

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, 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.

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 also 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 also 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 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 biodiversity 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 tons 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.

Site Specific Comments

A67 Church Farm

Headings show from ECC document current and proposed re-evaluation of RAG ratings. Current

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

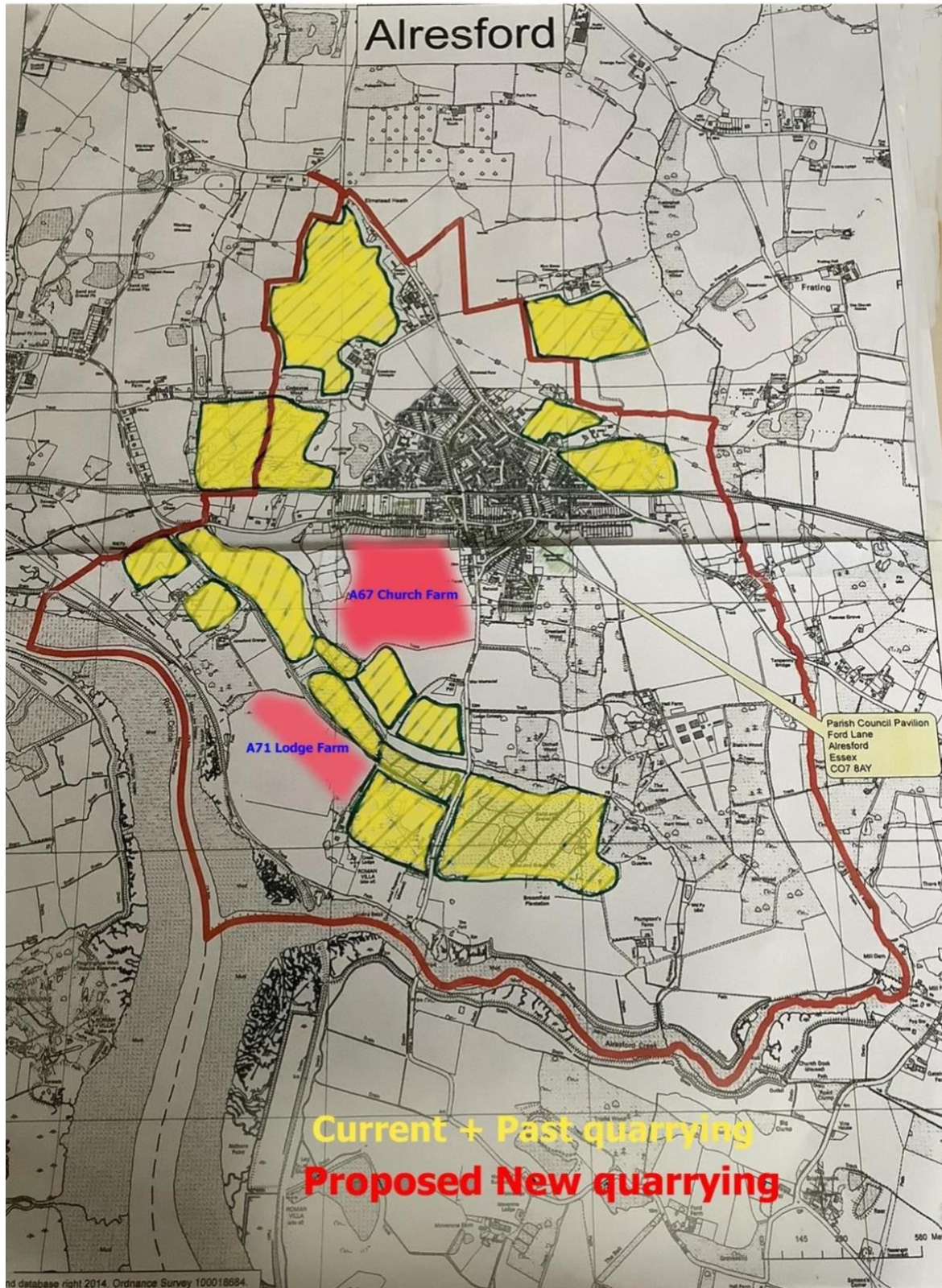
Proposed RAG ratings

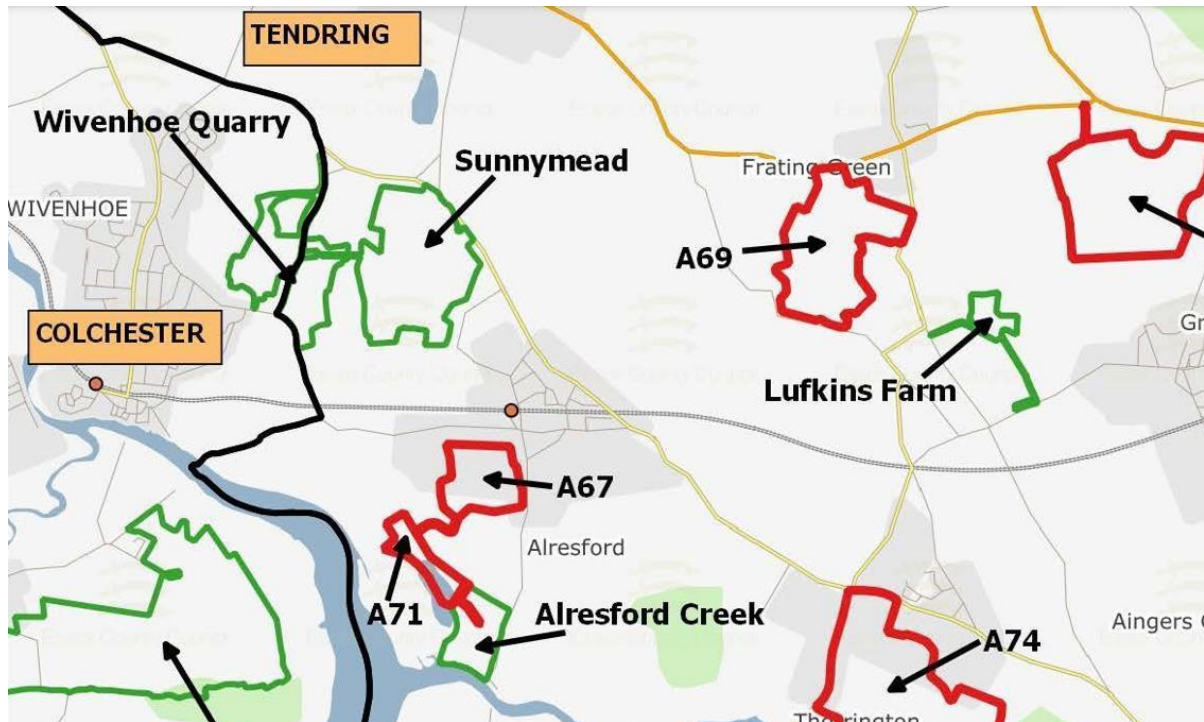
Landscape and Visual Sensitivity	Biodiversity	Historic Buildings	Archaeology	Flooding	Transport	Access	Public Rights of Way	Geo-Environmental	Hydrology, Hydrogeology and Drainage	Air Quality	Soil Quality	Services & Utilities	Health & Amenity	Green Belt	Airport Safeguarding Zones
Red/Amber	Red	Red/Amber	Red/Amber	Amber	Red	Red	Red	Amber	Amber	Red	Amber	Amber/Green	Red/Amber	Green	Green

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 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.

1. Landscape and visual sensitivity – Amber/Green upgrade to Red/Amber

Destruction of far-reaching views from the village over Sixpenny Brook, trees and fishing lakes.

Views across to St Peter's church where many villagers have families interned or commemorated. The graveyard at the church is still active and it is a place for quiet contemplation for many villagers. It is also very important that a visual connection to and

from the church is maintained and that any quarrying activity does not destroy that connection.

Storage of excavated topsoil on site whilst sand and gravel are extracted is no mitigation.

The duration period of excavation is unknown and the likely working period is unknown but will greatly affect other areas especially transport.

2. Biodiversity – Red/Amber upgrade to Red

Noise seriously disturbs wildlife.

The internationally renowned Colne Valley Ramsar site starts immediately south of the proposed site and includes.

Colne Estuary SSSI, SPA, SAC, Blackwater Crouch, Roach and Colne Estuaries Marine Conservation Zone and Ramsar site. There are various SSSI covering a wide range of species on and around the site.

Recently developed wetlands at Fingringhoe on the opposite riverbank which are also part of the Ramsar site attract increasing numbers of wildlife which use Church Farm field. They include:

Common Pochard, Ringed Plover, Brent Geese, Common Redshank, Golden Plover, Little Tern, Skylarks and Hen Harrier.

In addition, the area supports Otters, Bats, Hazel Dormice, Greylag Geese, Canada Geese, Water Vole and Great Crested newts.

3. Historic Buildings – Red/Amber

There are 12 listed structures in Alresford parish which constitute designated heritage assets. Of these, 11 are Grade II listed and there is one scheduled monument (the remains of St Peter's Church). All these listed assets are protected by national and local plan policy.

There is also the opportunity to identify other local structures which are of heritage value. These 'non-designated heritage assets' do not hold the same value in heritage terms as listed buildings and scheduled monuments, but they are assets (buildings, monuments, sites, places, areas or landscapes) identified as having significance which must be taken into account when considering planning applications which either directly affect the asset or its setting.

Several non-designated heritage assets have been identified in Alresford and were included in the Alresford Neighbourhood Plan.

4. Archaeology – Amber upgrade to Red/Amber

Known archaeological sites.

Archaeological field walking and excavation report at Church Farm dated October/November 2001 undertaken by the Colchester Archaeological Trust relates "excavated evidence indicates a medieval settlement to the west and northwest of St Peter's Church, a scheduled monument, being within the

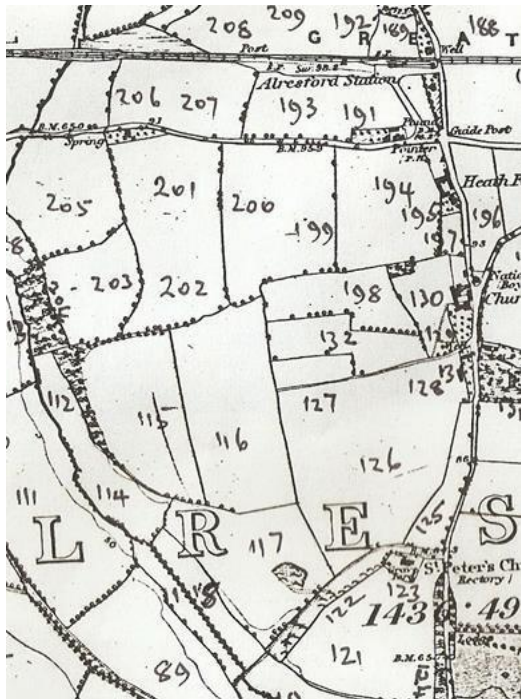
area of proposed mineral extraction". Field walking at the site found forty-eight shards of fabric 20 medieval pottery, an oyster filled ditch, Roman tegula and 30 pieces of neolithic flint. The latter were donated at the British Lithics Society Conference to the current Benefice Historian and are regularly displayed.

In 2000, 100m east of the field one hundred bronze coins from the House of Constantine (fourth century) were found and sent as a Roman hoard to the British Museum. (**Bland R (2018) 43-498AD Coin Hoards and Hoarding in England p276 record 2527**)

Consultation with Deborah Priddy of English Heritage has confirmed their view that ECC should give considerable weight to the impact of further extraction on St Peters Church. They believe the site workings would leave the church isolated and damage the relationship between the original settlement and the village. The workings will, in their opinion, adversely affect the church and the landscape.

On the advice of Dr Adam Wightman of Colchester Archaeological Trust, the aerial photographs from the dry summer of 2018 on *Google Earth Pro* were consulted. These clearly show earth works as green non-regular lines on the slopes down to the Sixpenny Brook – probably Iron Age to Saxon enclosures.





The area of these earthworks was identified on the 1843 Tithe Commutation Map as fields 115 and 116. With a boundary of 100m/250m from listed buildings and schools etc., this corner of the site would be all that's left to quarry.

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 Benchmark 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)
- Further destruction of archaeological evidence and remains should not be allowed.

5. Flooding – Amber

There are known issues on Ford Lane due to inadequate drainage which require regular intervention from Essex Highways. It is not clear how these will be affected by the positioning of bunds around the edge of the site.

The flooding issue results in many on foot visits to St Peter's Church and graveyard having to be aborted due to the flooding making the lane impassable to anyone not wearing wellington boots.

6. Transport – Red

Local roads cannot support increased volume of HGV traffic. It is anticipated that the proposed site would require an extra 100,000 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 has to 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.

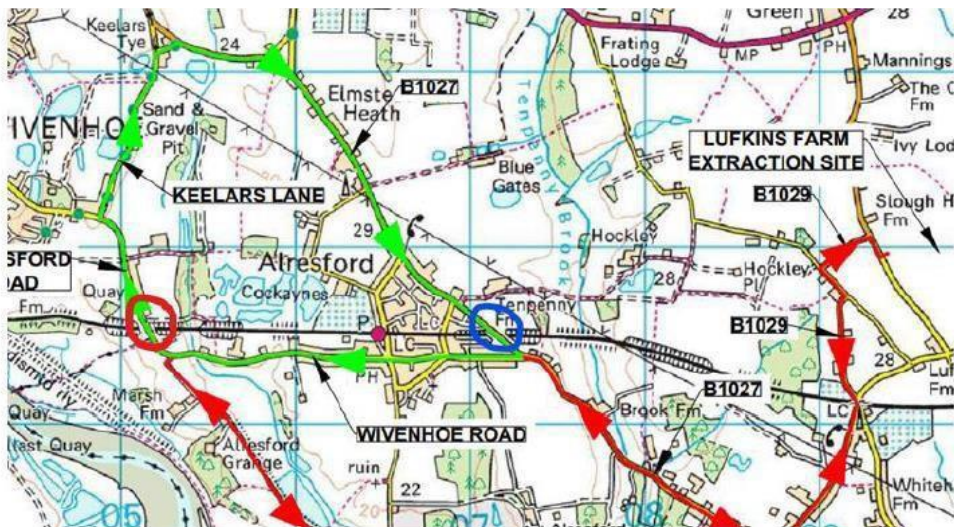
“From a highway viewpoint there are concerns regarding the ability for HGVs to connect satisfactorily with the Main Road Network in particular for Alresford village and Thorrington additional movements this proposal would generate and the implementation of a 7.5 tonne weight restriction on Alresford 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.



Alresford Road railway bridge. In the distance can be seen Marsh Farm Corner on Wivenhoe Road. February 19th, 2024.



From Appendix G, RED is the Alresford Railway Bridge (soon to have a weight limit of 7.5 tons) and in BLUE the Alresford Viaduct which has an emergency weight limit of 7.5 tons. The only routes left run along Station Road and Coach Road, through the centre of the village, which are currently used by over twenty lorries a day.

The pending opening of Sunnymead quarry will further exacerbate local traffic issues. It is planned that 4.6mt of sand and gravel will be extracted over the course of the next 16 years equating to 230,000 extra HGV journeys over the period.

7. Access – Red/Amber upgrade to Red

Appendix H relates to

- *The private road forms part of Bridleway 13 (Alresford_157) of the PROW network.*
- *The private road joins an established junction with Wivenhoe Road that serves Alresford Quarry, the key findings for this access/junction are:*
 - *Wivenhoe Road is subject to a de-restricted speed limit and is **approximately 6.8 metres wide with no existing designated right turn facility** serving the Site **or street lighting** in the vicinity of the access.*
 - *Wivenhoe Road is classed as a PR2 road (Secondary Distributer) under the County's Route Hierarchy.*
 - *Standard T- junction with radius kerbs, width 9 metres plus for the first 20 metres narrows to 6.8 metres and again to 3.8 metres at gated entrance and the start of the Bridleway.*
 - *No segregated footway in the vicinity of the Site.*

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 also 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

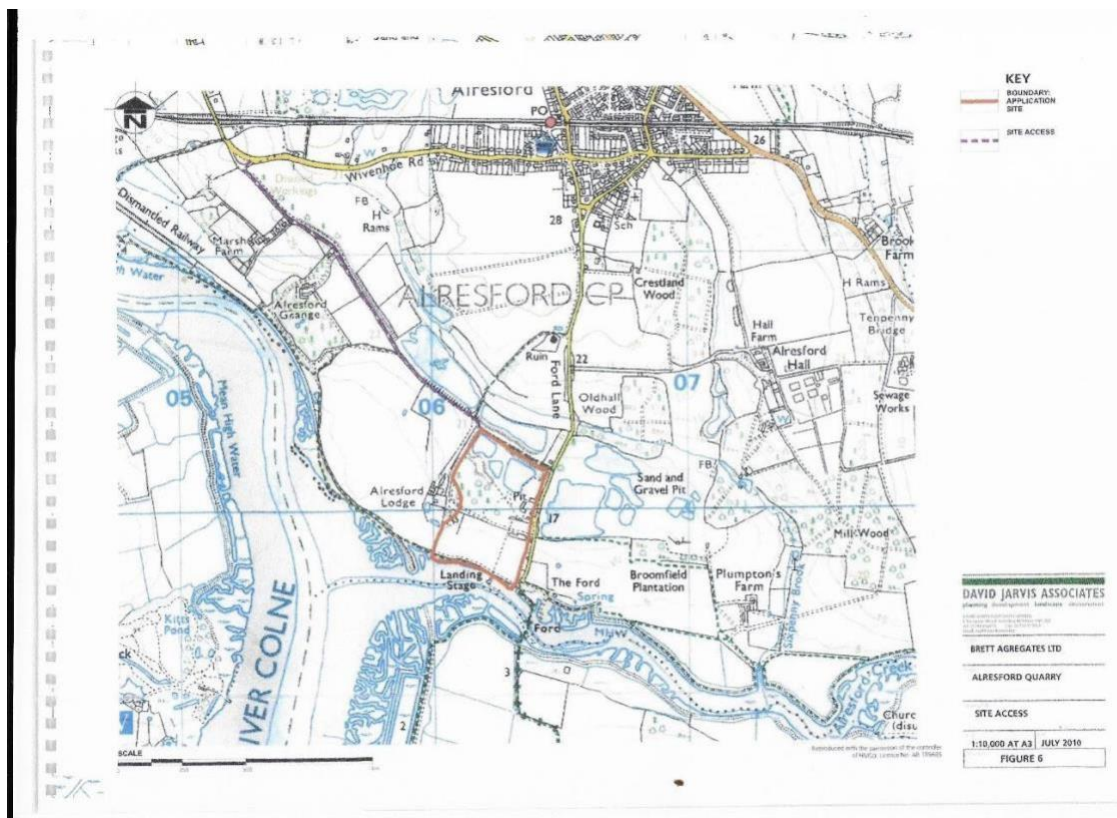
narrow roads which are unsuitable and pose a significant threat to the health and safety of pedestrians, cyclists, and motor vehicles. There will also be constant impact damage to this local road network.

In addition, the MPA seeks to minimise road mileage and also 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.

Use of haul road to/from Alresford Quarry is not sustainable. It was created over 30 years ago as a temporary (10 year) solution to a site transport problem. It was not dug out with adequate foundation laid and was merely cement laid over the existing gravel track. It already has limits on the number of vehicles that can use it. It is a single-track lane with badly positioned passing places.

Whilst the entrance gate width 3.8m is by 10cm wide enough to only allow emergency vehicle to access the remainder of the track is not wide enough to safely and adequately support the volume of HGV journeys that will be required. Most specifically previous quarrying has meant that a two-lane access road to support simultaneous entry and exit of HGV traffic is not physically possible.

Logically the haul road which is the only access to the site must be part of the actual site. The official site map in ECC permissions documents have not been upgraded to take account of the haul road which was constructed in the 1980's by Alresford Sand & Ballast. This means that approximately 10% of the site is missing from the official record and that the 8 properties on Marsh Farm Lane together with Grange Lodge House and Alresford Grange cannot benefit from HSE noise limits that apply to the site. This limitation also excludes the residents from automatic consultee rights on what matters from ECC and TDC planning processes regarding the quarry.



Map from 2010 Alresford Quarry ROMP.

Use of existing haul road Alresford Quarry to Wivenhoe Rd is neither safe nor sustainable for these sites. The 4m wide concrete track is sandwiched, only 1-2 metres distant in many places, between the PROW bridlepath on one side & 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 create unacceptable noise, dust, diesel & particulate levels, both for residents & 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 afternoon or Sundays when the 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 & 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 also residents of the Marsh Farm Community (10 residences, within 15-100 metre of the haul road) 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.

Creation of safe degree of splay for large numbers HGV exit & entry at junction of haul road/Wivenhoe Rd 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 & enter haul road simultaneously cannot be complied with, a highly dangerous buildup 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 & A71 sites would result in a massive increase in current HGV numbers, 140,000 40 tonne HGV movements would be necessary to move the proposed 2.8million tons of mineral during the active life of these new sites. such pressure on an unsafe & 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 Rd, there have been many "nearmiss" incidents when speeding HGV fail to respect the stop signs as they exit or cut the corner when turning in sharply from Wivenhoe Road.

It is imperative that a thorough HSE survey of this haul road from the Wivenhoe Rd entry onwards is made before ECCS considerations of the suitability of these Sites proceeds any further. Large sums of Public Money will be saved when these sites are swiftly removed, as they must be, on these multiple logistic and safety grounds.

8. Public Rights of Way – Green upgrade to Red

HGV noise means that the bridleway is no longer useable for horse riding apart from Saturday afternoons and Sundays.

Access to existing fishing lakes and car parks will be severely affected leading to loss of amenity.

The leisure facility 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 the 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.

9. Geo-Environmental – Green upgrade to Amber

The time taken to restore permaculture e.g. worms and other micro-organisms; 30 years plus to restore arable land to previous fertility levels.

Higher quality agricultural land requires more remedial work for restoration. This process takes a considerable amount of time (over 30 years) and means that the site is not fully productive as arable land until the restoration process is complete.

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

10. Hydrology, Hydrogeology and Drainage – Amber Properties on the Northern boundary in Wivenhoe Road have been assessed by Groundshore Environmental Engineers to have a ground water flood risk of moderate to high, leading to a high potential for subsidence due to de-watering through quarrying. See Appendix 1

Lowering of water table has an adverse effect on existing mature trees and several properties that are not connected to mains water.

Potential of water extraction license holders not being able to fulfil irrigation requirements.

Within the field, the water table has risen meaning that water will have to be pumped away. This will create an additional issue with noise and could lead to subsidence problems in and around the area.

A medieval pond is co sited to St Peters Church. This pond is spring fed via field drainage pipe work, the exact location of the spring and start of the pipework is unknown. It is strongly suspected that the spring is located within the area proposed for quarrying and as such its waters would find an alternative path and no longer sustain the pond at the church once quarrying work had commenced. This would lead to the loss of frogs and newts that currently exist there.

11. Air Quality – Green upgrade to Red

See Appendix 2 Letter from Dr Cope

Dust caused by daily excavation and transport is a major issue exacerbated by strong prevailing SW winds and a low flat site with no hedges. The primary school in Ford Lane and the nursery school in Wivenhoe Road are directly affected by this as there is no effective barrier between the site and the school buildings and playground areas. There are in addition a care home and 200 plus residential properties in Church Road, Ford Lane and Wivenhoe Road which will be directly affected by poorer air quality together with other new developments in proximity.

Appendix I relates "*The Site is more than 2km from an Air Quality Management Area and therefore is likely to have no impact on an air quality that requires mitigation.*"

Careful experimentation and subsequent monitoring would be needed for a quarry within 10m of homes.

On a related theme air quality is greatly affected by the increase in air pollution caused by diesel fumes and particulates from the greatly increased volumes of HGV traffic. The recent effective closure to HGV traffic at Alresford Viaduct on the B1027 has increased traffic having to divert through the village centre. This is exacerbated by drivers allowing their engines to idle as they wait for either of the automated railway crossings in the village to open.

It should also be recognised that people visiting St Peters on foot would have to walk pass 300 metres of the eastern boundary to the quarry, during which time they would be exposed to dust, noise and machinery plant fumes.

12. Soil Quality – Amber

Higher quality agricultural land requires more remedial work for restoration. This process takes a considerable amount of time (over 30 years) and means that the site is not fully productive as arable land until the restoration process is complete.

13. Services and Utilities – Amber/Green

No phone lines or gas but previous above ground 240v and 11KV electricity lines were moved underground in 2015. These cross the field from the rear of Church Farm and re-surface at a pylon at the rear of 160 Wivenhoe Road. Further investigation will be necessary to determine if electricity lines need to be moved before excavation commences.

14. Health and amenity upgrade to Red Appendix I relates.

*“One farm building is 20m west,
three residential buildings are 20m east,
four residential buildings are 30m east,
seven residential buildings are 30m north,
twelve residential buildings are 40m north,
two residential buildings are 40m northwest,
fifteen residential buildings are 50m north,
two residential building are 50m east and one commercial building is 50m north from the site.
One school is 80m east of the Site,
one care home is 40m northwest,
one care home is 80m northwest,
two commercial buildings are 70-90m north,
one nursery is 60m north, and two commercial buildings are 180m east of the Site.
Fifty-seven residential buildings are between 70-220m north,
fifty-two residential buildings are 60-250m east,
three residential buildings are 70-190m northwest
and one hundred and seven residential buildings are 60-250m northeast of the Site.
One community facility (place of worship) is 160m southeast.
One railway station is 230m northeast of the Site.*

The Site is not well screened from residential properties. The Site is likely to have a major impact on health and amenity and is likely to require high levels of mitigation to make the Site acceptable. “

Dust.

This is a common issue/problem for all sites. The solution appears to be keeping everything damp to stop dust being moved by any prevailing wind. Given that we are in the driest part of the UK it is not feasible to rely on rainwater so mechanical irrigation must be used. Evidence from Frank Belgrove (Chairman APC) regarding Alresford Quarry would suggest that mechanical irrigation of the site only takes place after residents have complained as opposed to being regularly undertaken as a preventative measure to avoid dust pollution and subsequent complaints.

There are potentially long-term health issues (Silicosis, asthma, CoPD and Lung cancer) regarding dust inhalation by humans.

Noise.

Noise will be generated from the site whilst sand and gravel are extracted from the site. It will also be affected by the prevailing south westerly wind which will direct it towards the centre of the village.

The largest cause of noise disturbance will be HGV traffic arriving and leaving the site to take away extracted sand and gravel. This noise will be heard in residential housing that lies alongside whatever route is used. This will obviously be affected by the working hours of the quarry.

The following video filmed on the Alresford Quarry haul road from the bridleway demonstrates this point.

[haul road week 51 2021 0](#)

Enjoyment of bridleway.

As mentioned previously horse riding has been greatly reduced as a result of noise from the Alresford Quarry haul which runs parallel to the bridleway. Prior to Covid and lockdown there were regular walkers, cyclists, and dog walkers probably than about 15 to 20 per day. Pedestrian traffic volume greatly increased during lockdown as quite simply it was a beautiful place to enjoy the countryside and get some exercise. Subject to good weather there are usually between 6 and 12 cars parked at the beginning of the bridleway indicating that at any point 20 plus people are actively using this amenity. This also applies to visitors and walking groups who access the bridleway from the Ford Lane entrance.

Schools.

In 2011 the census population of Alresford was 2,009 and by the 2021 census this had increased to 2,463. A corollary of this is that the number of children attending pre-school and primary school now stands at circa 350 children, a significant increase. This increase will continue as the village expands with extra house building. Both schools are situated extremely close to the border of the site, the Montessori is part of the border of the field and the Alresford pre and primary School is 26m away. The primary school was built in the 1960's and in summer months ventilation can only be provided by opening windows which would increase the amount of dust

entering the classrooms. Air conditioning would become a necessity for the school to operate safely.

Physical exercise and mental health.

The minerals 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, 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.

15. Green belt

Nothing to say – 27km from Metropolitan Green Belt

16. Airport safeguarding

Nothing to say.

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.

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 any actual site visits means that sites are included in the process when a simple site visit would have excluded the site e.g., proximity to residential housing; as significant cost to ECC 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 looks bigger than site map for A67 Church Farm.

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

Yield Section

Church Farm

The proposal is to extract 2mt from a 21-hectare site. The application made in 2011 was for 2mt from a 20-hectare site.

To achieve the proposed extraction whilst observing a 100-metre buffer zone to residential properties on the northern and eastern boundaries, would require the quarry to extend well beyond the field track by a size factor larger than that in the 2011 plan.

This would bring the quarry closer to St Peter's church and its associated graveyard to greater extent than in 2011. The required extra quarry space would also bring it into closer proximity to Six Penny Brook, itself requiring special consideration in terms of surplus water run off/drainage pollution and wildlife preservation. Additionally, the boundary would also require it to be qualified in meeting all RAMSAR requirements.

It is understood that ground testbore hole surveys were taken across the whole of the Church Farm site in the 1980's. These test bores varied widely in terms of the number taken over a specific area, a larger concentration being taken in the area adjacent to Six Penny brook compared to the area now proposed for quarrying.

The quarry work that commenced mid 1990's quickly identified the fallibility of the test bore surveys; the quality of material extracted not meeting the required standards. The quarrying was subsequently stopped, and the site restored to agricultural use before its planned end dig date.

It is therefore considered that the testbores taken on the proposed new quarry site are no guarantee as to the quality or tonnage that is available.

Taking all factors into consideration, the commercial viability of this site should be seriously questioned, considering the forgoing and the cost of mitigating all aspects that would require addressing.

Appendix 1 Subsidence Report

..\Downloads\Scan2024-03-07_GroundsureDocument.pdf

Appendix 2 Letter from Dr Cope

Dr A I Cope [REDACTED] Dr

S Cooper [REDACTED]

Dr P J Carr [REDACTED]

Dr A C McMahon [REDACTED]

[REDACTED]

[REDACTED]

12th February 2012

Minerals and Waste Planning
Environment, Sustainability and Highways Essex County
Council Freepost CL3636
E3 County Hall Chelmsford CM1 1QH Dear Sirs,

As an NHS General Practitioner, living in Alresford and with many patients in Alresford, I am writing to express concern about the proposed mineral extraction from the A16, Church Farm, Alresford site.

The site is close to a primary school, a kindergarten, and many homes. The population of around 2000 people live immediately to the Northeast of the site which has a prevailing South Westerly wind which will blow dust into the school and homes.

The concern comes from small particles of silica, less than 10 microns in diameter, which easily get into lungs then remain there permanently as the body is unable to expel the particles. The most obvious disease caused by silica is silicosis although this is rarely seen outside mineral workers. I am concerned by the potential of low-level exposure to silica to restrict development of the lungs in the children attending school and living locally. Children are at greater risk as they spend more time outside than adults, tend to breath more through the mouth than the nose which has better filtering, and have immature lungs and immune systems. Studies of young adults in India living near mineral works show a restriction in lung volume. I have been unable to find studies demonstrating safety or otherwise in situations similar to Alresford.

Asthma and chronic obstructive pulmonary disease are common respiratory diseases. Dust has been shown to worsen these conditions. It is hard to quantify how big an effect this might be as these conditions vary greatly between individuals. I am sure there will be some patients that are adversely affected by the dust.

Silica dust has also been implicated in the auto-immune diseases, Systemic sclerosis, Lupus, Rheumatoid Arthritis and Vasculitis. These are serious diseases causing great morbidity and significant resources to treat. Silica is a possible cause of lung cancer.

A small increase in risk causes a greater disease burden when many individuals are exposed. There is great uncertainty as to the safety, particularly when considering the many children living and

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Response from Alresford Parish Council

attending school in Alresford. I think that the Church Farm Site should not be quarried.

Yours faithfully

Dr Andrew Cope MB BS MRCP

References

Knowns and unknowns on burden of disease due to chemicals: a systematic review. *Environmental Health* 2011, 10:9 doi:10.1186/1476-069X-10-9 Annette Pruss-Ustun et al.

Mineral dust exposure in young Indian adults: an effect on lung growth? *Occup. Environ. Med.* 2008;65:306-310 D A Green

Air pollution and children's health. *Paediatrics* 2004 Apr;113(4 Suppl):1037-43. J Schwartz

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 & 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.

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.

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