

Land at Bellhouse Farm South

Candidate Site A95: Land at Bellhouse Farm South

CLARIFICATION DOCUMENT

SUMMARY

This document has been produced to allow:

Clarification of previously submitted information used by Stantec, for and on behalf of Essex County Council (ECC), to assess Candidate Sites A95 - Land at Bellhouse Farm South, together with supplementary information to allow a correct assessment of the site status to be made - for promotion within the Replacement Essex Minerals Local Plan 2025 - 2040 (MLP).

CONTENTS OF CONSULTATION REPORT

A Strategic Context

- Mineral Position of the Emerging Minerals Local Plan

B Methodology

Critical Review of Key Methodology Items set against standard practices for Mineral Development

- Landscape and Visual Sensitivity
- Transport and Access
- Soil Quality
- Services & Utilities
- Health & Amenities

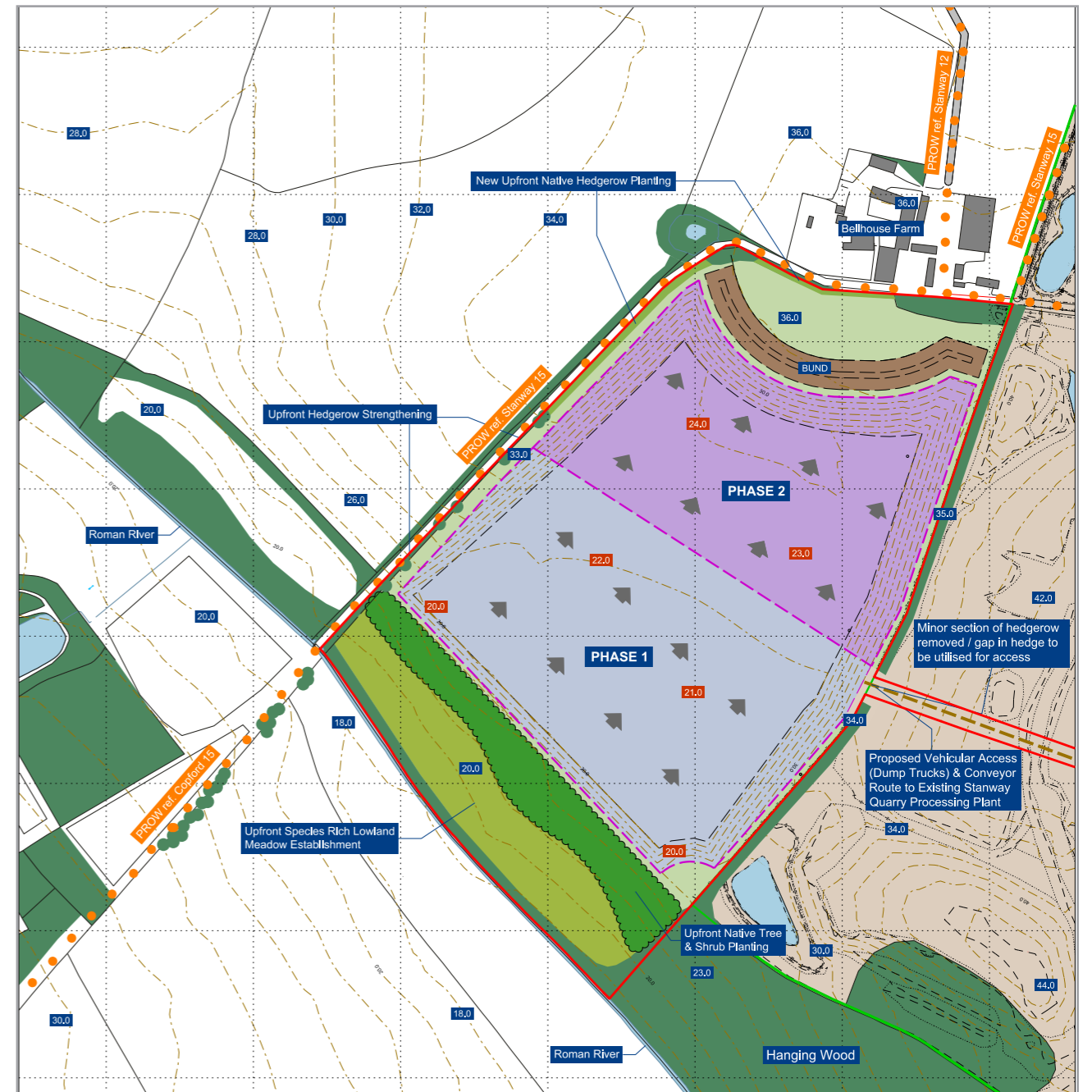
C RAG Assessment

- Justified re-assessment of the 16 technical aspects

E Summary of Re-Assessed Candidate Site against Comparable Sites

F Conclusions

SHEET No.



Legend

	Application Boundary		Upfront Permanent Native Tree & Shrub Planting
	Existing Trees, Hedgerows & Woodland		Upfront Permanent Species Rich Lowland Meadow
	Surrounding Roads, Tracks & Buildings		Upfront Permanent Native Hedgerow Planting
	Waterbodies & Courses		2m Contours & Spot Heights (m aOD)
	Agricultural Land within the Site Boundary		Existing Public Rights of Way (PROW)
	Proposed Limit of Extraction		Proposed Base of Mineral Extraction / Batter Slope Contours & Spot Heights (m aOD)
	Proposed Conveyor Routing		
	Proposed Development Phases 1 & 2 / Full Extraction Area / Base of Extraction		
	Proposed Direction of Working		



Site Name:
Land at Bellhouse Farm South

Drawing Name:
Proposed Mineral Extraction Block Phasing Plan
(Full Extraction Model)

Drawn By:
R. Duncan

Scale @ A3:
1:2,500



Candidate Site A95: Land at Bellhouse Farm South - Block Proposals Plan

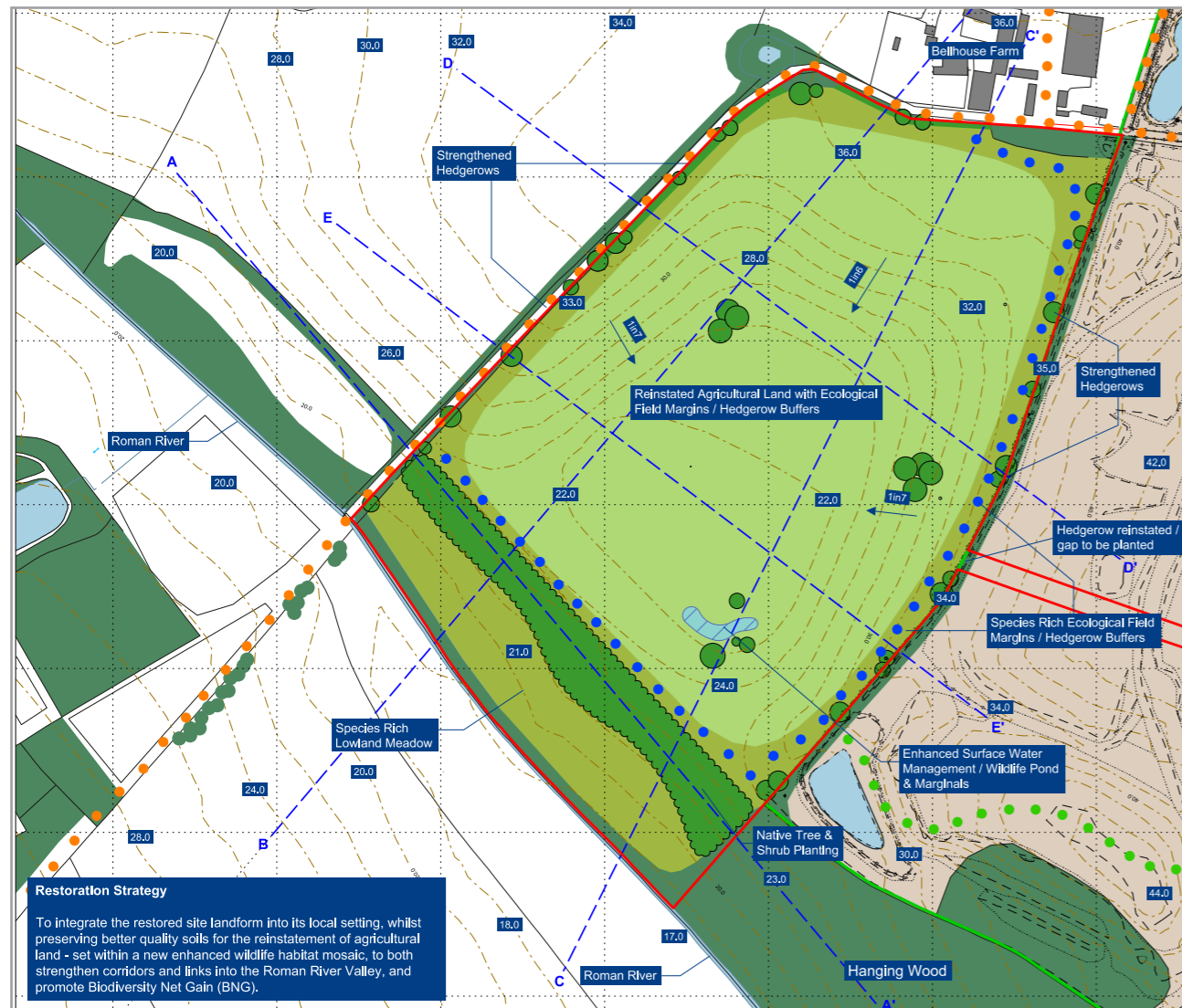
Land at Bellhouse Farm South
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Strategic Context



Legend	<ul style="list-style-type: none"> Application Boundary Existing Trees, Hedgerows & Woodland Surrounding Roads, Tracks & Buildings Waterbodies & Courses 	<ul style="list-style-type: none"> 2m Contours & Spot Heights (m aOD) Existing Public Rights of Way (PROW) Proposed New Public Right of Way (PROW) Approximate Alignment of Permitted PROW to be delivered within the existing Abbotstone / Bellhouse Quarry upon Restoration Restored Land Gradients Cross Section Locations (see Drawing No. KD.BELL.3.D.009) 	<p>TARMAC A CRH COMPANY</p>
<ul style="list-style-type: none"> Restoration Agricultural Land within the Site Boundary Native Tree & Shrub Planting - including Hedgerow Strengthening / Planting Species Rich Lowland Meadow & Ecological Field Margins / Hedgerow Buffers Enhanced Surface Water Management / Wildlife Pond & Marginals <p><small>Note: All land to be restored to its original soil profile and to productive agricultural land gradients of between 1in6 and 1in35</small></p>	<p>KEDD Limited</p> <p><small>Kedd Limited Fox Studio - King Street, Much Wenlock, Shropshire TF12 5QY</small></p>	<p>Site Name: Land at Bellhouse Farm South</p> <p>Drawing Name: Concept Restoration</p> <p>Drawn By: R. Duncan</p> <p>Date: 12.08.2023</p> <p>Scale @ A3: 1:2,500</p> <p>Drawing Number: KD.BELL.3.D.008</p>	

Candidate Site A95: Land at Bellhouse Farm South - Concept Restoration Plan

Following a review of the Plan in 2019, the Council determined a need to produce a new Minerals Local Plan. The emerging 'Replacement Essex Minerals Local Plan' (MLP) covers a plan period of 2025-2040. It is understood that whilst this Regulation 18 public consultation presents the Replacement Minerals Local Plan; including Plan provision figures and the assessments of submitted sites, this Draft Plan does not present a list of preferred site allocations to meet the newly quantified minerals need for the County.

As stated at paragraph 2.19 of the Replacement MLP, the majority (81%) of sand and gravel reserves extracted within Greater Essex are consumed within Greater Essex. In 2019, of the remaining 19% of reserve, 12% were exported to the remainder of East of England market, and 7% into 'elsewhere' within the UK. Regarding transport to market, most mineral is transport by HGV's on the road network, however there are two main rail transshipment sites within Essex (Harlow and Marks Tey – Tarmac operated).

Current operations at Colchester Quarry, for which Candidate Site A95 – Land at Bellhouse Farm South would be an extension of, provides for markets both local and further afield, see below:

- 36% - Onsite DM and RMX Plants;
- 60% - Into the Essex market, external plants and merchants; and,
- 4% - Transport by rail, via Marks Tey, into the Greater London markets.

As was stated within the Candidate Site Submission, the mineral extracted within the 'Land at Bellhouse Farm South' is to be transported, via mineral field conveyor, to the existing Colchester Quarry processing plant. The mineral conveyor is proposed to connect to the existing field conveyor within the Bellhouse / Abbotstone Quarry area, passing beneath Warren Lane and connecting directly into the plant site.

The estimated yield after processing the mineral within the extension area comprises approximately 838,000 tonnes of Sand and Gravel. Mineral extraction is anticipated to be completed within 2 years.

The proposed restoration of the site is largely back to agricultural land, with an area of species rich grassland / lowland meadow and additional / strengthened hedgerows and woodland planting.

In December 2023, a Planning Application (Ref:ESS/113/23/COL) was submitted for extraction of the mineral within Candidate Site A95.

In support of the Environmental Impact Assessment, the following works were undertaken and submitted in support of the application:

- Landscape and Visual Impact Assessment;
- Nature Conservation and Ecology;
 - Preliminary Ecological Appraisal Report;
 - Breeding Bird survey Report;
 - Wintering Bird Survey Report;
 - Reptile Survey Report;
 - Otter and Water Voles Survey Report;
 - Bat Activity and Roost Survey Report;
 - Invertebrate Survey Report;
 - Badger Survey Report;
 - Great Crested Newt eDNA Report
 - Habitat Regulations Assessment;
 - Biodiversity Net Gain Assessment;
 - Ancient Woodland Assessment; and
 - Arboricultural Survey Report.
- Noise Assessment;
- Air Quality Assessment;
- Cultural Heritage Assessment;
- Transport Statement;
- The Impact on Water Resources; and
 - Hydrological and Hydrogeological Impact Assessment; and,
 - Flood Risk Assessment.
- Agricultural Land Classification and Soil Resources.

In addition to the assessment work above, the following plans accompanied the Planning Application:

- Site Location Plan: Drawing No. KD.BELL.3.D.001;
- Application Site Plan: Drawing No. KD.BELL.3.D.002;
- Context Plan: Drawing No. KD.BELL.3.D.003;
- Current Situation: Drawing No. KD.BELL.3.D.004;
- Block Proposals Plan: Drawing No. KD.BELL.3.D.005;
- Phase 1: Drawing No. KD.BELL.3.D.006;
- Phase 2: Drawing No. KD.BELL.3.D.007;
- Concept Restoration: Drawing No. KD.BELL.3.D.008; and,
- Cross Sections: Drawing No. KD.BELL.3.D.009

Land at Bellhouse Farm South

Candidate Site A95: Land at Bellhouse Farm South

SUMMARY SHEET

This sheet is a summary of Essex County Council's initially assessed 'RAG Measurement' of Candidate A61 and A62, together with Tarmac's responses, with clarification, reasoning and re-assessment utilising the RAG methodology. Consideration and critique of the RAG methodology is also included within the table below.

ECC RAG CRITERIA	INITIALLY ASSESSED MEASUREMENT BY ECC	REASONS WHY THE ECC MEASUREMENT IS EITHER WRONG OR INACCURATE	RE-ASSESSED MEASUREMENT BY TARMAC AND THEIR CONSULTANTS USING THE RAG METHODOLOGY	COMMENTS
Landscape Character & Visual Amenity	RED / AMBER	<ul style="list-style-type: none"> Methodology - The RAG methodology placed great emphasis on only one aspect of assessment i.e. 'Sensitivity'. This is only part of the process. There is minimal consideration of the actual 'Magnitude of Effect' (the potential size, scale reversibility) of the potential development change. As such, the actual level of potential 'Significance of Effect' has not been quantified through the RAG process and assessment measurement. Mitigation - the proposed fully integrated mitigation measures within the submitted Candidate Site A61 and A62 schemes i.e. advanced tree and shrub and species grassland planting, minor soil screen bunding, phased working and restoration, have not been fully assessed by the RAG measurement. Enhancement - the amenity benefits of the proposals have not been considered or assessed. Provision of of new habitat, including advanced works, to promote Biodiversity Net Gain (BNG) of 40.92%. 	<p>Landscape Character: Medium</p> <p>Visual Amenity: Medium</p> <p>Overall for Criteria: AMBER</p>	<p>The RAG overall emphasis on Sensitivity and not considering the potential for mitigation and enhancement, has lead to an inaccurate and unsound assessment of Candidate Site A95. When mitigation / enhancement and the actual Magnitude of Effects of the proposed Candidate Site are actually considered, it is assessed that the re-measurement should be AMBER.</p>
Biodiversity	RED / AMBER	<ul style="list-style-type: none"> The RAG methodology is in a tabulated format split into five individual considerations. There is no clarity provided within the scoring for each of the areas to demonstrate how they reached the conclusion to consider the impact AMBER. It appears that the full suite of technical information submitted in support of the Candidate Site Submission has not been fully considered. For example, impacts to priority habitats (hedgerow) and neighbouring Ancient Woodland is an area focused on in the RAG assessment with regard to direct loss. The RAG assessment fails to consider the mitigating factors of advanced planting, progressive working and restoration ensuring not all of the habitat is affected at one time, and that post restoration there would be an increased quantity of priority habitat compared to the current situation. 	<p>AMBER / GREEN</p>	<p>Since the submission of the initial Candidate Site, full Environmental Impact Assessment work has been conducted and submitted providing detailed justification of a reduced RAG Assessment:</p> <ul style="list-style-type: none"> Level of likely ecological impact and level of mitigation required - Measures required for mitigation involves typical quarry features such as standoffs and screening bunds. Post Restoration features will also provide mitigation / benefit including 40.92% Biodiversity Net Gain. AMBER / GREEN; Impact to International or National designations - The site lies outside of Site of Special Scientific Interest Minerals Buffer Zone, Special Protection Areas and Ramsar Sites. GREEN;

Land at Heckfordbridge

Candidate Sites A61: Heckfordbridge Site 1 and A62: Heckfordbridge Site 2

SUMMARY SHEET

ECC RAG CRITERIA	INITIALLY ASSESSED MEASUREMENT BY ECC	REASONS WHY THE ECC MEASUREMENT IS EITHER WRONG OR INACCURATE	RE-ASSESSED MEASUREMENT BY TARMAC AND THEIR CONSULTANTS USING THE RAG METHODOLOGY	COMMENTS
		<ul style="list-style-type: none"> A Habitats Regulations Assessment was prepared and submitted in support of the planning application for Bellhouse Farm South, which concluded that the site will have no direct impacts on designated sites. Additionally, Natural England have provided a consultee response to the planning application (14th February 2024), stating no objection to the proposed scheme as they are satisfied there will not be significant adverse impacts on European / International sites. The Council Ecologist, within their response to the application, agree that there are not likely to be significant effects and support the conclusions of the Habitat Regulations Assessment. 		<ul style="list-style-type: none"> Level of mitigation required subject to a Habitat Regulations Assessment - The site lies outside of European Protected Sites and Buffer Zones. GREEN; Impact to irreplaceable habitats - Due to the proximity of the Candidate Site operations to the Ancient Woodland, an Ancient Woodland Assessment was undertaken as part of the application works. This concluded that the site could have moderate impacts upon irreplaceable habitats (ancient woodland). AMBER / GREEN; and, Impact to local designations and priority species - As set out in the submitted planning application documentation, to accommodate the proposed development, a section of only ~20m of hedgerow / would require removal to allow access to the conveyor and into the site. This is part of the hedgerow that forms the field boundaries to the Bellhouse landfill site to the east. It is not anticipated that the removal of this 20m section will have any impact as this was assessed as a Category C hedgerow and only a small section is to be removed. In terms of potential impact to Gol Grove / Hanging Wood has been explored. AMBER / GREEN
Historic Buildings	RED	<ul style="list-style-type: none"> The RAG assessment does not take into account that mitigation to ensure an acceptable level of impact can be easily implemented, as illustrated on the submitted Block Phasing Plan. 	AMBER / GREEN	<ul style="list-style-type: none"> There are a total of seven Listed Buildings within close proximity to the site, as identified within the RAG assessment. The submitted Block Phasing Plan illustrates a 80m standoff to the closest of these listed buildings (Bellhouse Farmhouse and Barns). All other listed buildings benefit from ever greater standoff distances / seperation distances as they lie beyond the woodland and river to the south of the site. Mitigation measures to ensure an acceptable level of impact are easily implemented and typical features of a mineral operation. The Heritage Officers agrees with the assessment of the Bellhouse Farm group and Copford Hall group of listed buildings, and subject to implementation of suggested conditions, is agreeable to the Upper Hill Farmhouse assessment.

Land at Bellhouse Farm South

Candidate Site A95: Land at Bellhouse Farm South



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Candidate Site A95: Land at Bellhouse Farm South

SUMMARY SHEET

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Archaeology	AMBER	<ul style="list-style-type: none"> We agree with the RAG Assessment. 	AMBER	<ul style="list-style-type: none"> Mineral development at the site is not anticipated to result in larger than moderate impact, following comprehensive field-based evaluation. Mitigation of impact would be achievable. The Council Archaeologist concurs with the assessment.
Flooding	AMBER	<ul style="list-style-type: none"> We agree with the RAG Assessment. 	AMBER / GREEN	<ul style="list-style-type: none"> Whilst we agree with the RAG grade, it is worth noting that the Strategic Flood Risk Assessment is split into 1km grid squares, therefore not accurate to a site specific level. The Hydrological & Hydrogeological Impact Assessment states: "impacts upon groundwater levels and flows may affect surface water levels and flows where groundwater dependent. As discussed, water features, including the Roman River, in meaningful proximity to the Site are not in direct hydraulic continuity with the Site. Further, intercepted such waters will be returned to ground without intervening consumptive use and will remain available as baseflow to the Roman River. Impacts in this regard are thus not anticipated"
Transport	AMBER	<p>Whilst we agree with the grading provided, there are a number issues raised regarding the methodology which applies to both Transport and Access:</p> <ul style="list-style-type: none"> The RAG Assessment considers the impacts of the proposed mineral field conveyor under 'Access'. This is outside the scope of the methodology provided for Access, and we feel better suited to be considered under Transport; As the conveyor is the means of transport for mineral from source to the processing plant, it would be better suited to assessment as part of the Transport section; The RAG Assessment solely consider the categorisation of the road and do not provide allowances for instances where certain category roads have been upgraded to accommodate particular vehicle movements. In this case upgrade of Warren Lane for the HGV movements. 	AMBER / GREEN	<ul style="list-style-type: none"> Against the strict methodology, Transport would be Amber due to Warren Lane being classified as a 'Secondary Distributor Route'. However, Warren Lane has been improved to accommodate HGV movements, and it provides the Quarry access to the Strategic Highway Network (A12) without the need to pass through residential areas due to the connectivity provided by the Stanway Western Bypass; Furthermore, the Council Highways Department had no comments to make on the proposal
Access	GREEN	<ul style="list-style-type: none"> We agree with the RAG Assessment. 	GREEN	<ul style="list-style-type: none"> Mineral will leave Colchester Quarry to enter the market via the existing Warren Lane access point.

Land at Bellhouse Farm South

Candidate Sites A95: Land at Bellhouse Farm South

SUMMARY SHEET

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Public Rights of Way	GREEN	<ul style="list-style-type: none"> We agree with the RAG Assessment. 	GREEN	<ul style="list-style-type: none"> As stated in the RAG Assessment "PROW 128_12 and PROW 149_15 are 5m west of the Site. PROW 149_12 is 5m north of the Site. There are no PROWs within or bordering the Site. The Site is likely to have no impact on PROWs that requires mitigation." Nonetheless, mitigation measures have been included within the submitted planning application which includes planting of 240 linear metres of new hedgerow along the western and northern boundaries of the site, and species diversifying / beating up of approximately 180 linear metres of existing hedgerow. This will provide an increased level of screening for the users of the PROW.
Geo-Environmental	GREEN	<ul style="list-style-type: none"> We agree with the RAG Assessment. 	GREEN	<ul style="list-style-type: none"> As stated in the RAG Assessment, the site is more than 20m from a Local Geological Site and therefore is likely to have no impact on the geological environment that requires mitigation as geological features will be preserved and maintained.
Hydrology, Hydrogeology & Drainage	RED / AMBER	<ul style="list-style-type: none"> Following the production of Hydrological & Hydrogeological Impact Assessment the RAG Assessment produced by the MPA is overly critical of the Candidate Site. 	AMBER	<ul style="list-style-type: none"> Impacts upon groundwater levels and flows may affect surface water levels and flows where groundwater dependent. As discussed, water features, including the Roman River, in meaningful proximity to the Site are not in direct hydraulic continuity with the Site. Further, intercepted such waters will be returned to ground without intervening consumptive use and will remain available as baseflow to the Roman River. Impacts in this regard are thus not anticipated." Mitigation measures that include best practice to limit risk of groundwater quality degradation via accidental spillages / leakage of fuels / oils / solvents would be implemented. Furthermore a Hydrometric Monitoring Scheme (HMS) will be produced and implemented.
Air Quality	GREEN	<ul style="list-style-type: none"> We agree with the RAG Assessment. 	GREEN	<ul style="list-style-type: none"> As stated in the RAG Assessment, the site is more than 2km from an Air Quality Management Areas and therefore is likely to have no impact on air quality that requires mitigation.

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Soil Quality	AMBER	<ul style="list-style-type: none"> Detailed assessment work has found the initial RAG Assessment to be incorrect. 	AMBER / GREEN	<ul style="list-style-type: none"> The Agricultural Land Classification and Soil Resources Report submitted in support of the planning application at the Candidate Site finds that the site consists of approximately 48% Grade 3a, 51% Grade 3b and 1% Non-Agricultural Land. In accordance with the RAG Methodology the Candidate Site should rank Amber / Green in this regard.
Services & Utilities	RED / AMBER	<ul style="list-style-type: none"> The methodology is overly restrictive and does not account for the fact the presence of these services within a mineral site is not uncommon. Where these services are located, discussions would be held with the relevant stakeholders to agree appropriate ways to address the situation, be that through standoffs to the cables / pipes or to have the routes relocated. Whilst it could involve significant engineering works, it is achievable. 	AMBER	<ul style="list-style-type: none"> A number of services / utilities companies have provided consultation responses in relation to the planning application; including Lumen Technologies Plan, BPA, Colt Technologies Services, ESP Utilities, GTC Apparatus, Anglian Water, UK Power Networks and Northumbrian Water for which no issues have been raised. Cadent Gas have responded with a document demonstrating that there are no pipes within the site boundary and informed that they would assess the proposals in house before commenting further.
Health & Amenity	RED	<ul style="list-style-type: none"> The main point to raise here is that the RAG Assessment based the Sensitivity only on the red line boundary submitted as part of the Candidate Site Submission as opposed to the associated Block Phasing Plan submitted which highlights standoff distances from extraction limits and achievable mitigation measures. 	AMBER	<ul style="list-style-type: none"> Mitigation measures to make aspects such as dust and noise acceptable are relatively simple and typical of a mineral extraction operation. Aspects of these have been included within the submitted Block Phasing Plan which includes for standoffs of at least 80m between residential receptors and the extraction limits. In addition to this, the stand-off areas will include presence of either screening bunds or advanced tree and shrub planting, or both; and, Due to this mitigation being relatively easy to implement we suggest a AMBER assessment.
Green Belt	GREEN	<ul style="list-style-type: none"> We agree with the RAG Assessment. 	GREEN	<ul style="list-style-type: none"> As stated in the MPA Assessment, the site is not within Green Belt. The nearest Green Belt is 24.1km away. The site is likely to have no impact on preservation of the openness of the Green Belt that requires mitigation and would not conflict with the purpose of including land within it.
Airport Safeguarding Zones	GREEN	<ul style="list-style-type: none"> We agree with the RAG Assessment. 	GREEN	<ul style="list-style-type: none"> As stated in the RAG Assessment, the site is not within an Airport Safeguarding Zone. The nearest Airport Safeguarding Zone is 7.6km away. The site is likely to have no impacts on aircraft safety that require mitigation and would not increase the risk of bird strikes for aircraft.

Land at Bellhouse Farm South

Candidate Sites A95: Land at Bellhouse Farm South

Summary & Conclusion

Criteria	A95 – Land at Bellhouse Farm South	A95 – Land at Bellhouse Farm South (Re-assessed)
Landscape and Visual Sensitivity	Red / Amber	Amber
Biodiversity	Red / Amber	Amber / Green
Historic Buildings	Red	Amber / Green
Archaeology	Amber	Amber
Flooding	Amber	Amber / Green
Transport	Amber	Amber
Access	Green	Green
Public Rights of Way	Green	Green
Geo-Environmental	Green	Green
Hydrology, Hydrogeology and Drainage	Red / Amber	Amber
Air Quality	Green	Green
Soil Quality	Amber	Amber / Green
Services & Utilities	Red / Amber	Amber
Health & Amenity	Red	Amber
Green Belt	Green	Green
Airport Safeguarding Zones	Green	Green

This report provides a justified re-assessment of Land at Bellhouse Farm South utilising the Methodologies produced by Essex County Council in the 'Assessment of Candidate Sand and Gravel Sites' which form part of the current Regulation 18 Consultation of the Review of the Essex Minerals Local Plan 2014.

We have reviewed the extensive consultation material published by Essex County Council, including the Replacement Minerals Local Plan, Assessment of Candidate Sites, Assessment Methodologies and Sustainability Appraisal, with particular focus given to the RAG assessment of the Candidate Site A95 – Land at Bellhouse Farm South.

Since the initial submission of the Candidate Site in March 2022, an Environmental Impact Assessment has been prepared and submitted for the 830,000 tonnes within the Candidate Site land (Planning Application Ref: ESS/113/23/COL). It is aimed, subject to achieving planning permission that the mineral within the extension are will enter market in 2025.

The Replacement MLP was received to understand the mineral need position of Essex County Council. Looking at the total tonnage of sand and gravel required to be allocated within the Replacement MLP, it is identified that in order to demonstrate a 7 year landbank at the end of the plan period (2040), that a total of 87.56 million tonnes of resource is needed to be allocated. This is under the assumption that annual sales will total the annual apportionment of the Replacement MLP, of 3.98Mtpa.

The MPA do not seek to allocate the full 87.56mt through the Replacement MLP as there is existing permitted reserve. It is anticipated that at the time of adoption in 2025, there will be a permitted reserve of 22.95mt. This would leave a requirement of 64.56mt to be allocated through the Replacement MLP.

We question whether a number of the methodologies used in the assessment of the Candidate Sites are fully fit for purpose. Where issues are raised (namely Landscape and Visual Sensitivity, Transport, Access, Soil Quality, Services and Utilities, and Health and Amenity), justification is provided as to why, and where appropriate alternate suggestions are made.

Following our re-assessment of the RAG Grades against the published methodologies, we found that in an number of cases, the RAG assessment was overly critical and could justifiably be lowered. Where we have provided an assessment of reduced impact this has been evidenced using the assessment work conducted in support of the submitted Environmental Impact Assessment.

Whilst we agreed with the RAG assessment for Archaeology, Transport, Access, Public Rights of Way, Geo-Environmental, Air Quality, Services & Utilities, Green Belt and Airport Safeguarding Zone; we found the assessment could be justifiably lowered for Landscape & Visual, Biodiversity, Historic Buildings, Flooding, Hydrology, Hydrogeology and Drainage, Soil Quality and Health & Amenity.

For a number of the elements which we agreed with the RAG Assessment, we believe had the methodologies been more fit for purpose then the assessment could have been lowered.

Overall, as can be seen from the Summary Table, Candidate Site A95 justifiably performs well. Resultingly, we request that Land at Bellhouse Farm South (Candidate Site A95) be allocated within the Replacement Minerals Local Plan 2040.