

## Appendix B - Ecology (Susan Deakin Ecology)

### 1. INTRODUCTION

The following statement has been provided by Susan Deakin, a suitably qualified ecologist, with over 30 years of experience. Susan has particular expertise in providing ecological assessments, acting as an Expert Witness and preparing appropriate schemes of ecological enhancement and mitigation, along with conservation management strategies, designed to offset potential ecological impacts.

The aim of the assessment is to present this re-worked scheme (incorporating a significantly higher level of buffer provision and other in-built scheme mitigation) against the current R-A-G (Red- Amber- Green) assessment for the site. The R-A-G assessment method accords with the stipulations of 'Appendix C. Biodiversity Detailed Assessment Methodology and Results of Consolidated Methodologies, Table 2. Biodiversity RAG Sensitivity Grade Table'. The R-A-G assessment provided for the original Site A58 scheme recorded a Red - Amber predicted grade of ecological impact. This grade is defined as follows:

- Ecological impacts are likely to be major and is likely to require high levels of mitigation to make the Site acceptable.
- This site could have a major impact upon international or national designations and is likely to require high levels of mitigation to make the Site acceptable.
- Subject to plan-level Habitats Regulations Assessment, the adverse effects on the integrity of internationally important wildlife sites could be avoidable with significant levels of appropriate mitigation.
- The Site could have major impacts upon irreplaceable habitats.
- The Site could have a serious impact upon the natural environment including local designations and Priority habitats and species.

The assessment of Candidate Site A58, known as Little Smiths, has been carried out using the results of desk study and also with the benefit of a walkover survey carried out on 4.3.2024.

There follows in Section 2 an independent appraisal of biodiversity issues, including potential impacts and ecological constraints, associated with Candidate Site A58 and its environs. This includes the potential for cumulative impacts associated with other existing and/or candidate mineral extraction sites, specifically the existing and extant mineral extraction sites located to the south of Site A58, comprising the Royal Oak Quarry, Phases 1, 2, 3 and 4. This appraisal is linked to proposals to integrate substantive in-scheme mitigation, specifically in the form of increased stand-off provision to buffer sensitive adjacent habitats, and thus to counter any potential impacts. These in-scheme proposals combined with additional mitigation measures are set out in Section 3.

The final section of the statement explores the implications of the in-scheme mitigation proposals and additional mitigation on the R-A-G grading for Site A58.

### BIODIVERSITY ISSUES

## Ecological Constraints

The linear A58 site comprises open agricultural land under intensive arable production. It is bounded by a small stream on its southern boundary, Thrift wood to the east and hedgerows on the remaining northern and western boundaries.

### Thrift Wood

The site is bordered on its eastern boundary by Thrift Wood Local Wildlife Site (LoWS) (reference Ma7). This is Ancient Replanted Woodland (Priority Habitat: Deciduous Woodland) with a good woodland structure, variably dominated by mature sweet chestnut (formerly coppiced), with a local distribution of standard and some formerly coppiced oak, hornbeam and birch, with occasional pine standards. It supports a generally good floral assemblage including an assemblage of ancient woodland indicator species and other characteristic woodland species such as bluebell, wood anemone, foxglove, dog's mercury, celandine and wild daffodil. The northern section of the Thrift Wood boundary has a banked and shallow ditch structure characteristic of ancient woodland. Ancient woodland is classed as irreplaceable habitat.

There is a candidate Veteran oak tree on the edge of Thrift Wood facing the site, which has some of the required Veteran features and with potential to develop further features during the lifetime of the tree. Veteran trees are also classed as irreplaceable habitat.

### Potential Pollution Links

The southern boundary of the site comprises a small, narrow, generally deeply set, partially wet stream (channel width 0.5-0.7m), with sporadic scrub growth including elder, willow and hawthorn, and a mature willow towards the western end of the boundary. There has been some dumping of domestic fly tipping and ingress of the invasive hemlock along the stream, which flows eastwards into the adjacent Thrift Wood LoWS and thence through the woodland to the east. Within the wood there has been some natural damming of the stream with vegetative debris. The watercourse from thence flows north and eastwards for some 4km mainly through farmland and flows into the River Chelmer through the urban area of Maldon, to the designated Blackwater Estuary, a further approximately 4km, to the east, ie some 8km distant.

The direct distance cross country between the site and the Blackwater Estuary is some 4.5km. The Blackwater Estuary is an SSSI and also a European designated site; a Special Protection Area (SPA), a Ramsar site and forms part of the Essex Estuaries Special Area of Conservation (SAC).

### Other Habitat Issues

The northern and western boundaries of the site are bordered by mature hedgerows, comprising Priority Habitat, albeit variably gappy, with mature standard trees, mainly oak.

There is a candidate Veteran oak tree on the western site boundary.

The site is within the Impact Risk Zone of the Woodham Walter Common SSSI, which is located approximately 1km to the north-west of the site. There is considered to be some habitat connectivity between the site and this SSSI, via a golf course and open farmland. Two other SSSIs are located over 1km to the east/ south-east of the site beyond Maldon, with limited habitat connectivity.

Warren Pit LoWS (reference Ma8) is located approximately 100m to the north of the site, beyond Herbage Park Road. This is a former sand and gravel pit supporting in part a mosaic of grassland, scrub and wetland, with some adjacent semi-natural woodland of likely ancient origin. It has been developed as part of a Golf and Country Club with holiday / residential lodges. There are 2 other

LoWS at further distance from the site.

### Potential Impacts

The proposed extraction process at the Site A58 would cause direct, temporary losses of land under intensive arable land of likely low ecological interest. At the application stage the potential for the site to support Priority farmland species eg skylark and brown hare would be investigated through appropriate survey. There would be no direct losses of the adjacent hedgerows, woodland or small stream (which is culverted in one section to allow agricultural access).

There is acknowledged potential for an extraction scheme on Site A58 to cause indirect adverse impact on adjacent and nearby habitats. In the absence of an integrated scheme of mitigation (see below) and based on information contained in the current 'Call for Sites' pro-forma and as discussed in the original R-A-G assessment, potential ecological impacts could include:

- Hydrological change to ground water dependent habitats including the adjacent ancient woodland LoWS (Thrift Wood), candidate Veteran and other mature trees, hedges and the southern boundary stream.
- Dust, siltation and other physical disturbance caused by the extraction process, resulting in smothering of vegetation and siltation / runoff pollution affecting the small stream.
- Noise, vibration, lighting and other disturbance affecting adjacent habitats and species.
- Temporary disturbance / losses of farmland habitat for any Priority farmland species present.
- Temporary disturbance to Protected and Priority woodland and hedgerow species using the adjacent habitats eg bats.
- Potential impact to the European designated Blackwater Estuary / Essex Estuaries, through the southern stream forming a pollution pathway to the estuary.
- Potential impacts to other off-site habitats in the wider environs of the A58 site, including Woodham Walter Common SSSI and two other SSSIs beyond the urban areas of Danbury, and also Warren Pit and other LoWSs in the wider vicinity of the site.

Cumulative Impacts with other Existing and/or Candidate Mineral Extraction Sites

Site A58, if consented, would effectively form an extension to the extant and in part operational, Royal Oak Quarry to the south and the workings would be carried out in a similar manner to the existing site operations, with inert waste being used as part of the restoration.

Existing quarrying is in progress (Royal Oak Quarry Phases 1, 2 and 3) to the south of Thrift Wood and there is extant permission for extraction (Phase 4) to the immediate south of Site A58, as yet unworked.. There is thus potential for cumulative impact on Thrift Wood ancient woodland, in terms of disturbance and alteration to the water table in the long term. There is also potential for cumulative impacts regarding loss of adjacent areas of farmland habitats and also on the southern stream and thus posing a potential risk to the Blackwater Estuary, at some distance from the site, if different phases were worked simultaneously.

However, a number of factors combine to alleviate any such potential impacts, as follows:

Condition 45 of the extant planning permission for Phase 4 of Royal Oak Quarry (ESS/35/17/MAL dated 12 March 2018) states:

‘No extraction shall take place in the saturated zone below the water table within Phase IV.

Reason: To ensure the integrity of the existing land drainage regime and to prevent contamination of the soil resource and pollution of the land Drainage and groundwater regime having regard to The Essex Minerals Local Plan Adopted July 2014 Policies DM1, DM2, S10 and S12 and the National Planning Policy Framework in respect of ensuring that permitted development does not give rise to unacceptable environmental impacts on the environment.’

It is considered appropriate that a similar planning condition regarding working above the water table, is applied to Site 58, if this site proceeds as a Preferred Site. This working method would prevent any changes to the hydrology of the adjacent Thrift Wood and other land drainage systems in the area and eliminate concerns over alteration to the ground water dependent character of the woodland and avoid cumulative effects on Thrift Wood ancient woodland in this respect.

In terms of phased restoration, whilst it is acknowledged that the wider quarrying system has to be continuous, there will be no extraction within Site A58 until restoration of Phases 1, 2 and 3 is completed and extraction of Phase 4 has ceased, and infilling has commenced. This would further mitigate potential cumulative impacts on Thrift Wood and the stream. This approach would accord with Planning condition 10 of ESS/35/17/MAL, for Phase 4 which states:

‘There shall be no extraction within phase IV until restoration of phases I and II is completed and extraction and infilling of phase III has commenced.

Reason: To restrict the extent of the operations in accordance with the planning application and to enable the Mineral Planning Authority to retain control over operations at the site and secure restoration, having regard to the National Planning Policy Framework/ and its Technical Guidance on Restoration and Aftercare of

mineral sites that seeks to minimise the adverse effect of mineral workings within the environment and that restoration and aftercare of mineral sites is achieved at the earliest opportunity, to a high standard having regard to Policies S12 of the Essex Minerals Local Plan Adopted July 2014.'

The potential for cumulative impacts would therefore be substantially alleviated through achieving site restoration/habitat creation within the completed phases of the overall quarry as quickly as possible. The consequential phases would be worked and restored progressively in an appropriate and sympathetic sequence, minimising adverse ecological effects and avoiding simultaneous extensive loss/disturbance of habitats and reduction in the network of connecting habitats, thus allowing for ongoing movement of species around the site and the wider landscape.

The potential for other cumulative impacts such as dust, noise, lighting, and other disturbance would also be minimised through adopting a carefully planned, phased programme of extraction and adopting the detailed mitigation measures set out below, potentially in much the same way as set out in the extant planning permission covering the existing operational areas and the unworked land also with planning permission to the immediate south of A58 (Phase 4).

It is also noted that Site A58 and an alternative candidate mineral extraction site (A66 White House Farm) are both situated adjacent / close to the same small watercourse, which eventually feeds into the River Chelmer and the Blackwater Estuary beyond. Therefore, cumulative effects regarding water quality are possible. However, as set out below, the mitigation and stream protection measures proposed for Site 58 are expected to ensure that there will be no predicted adverse effects on the receiving waters of the small stream of any significance.

Overall, it is considered that the above measures, to be secured through planning condition, would substantially limit the level of potential cumulative adverse ecological impacts, to a moderate level at the most.

### 3. MITIGATION

In order for the proposed A58 scheme to be seen as a viable proposition in ecological terms, it will be necessary for scheme proposals to include integrated mitigation measures and assurances secured through planning condition. These measures, outlined below, aim to demonstrate that the hydrology of the ancient woodland and candidate Veteran trees, the stream and other adjacent habitats would remain unaffected by the extraction proposals and that other adverse potential impacts would be limited to a moderate or minor level.

To this end the following mitigation measures are proposed to be implemented during the lifetime of the extraction scheme at Site A58 (these significantly exceed the provisions previously set out in the 'Call for Sites' pro-forma):

- Provision of an undisturbed buffer of minimum width 15m along the eastern site boundary, to protect Thrift Wood ancient woodland/LoWS from disturbance. This is substantially greater than the 10m proposed in the 'Call for Sites' pro-forma and would ensure that the Root Protection Area of the margins of the woodland are fully

protected and that (combined with the restriction on working depth) the ground water dependent woodland habitat would remain unaffected by the extraction process. It would also provide a stand-off protecting wildlife using the woodland eg bats and nesting birds and woodland flora, from disturbance. The width of buffer would be determined through discussions with, and assessment by the Project Hydrologist, to ensure that there would be no alteration to the hydrology of the ancient woodland and may exceed 15m in places.

NOTE. This accords with current best practice as set out in the following government guidance note: 'Ancient woodland, ancient trees and veteran trees: advice for making planning decisions', Natural England and Forestry Commission (14th January 2022).

- Provision of a minimum 10m undisturbed buffer adjacent to the southern stream, to ensure full protection of the stream, its receiving waters and any associated wildlife. A 5-15m buffer will also be provided as a stand-off to the western and northern hedgerows. Again, these buffers are substantially greater than the 5m buffers adjacent to the southern stream and northern and western hedgerows, as set out in the 'Call for Sites' pro-forma. The width of the hedgerow buffer to be variable (up to 15m or so) to ensure protection of the Root Protection Area (RPA) of the candidate Veteran trees and other mature hedgerow trees.

NOTE. The extent of buffer zone to the small stream would be based on the recommendations of the Project Hydrologist in combination with ecological advice. With regard to mature trees, the buffer provided would accord with advice set out in the above guidance note for Veteran or Ancient trees ie buffer zone to be at least 15 times larger than the diameter of the tree or 5m from the edge of the tree's canopy if that area is larger than 15 times the tree's diameter.

- This buffer would also serve to provide additional stand-off to the nearby Warren Pit LoWS, some 100m to the north of the site. As noted above, this LoWS has been subject to development and now comprises part of a Golf and Country Club and the extraction proposals of Area 58 are not considered likely to adversely affect the remaining ecological interest of the LoWS, due to the intervening road, the existing part developed nature of the LoWS and the integral mitigation proposals set out for Site A58.

- Potential impacts on the Woodham Walter Common SSSI and other SSSIs in the wider vicinity are not expected to pose adverse effects of any significance due to the distances involved and the mitigation measures to be adopted for Site A58.

- Treatment and management of the buffer would be agreed with the MPA and secured under planning condition, to include possible fencing/screening barriers, native woodland edge planting or strategic bund creation, to optimise protection of the adjacent habitats.

- Additional measures to reduce noise / lighting/ dust / aerial pollution, would also be secured through planning condition. This would likely include adopting a sympathetic working regime, including limiting working hours, using wildlife sensitive lighting where necessary, locating dust generating activities such as haul road and soil/mineral stockpiles away from sensitive habitats, (in particular, the woodland and southern stream), best practice pollution prevention and a routine regime of damping down.

- The Project Hydrologist would design in-scheme mitigation measures to ensure that water run-off from the site would be directed away from the southern stream. This strategy would prevent any additional inflow to the stream and specifically would

avoid additional ingress of silt / polluted effluent into the stream. This, combined with the buffering noted above and the distance of water course involved between Site A58 and the European Designated Site, would ensure there is no risk of significant effects to the Blackwater Estuary /Essex Estuaries European designated site, some 8Km downstream of the site.

NOTE. At the application stage a plan-level Habitats Regulations Assessment would be provided to address any potential for effects to the designated site and this would also assess any potential for in-combination effects if both sites A58 and A66 (see above) proceed to the planning application stage.

- As a precautionary measure, the inclusion of a filtration system at the eastern end of the stream, prior to entry to Thrift Wood, could be considered.
- Temporary disturbance / loss of arable habitat that may be used by Priority species of farmland species eg skylarks and brown hare, would be addressed, following appropriate survey in the pre-application stage, through standard measures of ecological mitigation.
- Any other potential impacts on Protected or Priority Species using the adjacent woodland and hedgerow habitats (which may include bats, but which at this stage are not expected to be significant), would also be determined through appropriate survey in the pre-application stage and any such impacts would be addressed through standard measures of ecological mitigation.

In addition to the above high levels of mitigation proposed, it will be necessary to demonstrate that the scheme will comply with or exceed the mandatory Biodiversity Net Gain (BNG) requirements. It is also envisaged that a comprehensive Biodiversity Management Plan and a Habitat Restoration Aftercare Scheme would be provided for Site A58 at the application stage. These will include measures to ensure that appropriate levels of ecological monitoring and remedial action are implemented during the extraction period, including habitat and species monitoring by the Project Ecologist. The Habitat Restoration Aftercare Scheme would aim to ensure that the scheme restoration adopts measures that contribute to site-wide and the wider network of habitat connectivity in this predominantly arable landscape. This would include protection and enhancement of the peripheral hedgerows, stream and the Thrift Wood margins in the long term, post extraction.

It is expected that through the adoption of the above tranche of in-scheme ameliorative measures reducing the intrinsic level of effects on adjacent and nearby habitats, combined with a comprehensive regime of additional mitigation, ecological impacts will be reduced to moderate or minor, requiring only medium or low levels of additional mitigation, This is discussed in more detail below.

#### 4 - SUMMARY AND R-A-G GRADING

The above assessment sets out in-scheme proposals for reducing the overall potential ecological impact of the Site A58 extraction proposals. Despite the proximity of irreplaceable habitat of medium/ high ecological sensitivity, the incorporation of comprehensive buffering as part of the scheme and other substantive mitigation measures (significantly over and above those previously set out in the 'Call for Sites' pro-forma), including measures to optimise working methods, to be secured through planning condition, it is considered that the Red-

Amber grade attributed to Site A58, could legitimately be re-assessed to an Amber grade, as defined as follows:

#### Amber Grade

- Ecological impacts are likely to be moderate and is likely to require medium levels of mitigation to make the Site acceptable.
- This site could have a moderate impact upon international or national designations and is likely to require medium levels of mitigation to make the Site acceptable.
- Subject to plan-level Habitats Regulations Assessment, the adverse effects on the integrity of internationally important wildlife sites could be avoidable with appropriate mitigation.
- The Site could have moderate impacts upon irreplaceable habitats.
- The Site could have a major impact upon the natural environment including local designations and Priority habitats and species.

The premise of the above re-assessment is that the substantive proposed buffering provision forms an intrinsic part of the scheme design. Therefore, the requirement for additional mitigation (in the form, for example, of best practice methods of minimising potential noise, lighting, dust and other physical disturbance, combined with appropriate and specific species mitigation), is significantly reduced to medium or even lower levels (rather than high levels as attributed to the Red-Amber grade) to make the site acceptable in ecological terms. It is also arguable that any ecological impacts of the scheme on international or national designations are likely to be minor and/ or avoidable with appropriate mitigation. Residual adverse impacts on irreplaceable habitats (such as the adjacent ancient woodland) could also legitimately be assessed as minor, given the significantly increased stand-off provision and the restriction of extraction to above water table, minimising any risk of hydrological change.

On this basis it could also be argued that in many respects the ecological assessment could be reduced to an Amber-Green grade, as defined as follows:

#### Amber-Green Grade

- Ecological impacts are likely to be minor and is likely to require low levels of mitigation to make the Site acceptable.
- This site could have a minor impact upon international or national designations and is likely to require low levels of mitigation to make the Site acceptable.
- Subject to plan-level Habitats Regulations Assessment, the adverse effects on the integrity of internationally important wildlife sites are likely to be avoidable.
- The Site could have minor impacts upon irreplaceable habitats.
- The Site could have a moderate impact upon the natural environment including local designations and Priority habitats and species.

This is based on the premise that the potentially major ecological impacts that could be caused by extraction of Site A58 on the adjacent Thrift Wood and other potentially serious impacts on other habitats and species and potentially significant effects on the Blackwater Estuary / Essex Estuaries European site, would be substantially reduced to an acceptable level, through the proposed amendments of the scheme to accord with the measures set out above. In particular, these include the substantial increase in buffer/stand-off provision around all the site margins.

The potential for adverse impacts, including cumulative impacts associated with the existing and extant Royal Oak extraction sites (Phases 1, 2, 3 and 4), to the south of Site A58, would also be minimised through adopting a carefully planned, phased programme of extraction and restoration. This would avoid the risk of simultaneous loss /disturbance of habitats and reduction of habitat networks and would also allow ongoing movement of wildlife around the site and the surrounding area.

## Appendix 3 – Health and Amenity Statement

### 1.0 INTRODUCTION

1.1 This statement has been prepared by Matthews & Son LLP, Chartered Surveyors, in response to the Mineral Site Assessment process conducted in respect of Candidate Site A58, Little Smiths, and specifically in respect of the RED-AMBER Grading for Health and Amenity.

2.1 The aim of this response is to

1. review the current assessment made by in the Consultation documents,
2. consider whether it is accurate and to correct any statements as necessary,
3. consider what can be achieved on site to mitigate any impacts (perceived or otherwise) and
4. propose an altered Grading if appropriate.

### 2.0 CURRENT ASSESSMENT

2.1 The Assessment of Candidate Sand and Gravel Sites (Version 3.0 Final Report, November 2023) sets out a summary of the grading given to Site A58 starting on page 90 (of 288) based on a RED-AMBER-GREEN (or RAG) analysis. The site scores well, being one of only 17 of the 52 sites to have no RED gradings. It does, however, score RED-AMBER for Health and Amenity.

2.2 More detail is provided in Appendix I at page 26 (of 74). It states, 'One sports facility (golf course) is 10m north west. One residential building is 10m north, one residential building is 30m north and one residential building is 210m north east. 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.'

2.3 The logic for the RED-AMBER score is set out on pages 6 and 7 (of 74) of Appendix I. The stated key considerations are, 'It should be noted that distances to sensitive receptors have been measured from the Site boundary and not the extraction area. This is due to limited detail on the extraction area boundary for all sites.'  
'This includes impact of noise, dust, vibration, odour, emissions, bioaerosols, illumination, visual intrusion, traffic, quality of life and community and environment wellbeing. The National Planning Policy Framework (NPPF) and the KMWLP state that the adverse impact of minerals and waste development on neighbouring communities should be minimised.'

‘Consider proximity of sensitive receptors including local communities, residents, hospitals, schools, and commercial and agricultural development whose amenity may be impacted by the development. The ranking is determined by the receptor in closest proximity to the Site.’

It should be noted that the associated Policy Wording (taken from the Adopted Essex Minerals Local Plan 2014) in the first column on pages 6 and 7 makes no specific reference to ‘sensitive receptors’. It is possible to understand reference to ‘residents, hospitals, schools’ in the quoted paragraph above but ‘commercial and agricultural development’ should not, in our opinion, fall into the same category.

2.4 The following constitutes a RED-AMBER Grade:

‘Sensitive receptors including local communities, residents, hospitals, schools, and commercial and agricultural development are less than or equal to 50m but not adjacent (0m) or within the Site boundary.’

‘Therefore, 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.’

### 3.0 ACCURACY OF THE ESSEX COUNTY COUNCIL ASSESSMENT

3.1 Based on measurements using Google Earth the following distances are considered to be representative:

- a) Distance to Site Boundary (as stated by ECC) (m),
- b) Distance to Site Boundary (m),
- c) Distance to Extraction Operations (Call for Sites) (m),
- d) Distance to Extraction Operations (as revised – see Ecology Statement) (m)

	a)	b)	c)	d)
Golf Course (closest point)	10	85	90	Up to 100
Residential Building No1	10	28	33	Up to 43
Residential Building No2	30	39	44	Up to 54
Residential Building No3	210	168	173	Up to 183

### 3.2 Golf Course

Recreational activities are not included at paragraph 2.3 above and the reference to the golf course in the ECC assessment has not been justified.

In any event, it is not 10m from the site boundary, it is approximately 85m and a further 5m to the potential operational area as originally proposed in the Call for Sites. The Ecology Statement produced by Susan Deakin Ecology dated 14 March 2024 also submitted in support of Site A58 Little Smiths proposes a 5m to 15m buffer as a stand-off to the western and northern hedgerows meaning a distance to the golf course from an operational area of between 90m and 100m.

### 3.3 Residential Building No1

It is agreed that a residential building is a sensitive receptor.

It is our opinion that the property is 28m, not 10m, from the site boundary, and a further 5m to the potential operational area as originally proposed in the Call for Sites. The Ecology Statement produced by Susan Deakin Ecology dated 14 March 2024 also submitted in support of Site A58 Little Smiths proposes a 5m to 15m buffer as a stand-off to the western and northern hedgerows meaning a distance to the property from an operational area of between 33m and 43m. The proposer would agree to extending the stand-off in this area to a minimum of 50m without further mitigation.

### 3.4 Residential Building No2

It is agreed that a residential building is a sensitive receptor.

It is our opinion that the property is 39m, not 30m, from the site boundary, and a further 5m to the potential operational area as originally proposed in the Call for Sites. The Ecology Statement produced by Susan Deakin Ecology dated 14 March 2024 also submitted in support of Site A58 Little Smiths proposes a 5m to 15m buffer as a stand-off to the western and northern hedgerows meaning a distance to the property from an operational area of between 44m and 54m. The proposer would agree to extending the stand-off in this area to a minimum of 50m without further mitigation.

### 3.5 Residential Building No3

It is agreed that a residential building is a sensitive receptor.

It is our opinion that the property is 168m, not 210m, from the site boundary, and a further 5m to the potential operational area as originally proposed in the Call for Sites. The Ecology Statement produced by Susan Deakin Ecology dated 14 March 2024 also submitted in support of Site A58 Little Smiths proposes a 5m to 15m buffer as a stand-off to the western and northern hedgerows meaning a distance to the property from an operational area of between 173m and 183m.

## 4.0 MITIGATION

It is important to recognise that there are very few sensitive receptors at this location; there are three (the residential properties) that should be considered when assessing how to categorise Site A58 Little Smiths in respect of Health and Amenity.

An additional source of mitigation would be screening bunds. These could be sited behind the hedgerows and would primarily afford noise attenuation but also, in conjunction with the foliage, they could contribute to visual screening.

It is important to recognise that the mineral extraction and restoration operations are transitional, and they would therefore be in the vicinity of these sensitive receptors for only a short duration and certainly not throughout the life of operations.

## 5.0 PROPOSED ASSESSEMENT

Site A58 Little Smiths has been classified as RED-AMBER on the basis of its proximity to sensitive receptors, two of which are less than 50m from the site boundary. Introducing larger stand-offs to a minimum of 50m would have the effect of revising the classification to AMBER which is defined as,

‘Sensitive receptors including local communities, residents, hospitals, schools, and commercial and agricultural development are more than 50m but less than or equal to 250m from the Site boundary.’

‘Therefore, the Site is likely to have a moderate impact on health and amenity and is likely to require medium levels of mitigation to make the Site acceptable.’

We propose that the Health and Amenity component of the site assessment be amended to AMBER accordingly.