parish Council- proposed re-evaluation of RAG assessment/Consultation document Lodge Farm, Candidate site reference A71

RAG assessments ECC

A71 Lodge Farm

Current RAG ratings

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	Red/Amber	Amber/Green	Amber	Green	Red	Red/Amber	Red/Amber	Green	Amber	Green	Amber	Amber/Green	Red/Amber	Green	Green

Proposed RAG rating

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 and Utilities	Health and Amenity	Green Belt	Airport Safeguarding Zones
Red	Red	Amber/Green	Amber/Red	Amber/Green	Red	Red	Red	Amber/Red	Red	Red	Amber	Amber/Green	Red	Green	Green

NB comments from consultation documents in quotation marks.

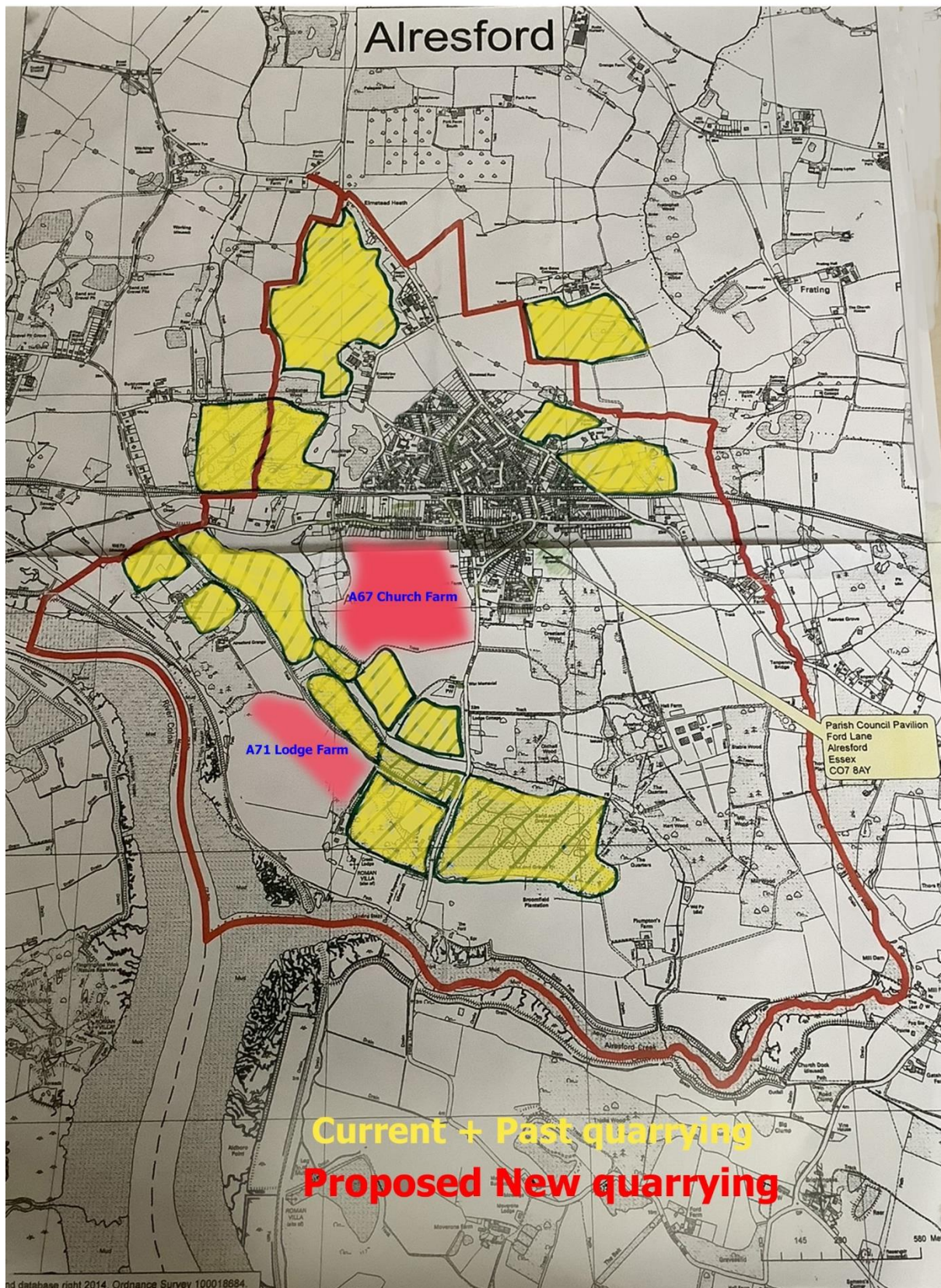
In addition to the ECC comments we highlight the following:

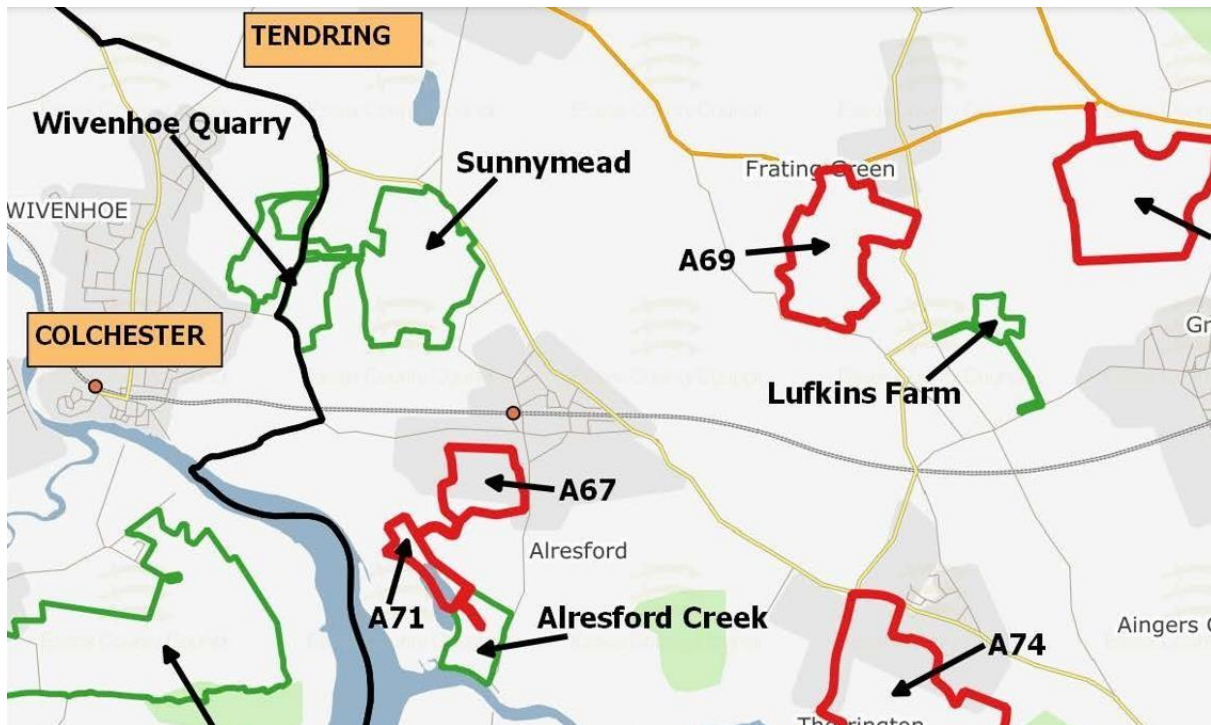
Alresford Parish Council understands that previous attempts in 1992 and 2011 to allocate this site for quarrying were rejected by Essex County Council due to the proximity of the site to residential

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properties. A minimum distance of 250 metres was firmly recommended by the Minerals and Waste Panel as a clear buffer zone between the quarrying area and residential properties. Application of this buffer zone made the site non-viable for quarrying. Alresford Parish Council expects the 250 metre limit to be applied again.

The following map illustrates how Alresford has been affected by previous quarrying in the area and how close proposed quarrying will be to the centre of the village.





Areas outlined in green show the sites of currently operating quarries.

Areas outlined in red show the sites of proposed quarries.

The area in grey depicts the village of Alresford and includes currently approved planning developments.

This demonstrates the sheer scale of the proposed developments, how close they are to residential properties, how they will dwarf the village and how difficult it would be for HGV traffic to connect with the B1027.

#### SITE SPECIFIC RESPONSES

NB please note all material in quotation marks is taken from the ECCS own consultation/assessment documents.

1. Landscape and Visual Sensitivity, ECC proposal Red/Amber. APC assessment RED.

LCA-site aligned with both Tendring Plain and Dengie and Foulness Coast, characteristic features of both LCAs but more aligned with latter “in terms of remote and tranquil character....including arable farmland with widely dispersed woodland with open views... consideration is required to protect these characteristic features” mitigation not possible as some of the 3 fields comprising this site are too small to be excavated separately, therefore the ancient and Priority Habitat hedgerows including veteran and ancient trees separating them would have to be destroyed for this site to be utilised. Government regulations do not allow the destruction of ancient trees, they are “irreplaceable habitats”.

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Two PROW travel along and through the Site allowing views west across toward the River Colne, “magical views” said Sir Bernard Jenkins MP on his recent visit “the views allowed are considered sensitive and proposed mineral extraction would be located between PROW and the river. We would expect these views to be screened and the perceptual quality of these receptors to be adversely impacted with limited mitigation options.

These vistas are a precious amenity enjoyed daily by large numbers of people both from our community and from miles around. For many people, especially those who are weary, dealing with difficulty or ill health, to be able to step out of the stress and hubbub of daily life for a few moments, to walk here, breathe in the clean sea air and enjoy the change of perspective. The inner peace that these magnificently spacious vistas can restore is of huge benefit to physical and mental wellbeing and must be fully protected.

### 2. Biodiversity,

ECC proposal Red /Amber. Upgrade to Red.

ECC comments in consultation document quoted below, fully justify this change.

“Site A71 is in a highly sensitive location. It is 130m from the Colne Estuary Special Scientific Interest (SSSI) Special Protection Area (SPA) internationally renowned Ramsar site, Essex Estuaries Special Area of Conservation (SAC) and the Blackwater, Crouch. Roach and Colne Estuaries Marine Conservation Zone. These areas contain Coastal Saltmarsh and Mudflats Priority habitats”.

“The Colne Estuary is one of the most important areas for overwintering water birds in the UK and of international importance for several breeding bird species.”

“There is a high potential for adverse effects to the integrity of the SPA SAC and Ramsar site which need to be considered further through the plan-level Habitats Assessment and any subsequent planning application.....ecological impacts are likely to be major....includes impacts to water quality affecting Priority Habitats of River Colne and tributary water sources...disturbance to and loss of land for breeding and wintering birds for which the SSSIs, SPA and Ramsar site are designated. In addition, the site could have major impacts upon irreplaceable habitats (veteran and ancient trees, losses not permitted within Government Biodiversity Net Gain BNG Metric), ancient hedgerows, Acid Grassland Lowland Mixed Deciduous Woodlands which are Priority Habitats which could be affected directly and indirectly....”.

The list of extremely important bird and wildlife species which would be negatively affected by this proposed site is too extensive to be entered here. There is a comprehensive list in Appendix (i)

So many of the people that we hear from are astonished that a quarry, Lodge Farm A71, has been proposed in an area containing such precious biodiversity resources. How could such rich habitats, which are already covered by many stringent protections, ever be considered acceptable as quarry sites?

The fields that will be quarried if the proposal goes ahead currently include ancient and veteran trees and hedgerows, Priority habitats, breeding areas for native birds such as Nightingales (several breeding pairs) Corn Bunting (a rare breeding bird in UK), 2/3 pairs Yellowhammer (breeding, on the endangered bird “red list”) Redpoll, Bullfinch, Linnet, Siskin and Brambling and Redwing are all seen here. A pair of Hobbys are breeding here, very rare occurrence, they feed on dragonflies in these



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grassy fields. Other birds of prey that are seen here are Marsh Harrier and the v rare Hen Harrier, Merlin, Peregrine, Short-eared Owl, Long-eared Owl, Little Owls have bred in the Mature Hedgerow here. These fields support a rich variety of all types of wildlife, multitudes of butterflies abound, some very rare, Purple Emperor and White-letter Hairstreak are seen here. Beautiful ancient trees and hedgerows, irreplaceable habitats, are in danger.

The rough grass in the lower fields is also feeding grounds for wading birds, Lapwing, Golden Plover, Ruff, and Curlew are seen.

The fishing lakes which also will be subject to HGV and quarrying disruption currently host Kingfisher, Great Crested Grebe, Gadwell and breeding Pochard (only 700 breeding pairs in the UK)  
This wonderful diversity must be protected.

3. Historic Buildings,  
ECC proposal Amber/Green, APC in agreement

4. Archaeology,  
ECC proposal Amber upgrade to Amber/Red.

“Site lies within area of archaeological features through photographic Ariel photography...high potential to contain Palaeolithic archaeological remains”.

A great deal of evidence has been amassed by local historians regarding the archaeological richness of this site, verified by results of finds from excavations covering wide range of eras including Neolithic and Palaeolithic remains, Roman finds, Iron Age Burial urn etc “Granny’s bench” area of the PROW descending to Colne and much more.

Quarrying in the twentieth century has already destroyed:

- the iron age barrow in 1942 *on top of the hill overlooking Alresford Creek and the Colne Estuary, about 70 yards north-west of Bench Mark 74.8 and 560 yards slightly west of south from Alresford Church* (Hull 1946, Lever 1922). This is to the south-east of the current Haul Road nearly at the entrance to site A71.
- the two unique ring ditches around Saxon Graves in 1984 (TM 071199 - Bedwin 1984)
- and the Romano-British enclosure near to Broomfield Plantation. (Priddy 1984/5)

5. Flooding. EEC proposal Green, update to Amber/Green.

The site appears to have been partially excavated in the past near the PROW. Surface water is habitually seen lying in the lowest points of this area which could indicate **the** upper level of the water table. This will inevitably be changed if the 2 quarries proposed in Alresford go ahead. With the proximity of Sixpenny Brook and large lakes nearby flooding is a possibility. Given that the site is very close to the coast and the surface of the field is already very low, a deep quarry excavation could take the site close to or below sea level. In the event of flooding pumping would be needed for quarrying to be possible, the noise and possible pollution into the Colne would have a serious impact on the rich marine life, both vertebrate, invertebrate and the bird life protected by the Ramsar and SSSI, SPA site designations as well as the many species of wildlife currently inhabiting this site.

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### 6. Transport. ECC proposal Red, APC proposal RED

Local roads cannot support increased volume of HGV traffic. It is anticipated that the proposed sites would require an extra 140,000 HGV journeys just to remove extracted sand and gravel.

According to Appendix G, an empty lorry weighs 13 tons and a full lorry c30 tons. The current Weight limit of 7.5 tons set by the Structures Team on B1027 at Alresford Viaduct means traffic trying to access A133 and A12 must head towards Colchester to access A133 at University of Essex/ Elmstead Market or else travel through Alresford village to access A133 from B1029.

According to Appendix G, the alternative route from Marsh Farm Corner will soon face a 7.5-ton limit on the Alresford Road railway bridge.

*“From a highway viewpoint there are concerns regarding the ability for HGVs to connect satisfactorily with the Main Road Network in particular for Alresford village and Thorrington additional movements this proposal would generate and the implementation of a 7.5-ton weight restriction on Alresford viaduct for the B1027 north-west of Wivenhoe Road and the implementation of a diversion route to avoid the weak structure. The proposed implementation of a similar weight restriction on Alresford Road for the Network Rail bridge, this financial year. In addition to the above, the Structures team advised that this financial year they will also be commissioning the design and installation of a diversion route signs to avoid the weak viaduct (circled in red above) on Alresford Road for the Network Rail bridge.”*

This is also a narrow road of 6.8m wide where two buses or lorries cannot pass simultaneously. The diversion route in Appendix G, shows the only possible route for a 30-ton lorry is through the village, even when the Alresford Viaduct is repaired.

### 7.ACCESS- Red/Amber upgrade to RED.

Use of existing haul road Alresford Quarry to Wivenhoe Road is neither safe nor sustainable for these sites. The 4m wide concrete track is sandwiched, only 1-2 metres distance in many places, between the PROW bridlepath on one side and sheer drops from previous quarrying on the other. This haul road was laid 30yrs ago with no foundations, merely spare concrete from the quarry cement business laid directly on a gravel track by their workers, intended as a temporary (10 year) solution. The cement is crumbling, wide fissures in many places, HGVs often crash at speed over this broken surface creating unacceptable noise, dust, diesel, and particulate levels, both for residents and for the many walkers, dog walkers, cyclists, joggers et al who come to enjoy the health-giving amenity of the tree-lined PROW bridlepath. It is only safe for horse riders to use the path on Saturday afternoons or Sundays when lorries are not running. There are few safety barriers on the haul road to protect drivers from the sheer drops along much of its 1.7-mile length and none up to HSE standards for the size, weight and speed of HGVs now using it. There are no safety or noise barriers to protect users of the bridle path. Passing places are completely inadequate, users of the bridlepath PROW and residents of the Marsh Farm Community (10 residences, within 15-100 metre of the haul road) often hear the squeal of brakes then reversing alarms and can see trucks reversing to the nearest passing place to allow another to pass. Video evidence available.

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Creation of safe degree of splay for large numbers HGV exit and entry at junction of haul road/Wivenhoe Road is not possible due to steep drop from existing quarry excavation within 3-4 metres.

ECC own guidelines that HGVs must be able to exit and enter haul road simultaneously cannot be complied with, a highly dangerous build-up of stationary vehicles on the haul road and highway would be inevitable.

Serious incidents have already occurred on this haul road, at least one resulting in a HSE investigation. The proposed quarrying at A67 and A71 sites would result in a massive increase in current HGV numbers, 140,000 40 tonne HGVs movements would be necessary to move the proposed 2.8million tonnes of mineral during the active life of these new sites. Such pressure on an unsafe and completely unsuitable access road could easily result in a fatal incident.

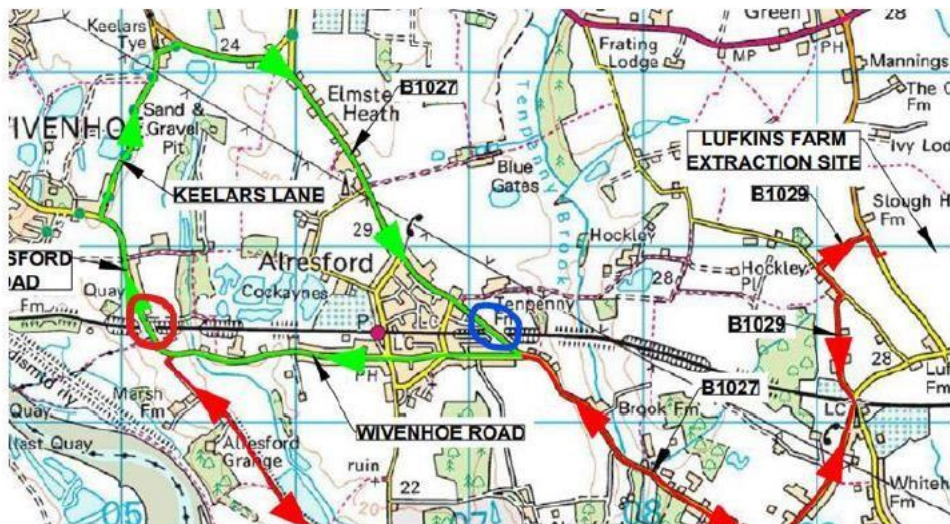
Safety is also a major concern at the junction of the haul road and Marsh Farm Lane/Wivenhoe Road. There have been many “near miss” incidents when speeding HGVs fail to respect the stop signs as they exit the haul road or cut the corner when turning in sharply from Wivenhoe Road.

It is essential that a thorough HSE survey of this haul road, from the Wivenhoe Road entry point onwards to the proposed sites is made regarding these multiple safety and logistic concerns before ECC’s consultation process proceeds further.



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Alresford Road railway bridge, 7.5-ton weight limit to be put in place “in this financial year”. The bridge is not wide enough to allow 2 buses or HGVs to pass, there is no pavement for pedestrians to use, highly dangerous. In the distance can be seen the sharp bend of Marsh Farm Corner where haul road from proposed sites A67 and A71 will join Wivenhoe Road.



### 8. Public Rights of Way (PROW). EEC proposal Amber/Red APC proposal RED

Several important PROWs will be lost or seriously damaged by quarrying at site A71. As we step through the gate from the upper PROW (Bridlepath 13, which is only a few metres from the haul road, due to be carrying many 1000s of HGVs in active phase of site A71 and A67-see below) onto the lower PROW to proposed site A71 where we can currently still enjoy superb vistas over the Colne Estuary as it widens to meet the sea.

These views are a precious amenity enjoyed daily by many people, both from our community and from miles around. For many people, especially when dealing with difficulty, to be able to step out of the stress and hubbub of daily life for a few moments, to walk here, breathe in the clean sea air and enjoy the change of perspective, an inner peace that these magnificently spacious vistas connecting us to 1000s of years of local history can restore. The Romans passed up this river to found Britain's first city nearby. It is an immensely valued resource which must be protected, an amenity of great benefit to our community's physical and mental wellbeing.

Transversing the field on the lower PROW, descending past the affectionately named “Granny's bench” (sadly also facing destruction if this site is quarried) where so many have paused to rest and reflect, to enjoy peace, birdsong, and the aforesaid beautiful views. Close-by, also on the PROW is the ancient yet still living hollow oak in which generations of local children have played. We can then walk down the iconic “Jacob's Ladder” into marshy area bordering the banks of the River Colne, trees rustle in the wind and on summer evenings we can listen to the Nightingales sing. We walk by ancient hedgerows, enjoying beautiful veteran and ancient trees, priority habitat for many birds and much wildlife, all which are now under threat. This wonderful amenity, a very important resource for both our local and wider community, would all sustain very significant and long-term damage from the proposed quarry here, no mitigation, no meaningful rerouting or restoration of these PROWs is likely.

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As mentioned above the damage that the excavation of proposed quarries A67 and A71 in Alresford would cause to both users and wildlife habitats of the upper PROW, Bridleway 13, will be extreme. The haul road, which runs within a few metres of the Bridleway along its 1.7km length is earmarked to carry all 2.8 million tonnes of excavated and then processed mineral out to the wider road network, 140,000 extra lorries would crash along its length over the period of excavation. The constant noise, dust and particulate pollution caused would make it impossible for the local community to continue to use this PROW. The loss of the amenity of rest and restoration of wellbeing, particularly regarding reduction of stress and its effect on mental health, would be tragic.

### 9. Geo-Environmental – ECC Green upgrade to Amber.

The time taken to restore a healthy permaculture e.g. renewing previous natural levels of worms and other soil micro-organisms means that it will take over 30 years to restore arable land to previous fertility levels.

Higher quality agricultural land will require even more remedial work and longer restoration timescale to return it to its previous productivity.

The use of inert waste re-cycling for landfill can lead to further geological problems.

### 10. Hydrology and drainage – ECC proposal Amber upgrade to Amber/Red.

Significant effects in this regard mainly in common with A67, Damage to existing mature/veteran and ancient trees + hedgerows by drop in water levels, loss of facility for several properties nearby, including Alresford Grange, who have no mains water supply or sewerage. There are significant possibilities of damaging pollution being carried into River Colne and Estuary because of pumping or underground rerouting of springs etc due to effects of quarrying. The River Colne and its Estuary are internationally renowned as a protected Ramsar site, SSSI and SAR are in place also to protect the large numbers of migratory and breeding wading/water birds. Given the much larger size of present-day quarries and therefore a much larger amount of water used in mineral processing if potential pollutants were to be discharged to sea or neighbouring large water bodies it could have serious repercussions on marine and birdlife. In such an incident recently, an accidental discharge from Alresford Quarry that polluted a private lake nearby resulting in death of fish.

### 11. Air Quality.

ECC proposals Green, APC proposals change to RED for both sites.

A67-Sand/dust pollution for the whole area will be extreme given prevailing strong SW wind directions but especially damaging will be the impact on the schools, very few classrooms with air conditioning means that windows would need to be opened in the summer exposing children and staff to hazardous levels of dust and invisible fine talc. No mitigation possible for outside recreation area playgrounds within 26m from site. Same for care homes and residences. Inability to enjoy gardens.

Quarrying on A67 and A71 sites will also generate increased diesel fumes/particulates from quarrying machinery on site + 1000's of extra HGVs on the roads in the near vicinity. Current and proposed bridge closures could mean all HGVs would have to travel through Alresford village on narrow "C" roads, and potentially waiting at railway crossings, queues of idling HGVs would generate greatly

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increased air pollution, cumulative effect with existing traffic, especially as the approved Sunneymead site will be starting production soon, would be unacceptable with no mitigation possible.

As noted before in "Access" and "Public Rights of Way" sections unacceptable levels of air pollution would be generated by the 140,000 40 ton HGV movements needed to move 2,8 million tons of mineral excavated for processing and processed mineral along the haul road. This would be seriously detrimental to the users of the PROW bridleway that runs parallel to the haul road a few metres away. No mitigation is possible. As previously noted this 4 metre track is too narrow for even one way traffic with few passing places, vehicles often need to reverse on the track to reach passing places even with current relatively low vehicle levels. The current haul road cannot be widened due to steep drops on one side and with ancient PROW bridlepath on private land on the other.

### 12. Soil Quality

ECC proposal Amber APC no change

### 13. Services and Utilities

ECC proposal Amber/Green APC no change

### 14. Health and Amenity ECC Red /Amber upgrade to RED

The significantly negative effects from the loss of Amenity for Health and Wellbeing, both physical and mental, that would result if these proposed quarry sites A67 Church Farm and Lodge Farm A71 space are approved, are central issues throughout these response documents.

To recap briefly, some of the most important challenges to Health and Amenity include: Air Quality, Noise, Loss of peaceful natural environments which support/ restore physical and mental well-being.

Airborne sand will be generated during quarrying, dust and diesel fumes and extreme noise levels from very high number of HGV movement that will be required.

It would be impossible to mitigate very high levels of sand dust/ dust from the quarrying process being blown over into schools, care homes, recreation areas by the strong prevailing South Westerly winds. This would also negatively affect the amenity offered by Bridleway13 to walkers, dog walkers, horse riders, cyclists, joggers, families etc. who currently use the lane as a health-giving resource, giving them a chance to relax and restore wellbeing in Nature.

Damaging levels of noise and diesel fumes etc will be generated by 1000s of extra HGVs on top of current traffic levels (estimated at 20-28,000 per year over 5 span active life of quarries then more in the restoration phase). The HGVs will be transporting excavated material, within a few metres of this bridleway along its 1.7k length, over the broken concrete haul road that runs alongside. These HGVs will then be coming through Alresford village when the planned 7.5 weight restriction is imposed on the small railway bridge on Wivenhoe Road close to Marsh Farm Corner. Peaceful enjoyment of their homes and gardens by residents would exacerbate this loss of amenity.

Loss of the amenity of enjoying our most important peaceful natural environments such as the PROW bridleway and the 2 footpaths that cross the fields proposed as A71 site would have very significant negative impact on the lives of all who value these beautiful open spaces, loss of expansive views, priority habitats rich with birds and wildlife leading down via "Jacob's Ladder" which currently

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connects with the highly valued Wivenhoe Trail along the riverbank, access to all these wonderful amenities which support and restore our physical and mental health will be lost. Mitigation unlikely to be possible as rerouting the footpath would present many challenges.

Fishing is a very popular leisure activity in the community here. Access to existing fishing lakes and the car parks serving them will be closed for the duration of the quarrying. The loss of this amenity with its health-giving benefits, an opportunity to relax and recuperate in peaceful countryside would be greatly missed.

The leisure amenity offered by the BT and Postal fishing lake would be lost for the duration of the dig and its restoration due to the closure of its access track and health and safety considerations required on an active quarrying site.

Similarly, the quarry access road over Six Penny Brook to the quarry haul road would also close the northern access and car parking to the Alresford Angling Associations fishing lake.

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### Methodology Comments Section

The methodology is inconsistent between the different assessment areas within the documents which have been RAG rated.

There has been no consideration of the previous consultation response and both the scoring, and the approach have been changed for no obvious reasons.

Too much information is hidden away in appendices and not shown within the site-specific documents.

The appendices are excessively long:

Appendix b 226 pages

Appendix c 214 pages

Appendix d 128 pages

Appendix e 103 pages

Appendix f 107 pages

Appendix g 84 pages

Appendix h 65 pages

Appendix I 74 pages

A total of 1,001 pages which assuming a reading speed of 60 pages an hour would take just under 17 to read once, let alone understand.

The appendices themselves contain many links to externally published documents which make it extremely difficult to get an objective understanding of what the documents are referring to. By way of example Appendix E Archaeology details refers to 6 separate documents on page 2 alone.

The document "Assessment of Candidate Sand and Gravel Sites" includes the following text and begs the question why refer to 52 separate sites when 36 are already red rated.



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Criteria-led site assessment methodologies have been applied that reflect the planning priorities in Essex. Assessment methodologies were devised for each of 16 assessment criteria. Each site was graded against each criterion by applying quantitative and qualitative measures, for its suitability against a Red-Amber-Green (RAG) scale.

The main report includes the RAG grade and key assessment findings for each Site. Detailed assessments are included in the appendices.

36 sites were found to have at least one Red grade which broadly means that, at least for criteria against which the Red grade was applied, the likely impact of the Site is serious and without focussed consideration, mitigation of that impact would be difficult to achieve.

Decisions on whether to allocate sites with Red grades will be taken in the future following further public consultation on this report, including with the Site promoters and other stakeholders including statutory environmental bodies and local communities. Further, additional

The absence of site visits before this first stage of consultation has resulted in demonstrably unsuitable sites have been included in the process when a simple site visit would have excluded the site e.g. A67 very close proximity to schools, care homes, much residential housing; A71 exceptional PROWs giving significant physical and mental health amenity. A67/A71 haul road access too narrow, unsafe, no mitigation possible. Cost to ECC and stress on communities would have been greatly reduced.

The methodology does not take account of previous quarrying and the cumulative impact of assessment criteria from neighbouring sites; this is especially important for the Tendring area when considering traffic for example. Each site is proposed for development within the 15-year period of the plan. Each site will probably be in production for 3 to 5 years but the absence of any phasing of planned developments means that it is not possible to support an individual site without this context. By way of example Sunnymead was approved for development in 2014 but has only started actual development in February 2024.

Whilst the red boundary site maps used in the site-specific reports are obviously topologically equivalent their use for comparative purposes is effectively meaningless. The red boundary of the site is designed to fit a portrait page within the document. To achieve this each site map has been produced to a separate scale meaning that key contextual points e.g. proximity to residential buildings, access to primary roads are excluded. This also means that the A71 Lodge Farm site map actually looks bigger than site map for A67 Church Farm.

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The maps do not show approved planning developments which obviously excludes significantly increased residential properties that will be affected by any changes because of quarrying.

There is also a strong sense that not enough time has been given for responses to such important matters, that so few residents were alerted and that the process of lodging an objection is unhelpfully complex.

### **Yield Section**

A71 Lodge Farm is a relatively small site, it has 0.8 million tonnes yield estimated.

A site visit would make the likelihood of a reduced yield apparent. In the central field including the PROW down to the banks of the Colne Estuary, both topography and soil quality indicate at least a partial previous excavation. The western end of the site falls towards the River Colne more steeply than that at the eastern end, suggesting some 50% of this site has been excavated previously, and as such it is difficult to see how this site could meet the expected 0.8m tonnes yield. This field is separated from the most northerly area earmarked for excavation by a rich area of veteran and ancient trees and hedgerows alongside the PROW. Government regulations preclude the destruction of these "irreplaceable habitats" so access to the northern field would not be possible. Considering the contracted size of the site and the mitigation requirements to make this site acceptable, in economic terms this site does not appear to be commercially viable.

### **Next Steps**

It is vital that ECC Minerals and Waste Planning Department update their current site maps to delineate the correct route of Alresford Quarry's haul road as part of the quarry site. This haul road, built for the sole purpose of providing a route for HGVs transporting materials in and out of Alresford Quarry, was granted planning permission to exit onto Wivenhoe Road, Alresford in 1988- documentary evidence is available.

Since that time the previous haul road, exiting onto Ford Lane has been withdrawn from service; but through an oversight is still shown as the current haul road on ECC maps. It is necessary that this clarification is made as soon as possible to ensure there is no further confusion - there are places in this current 2025-2040 Consultation regarding ECC Minerals Local Plan Review where the Ford Lane exit is referred to as if it were currently in use.

Additionally, Marsh Farm Lane residents, 10 houses between 15-150m distance from the actual haul road and residents on the other side of Wivenhoe Rd, would have their right to be notified of quarry development and other protections acknowledged.

ECC records/maps show Alresford Quarry as an active quarry, but this has not been the case for at least 25years. A concrete business remains, and briefly a processing plant have been operating there since that time. ECC records should be amended to show this and the inaccurate description in the 2025-2040 Consultation of sites A67 Church Farm and A71 Lodge as being "extensions of an active quarry" should be removed.

We are happy to undertake a site-based consultation with ECC mineral planning officers so that we can show them the location of previous and proposed quarries. This will provide context to the impact of multiple sites in Alresford and it would enable us to make representations in the same way as a District Council Local Plan exercise.

## **Response from Alresford Parish Council**

We need to understand the basis and composition of the “RAG” scoring, together with the assumptions and interpretation of the facts. It would be helpful for ECC to explain how the application of policy in the Minerals Plan has been translated into the site scoring mechanism and how the latter has been derived.

At a previous “call for sites” the ECC planning team attended a meeting with representatives from Alresford Parish Council. This was productive and went down very well with the community, as well as the Council. A repeat exercise would be a good idea and would be well received.

We would request that all of these suggestions be enacted before any further decisions are made that could lead to the two proposed Alresford “sites” being placed on the preferred sites list.

