

Response to Minerals Review – A91 Land at Chignal Saint James

I am pleased to have this opportunity to comment on the proposed site A91 Land at Chignal Saint James. I believe there are a great deal of factors that you may not be aware of that will justify the removal of this site from further consideration.

I am unsure of how these comments will be read, divided individually between the relevant “experts”, or reviewed by one individual. To try and cover each eventuality I have taken each of the RAG assessments in turn and commented on each, stating the reasons for my views. This has led to some duplication of the information as a certain point may be relevant to more than one assessment criteria. Please pass the information to the relevant person if I have included it in the wrong assessment.

The main area of concern is the lack of focus on the access from the old Roxwell Quarry site to the proposed excavation site and that the old Roxwell Quarry processing site was dismantled several years ago and its restoration as a Priority Habitat is well underway.

Relevant Planning Applications for reference:
(in the text body referred to as My Planning Reference “MPR xx”)

MPR 1.

01/02302 (Refused) Decision notice – The site does not have satisfactory linkages with the road hierarchy, would result in increased commercial traffic along country lanes and would thereby not have suitable road access” (site at Chignal Hall Farm).

MPR 2.

03/00975/FUL Decision notice – Barn to be used only for storage because “The use of the building for distribution purposes would generate unacceptable levels of traffic and activity that would be detrimental to amenity and highway safety.” (site at Chignal Hall farm).

MPR 3.

14/01659/FUL Decision notice

“Condition 1 - The track shall only be used for purposes related to agriculture and for access by Essex Scouts and Essex Young Farmers whilst they use land and buildings located at Chignal Hall Farm for storage purposes.

Reason

The unrestricted use of the access track would be detrimental to the intrinsic character and beauty of the countryside and the amenities of the occupiers of nearby residential properties.”

Relates to the track that runs north from the old Roxwell Quarry site to Chignal Hall Farm.

MPR 4.

Wildlife and Countryside Act 1981

Countryside and Rights of Way (CRoW) Act 2000

Schedule 2 of the Conservation of Habitats & Species Regulations 2010

Which when taken together makes it illegal, inter alia, to:

Intentionally or recklessly kill, injure or capture a great crested newt (GCN)

Damage or destroy habitat that a GCN uses for shelter or protection

Deliberately disturb a GCN when it is occupying a place it uses for shelter and protection

(Information from 5.7.3 of the Ecological Management Delivery Plan under condition 23 of ESS/70/17/CHL and associated section 106)

MPR 5

All under MPR 5 relate to previous applications for gravel extraction at the proposed site and the restoration of the former extraction sites and processing at the old Roxwell Quarry Processing Site (all extraction and processing permissions have now expired).

MPR 5a

ESS/27/08/CHL REFUSED – The original Application for “Construction and use of an irrigation reservoir on land at

Chignal Hall Farm, with the extraction of underlying sand and gravel at Chignal Hall Farm, Mashbury Road, Chelmsford”

MPR 5b.

CHIGNAL HALL FARM IRRIGATION RESERVOIR, CHIGNAL ST. JAMES, ESSEX CONSTRUCTION WORK AND MINERALS EXTRACTION ASSESSMENT OF NOISE; 9.1 Recommendations – dated 22 May 2008; Dean E. Barke. MSc. MIOA; Project No: 067107
(noise assessment submitted with ESS/27/08/CHL REFUSED)

MPR 5c.

ESS/05/15/CHL - Restoration Scheme

Appendix N – Noise Assessments for Brittons Hall Farm Landfill Site and Area Z and the former Plant Site

Condition 3 – Restoration of the former Roxwell Quarry Plant Processing Site to be completed by 31 December 2019

To protect/safeguard public amenity the following conditions were included:

Condition 4 and 6 relate to vehicle movements

Condition 5 relates to working hours

Condition 8 imposed stringent noise monitoring and noise levels

Condition 9 and 10 limits “special operations” such as soil stripping

Condition 13 requires vehicles to be fitted with silencers

noise (stringent monitoring and levels – condition 8), working hours (condition 5), limits on “special operations” such as soil stripping (condition 9 and 10), vehicles to be fitted with effective silencers (condition 13)..... All put in place to protect/safeguard public amenity.

MPR 5d.

ESS/70/17/CHL - Updated Restoration Scheme

Condition 19 – Agricultural aftercare scheme

Condition 23 – Ecological Management Delivery Plan

Condition 27 – Landscape and Habitat Creation Scheme for Area Z and Plant Site

MPR 5e

Condition 23 of ESS/70/17/CHL and associated section 106

5.4.1 – Woodland areas are complemented by a network of new and restored hedgerows all of which will qualify as Priority Habitats

Section 6 - relates to the restoration of area Z.

6.2.2 - The area is expected to be home to great crested newts as they tend to be within 50m of ponds. 6.5.1 - Clearly states that should any control of scrub or any groundworks be required on the grassland/scrub verge adjacent to the access track, advice must be sought from a suitably qualified ecologist to ensure that working methods will not result in any adverse impacts on this species.

6.4.3 and 6.4.4 list priority species known to be in the Chignals (brown long eared bat, barbastelle bat, cuckoo, song thrush, tree pipit, hedgehog, common toad, great crested newt, grass snake, numerous priority species of moth).

Section 7 - Relates to the restoration of the Old Roxwell processing site

7.1.1 - States the discovery of a medium population of Great Crested Newts and that the restoration plan should focus on their protection and the habitat enhanced with nature conservation rather than agriculture as the focus to create a “Priority Habitat”.

7.2.1 - The former Roxwell site is being restored to “Priority Habitat type ‘open mosaic on previously developed land’

7.2.2 - The site has potential for other priority species to colonise the site (grass snakes and lizards). 7.4 - Details constraints that should be adhered to as there is the presence of a protected species (no excavations of any description without prior consent of the named ecologist on the mitigation licence).

RAG Assessment

Appendix	Descriptor	Your Assessment	My Assessment
B	Landscape and Visual Sensitivity	Amber/Green	Red/Amber
C	Biodiversity	Amber/Green	Red
D	Historic Buildings	Amber/Green	Amber
E	Archaeology	Amber	Amber
F	Flooding	Amber	Red
G	Transport	Green	Red
H	Access	Amber	Red
I 1	PRoW	Red/Amber	Red/Amber
I 2	Geoenvironmental	Green	Green
I 3	Hydrology, Hydrogeology and Drainage	Amber	Red/Amber
I 4	Air Quality	Green	Red/Amber
I 5	Soil	Amber	Red/Amber
I 6	Services and Utilities	Red	Red
I 7	Health and Amenity	Amber	Red
I 8	Green Belt	Green	Green
I 9	Airport Safeguarding Zones	Green	Green

Impact Assessments

Assessment B – Landscape and Visual Sensitivity

You assessed as Amber/Green I suggest Red/Amber

Although the proposed excavation site is more closely accessed from Mashbury Road this is highly unlikely. Past planning applications have indicated that Mashbury Road cannot support increase HGV movements MPR 1 and 2.

The alternative, as per your assessment, is to access the site from the A1060, using the tarmac haul road to the weighbridge above the old Roxwell Quarry processing plant.

This route would also be necessary so that any material leaving the site (or inert waste entering the site for land tax purposes) can be measured using the weighbridge.

If this is the case, then one must assume that access is required from the old Roxwell Quarry processing plant to the new excavation site.

The restoration of the proposed excavation site would involve the importation of inert waste by HGV!

The plans for the proposed access road show an existing track but this has rarely been used during the 30 years [REDACTED] and will need upgrading to handle HGVs. The proposed route of the track going east-west [REDACTED] and closer to Chignal Hall than the track mentioned in MPR 3, and it would have significantly higher usage. The section where the track would cross the River Can and go north to Mashbury Road would impact Chignal Hall, 4 residential barn properties at Stevens Barns, Stevens Farm and numbers 1 and 2 Chignal Hall Lane. If upgraded and used the track will be as mentioned in MPR 3 would be “detrimental to the intrinsic character and beauty of the countryside and the amenities of the occupiers of nearby residential properties”.

The existing track will need substantial upgrading to accommodate the large excavators and HGVs that will need to access the site each day. MPR 5a indicated that vehicle movements would be in the region of 246 of HGV size – this did not account for dump truck movements which I assume would be needed for the importation of inert materials as indicated on the current proposal (if half of the excavated land is filled with inert waste that would be importing 340,000 tonnes). The HGVs will themselves impact the visual amenity.

Site of the old Roxwell Quarry Processing Plant

The Old Roxwell Quarry processing plant has been dismantled and removed from the site which now has significant value to wildlife which I will address in due course.

The first portion of the proposed access road (about half a mile total length) runs adjacent and, for approximately 175m, along footpath 38 which is widely used. The access road will also bisect footpath 35.

The access road from the processing plant to the excavation site will cut through an existing wildlife corridor that is regularly used by wildlife - deer, [REDACTED] otters, hares, foxes and home to great crested newts barn owls, tawny owls, kestrels, buzzards, herons, skylarks and lapwings. I am unsure about the movement of bats, but they are often seen in the village, and I assume they use river corridors as much as other animals (Ecological Management Delivery Plan as part of MPR 5e).

Conveyor Belt

The conveyor belt will run alongside the new access road. This will cause further intrusion visually and acoustically, affecting wildlife and enjoyment of the footpath and nearby properties of Moat House, Chignal Hall, Stevens Farm and the associated four barn conversions and number 1 & 2 Chignal Hall Lane. From previous experience of the old Roxwell Quarry I know that once in use the rollers that carry the belt start to squeak and need replacing or oiling, but this takes time and manpower. The noise is noticeable and intrusive, especially when you consider the quietness of Chignal Saint James.

The conveyor belt will require at least one change of direction and so a minimum of 2 motors will be needed to drive the belt from the excavation site to the processing plant. These motors and the hoppers used to “catch” the gravel as it transfers from one direction to the other are noisy and will need screening – creating a barrier in the region of 3m high to be effective - this sound baffle will be visually intrusive. The expected noise level from the conveyor was expected to be in the region of 75dB at 10m and solid acoustic screening would extend at least 1m above the drive units (MPR 5b)

To put this into context the sound 10m from the conveyor belt would be like standing next to a vacuum cleaner.

MPR 5e details the restoration of Area Z (the land adjacent to the access road running from the plant to the proposed excavation site in an east – west direction) and the former Roxwell Quarry Plant Processing Site.

Section 6 relates to the restoration of area Z. MPR 5e 6.2.2 states that the area is expected to be home to great crested newts as they tend to be within 50m of ponds. If this were the case it is equally likely that a good proportion of great crested newts will also cross the track (which is infrequently used by vehicles at present). The use of the track for access to the proposed excavation site would be in contravention of all the planning effort to protect this species. MPR 5e 6.5.1 states the measures to be taken if control of scrub adjacent to the track is needed. This is the proposed access route and position for the conveyor between the old processing plant at Roxwell Quarry and the proposed excavation site. Restoration planting will link up blocks of woodland, MPR 5e 6.4.3 and 6.4.4 list priority species known to be in the Chignals that will benefit (brown long eared bat, barbastelle bat, cuckoo, song thrush, tree pipit, hedgehog, common toad, great crested newt, grass snake, numerous priority species of moth). Personally, I am filled with joy when the kingfisher visits my pond (even though it eats my fish!).

MPR 5e section 7 relates directly to the restoration of the old Roxwell Quarry processing site beginning with stating (MPR 5e 7.1.1) the discovery of a medium population of Great Crested Newts and a focus to create a “Priority Habitat”. 7.2.2 continues to add that the site has potential for other priority species to colonise the site (grass snakes and lizards). 7.4 details the stringent constraints that should be adhered to on the site.

I am concerned that the BMV land will be lost to agriculture. Other fields that were excavated and subsequently restored are not always used for agriculture. The field between the proposed access road and the Barns at Stevens Farm appear to have a test site for Solar Panels. I am concerned that restoration (not included in this assessment) will not be completed to the level indicated – We are still awaiting the final completion of the restoration of the former Roxwell Quarry site. The outlook of the listed buildings and the expectation to see farmland is in danger of being lost and the open rolling landscape that is characteristic of Essex will not be present. I have no confidence that the BMV land will be returned to agricultural use.

The footpath Chignal 11 and bridleway Chignal 12 enjoy an elevated position overlooking the proposed site. I often walk along this route and enjoy uninterrupted views across the fields to the houses at the Saracens development, I can easily see the water level in the recently constructed reservoir. Horse riders enjoy a more elevated position and would be able to see across the heart of the Chignal villages. I am also acutely aware of the large numbers of people from Newlands Spring, Little Hollows and Saxon Gate who use the footpaths, especially since the pandemic. The footpaths start at the edge of the estate and within minutes you have left the town and are in tranquil countryside (footpaths that form circular routes to Newlands Spring are Chignal 26, 27, 30, 23 short route, Chignal 26, 22, 19, 30, 23 medium route, and 26, 22, 16, 12, 11, 38, 27 longer route). The routes are not limited, I enjoy walking along footpaths to Writtle, the Easters, Pleshey and Gt Waltham. Many of these routes enjoy the open and far-reaching views that the landscape provides, walkers and horse riders will lose this amenity if shielding bunds are erected around the excavation site.

The Mashbury Road is a main artery to the countryside for cyclists leaving and returning to Chelmsford. I have looked at Strava (25/03/2024) and using “local legend” segment data was able to determine that in the last 90 days 473 cyclists had left Chelmsford along the Mashbury Road and 619 cyclists had returned to Chelmsford. I would assume that most did not go out and return the same way as a short route would be to go around both villages (5 miles) and longer routes (20 miles and above) allow for different routes back into Chelmsford. I was also able to see that at the proposed crossing point to the proposed excavation site (heading downhill towards Chelmsford) a slower rider might easily be travelling at 15mph while faster riders would be travelling in excess of 30mph. Of course, you will appreciate that these numbers only account for cyclists that log their activity on Strava, and I can only look at data for the last 90 days which is the depth of winter. In the summer the activity is much higher with charity rides often using the road with hundreds of people. Ride London passes very close with over 20,000 riders – As you go down the hill on Breeds Road towards the Pig and Whistle Google Street View gives you an uninterrupted view across the gently rolling fields, I wonder if the excavation site would be visible from this elevated position? (not a good advert of Essex countryside to 20,000 riders), the new reservoir is certainly visible.

As you travel along Mashbury Road the gentle undulations put you in a position where you enjoy views right across the proposed site, often seeing herds of fallow deer as they use the area to traverse across the countryside.

The lanes, footpaths and bridleways are also used by many runners, Chelmsford Athletics club hold their annual 10K run

around the villages of Chignal Smealy and Chignal Saint James. Many DofE routes also pass through the village, using the footpaths and are often navigating towards or away from Screens Park

At present there is no crossing at Mashbury Road to the proposed excavation site. Where the track emerges is a small farm gate overgrown on all sides and with a small, wooded area to one side and established hedging on the other side. The proposed crossing point is in a dip in the road (just before a bend) that regularly floods. The existing culvert is too small (approx. 12 inches diameter) to take a conveyor through meaning the road will need to be dug up and a new culvert put in place.

If acceptable visibility splays are possible at this location it will require substantial cutting back and removal of mature trees and hedgerows, the road will need digging up and a new culvert built to accommodate the conveyor. The drainage will need to be altered so that the conveyor belt and associated motors are not submerged when it rains – altering the watercourse that feeds into the river Can. This would contravene MPR 5d 5.4.1, the existing trees and hedges making up a nature corridor of Priority Habitat.

I am unsure of how the landscape is graded but the area of the proposed excavation site is typical of Essex countryside, open with far reaching views over rolling/undulating landscape, I cannot think of any features that would make it more attractive. I cannot envisage how it would possibly look more attractive after restoration and as mentioned, fear for what will be left in its place.

Appendix C – Biodiversity

You assessed as Amber/Green I suggest Red

I have commented as best as possible by relating to all the paragraphs you have in your assessment.

Para 1 - Roxwell Quarry complex restoration should have been completed by December 2019.

Para 3 - I believe the site should be graded Red.

The impact on priority species will be high (Great Crested Newts plus others listed previously). The access road will need to be used by HGVs and site machinery (the Mashbury Road network will not support increased HGV movements, MPR 1 and 2). These vehicle movements along the access track will destroy habitat as at present even scrub cutting at the edges of the access track has limitations imposed.

Para 4 – This assessment does not account for the need to upgrade the track to take HGVs heavy plant machinery or the need to remove trees and hedgerows to create visibility splays at the road crossing. This assessment does not include the need for a new larger culvert to be constructed beneath Mashbury Road and alterations required to prevent the conveyor from being flooded.

Para 5 – The access track will be used for HGVs and excavation machinery, as already mentioned MPR 5a estimates the number of HGVs at 246. Importation of inert waste would be additional HGV movements to this.

The access road and conveyor belt run alongside Area Z for approximately 450m. As mentioned previously this habitat has been restored (suitable for grazing) and in particular restoration has been sympathetic to Great Crested Newt habitat (MPR 5e).

The access road and conveyor belt will impact this site, MPR 5e 6.5.1 and 7.4 - ecological expert advice must be sought before even cutting the verges of the track.

Para 6 – The former Roxwell site is currently under restoration to “Priority Habitat type ‘open mosaic on previously developed land’ MPR 5d condition 23 – not arable grassland as you suggest.

Para 7 – The existing culvert under Mashbury Road is too small to accommodate a conveyor, the road would need to be dug up and a new, larger culvert installed. The area floods, to prevent submersion of the conveyor equipment alteration to water course levels will be required, destroying Priority Habitat MPR 5e 5.4.1

The existing track from the old Roxwell Quarry site to the new excavation site must have HGV and heavy excavation vehicle movements. The existing road network to the site will not support increased HGV movements (MPR 1 and 2), as a minimum the application mentions the importation of inert material as part of restoration. These vehicle movements and improvement needed to the track will be in contravention of MPR 4.

If no processing was to take place at the old Roxwell Quarry site a very large number of vehicle movements would be made to ship the material to another processing site increasing noise at Moat House and Chignal Hall (and quite likely Stevens Farm and Barns). This would place a strain on the A1060 where a large residential estate is likely to be built at Warren Farm.

Para 8 – By existing haul road, I assume you refer to the tarmac road that runs from the A1060 to the weighbridge that is above the old Roxwell Quarry processing site – not the access track from the old Roxwell Quarry processing site to the proposed excavation site.

Para 9 – You state in your assessment that grading is Amber/Green because ecological impacts could be minor and low levels of mitigation could make the site acceptable. I believe I have shown that the impact, especially along the access from the old Roxwell Quarry to the new excavation site is severe.

I have demonstrated that HGV movements will have to be along the access track. Even after improvements have been made to the track to accommodate HGVs (contravenes MPR 3) significant dust will be generated. This dust from HGV movements will coat the leaves of vegetation smothering them (also applicable to Para 11 below).

The large number of HGV movements and continuous rumble of the conveyor will scare wildlife and prevent them using the river as a wildlife corridor.

The need to create an access across Mashbury Road will destroy valuable hedgerows and trees (contravenes MPR 5e 5.4.1).

Para 10 – The construction of bunds to act as a buffer along the access track that runs approximately 350m east-west from the old Roxwell Quarry processing site will be impossible as 175m would be on the public footpath and the rest would be disturbing the habitat of great crested newts (MPR 4, 5e section 7)

Para 11 – The sky is dark in Chignal Saint James and any light (even wildlife sensitive lighting) would be visually intrusive and take away amenity. I cannot give any quantitative data but there are no streetlights in the village and as a result the night sky is dark. As a school assessment for his GCSE Astronomy was able to photograph the stars and generate star trails to work out the length of one day. I enjoy observing the stars.

Para 12 – All plant was removed from the old Roxwell Quarry site several years ago. The site is being restored, as previously mentioned, there is a medium sized population of great crested newts at the old Roxwell Quarry processing site and the restoration is sympathetic to the long-term viability of this protected species.

Appendix D – Historic Buildings

You assessed as Amber/Green I suggest Amber

Again, the access track and conveyor from the old Roxwell Quarry site to the new excavation site have not or appear not to have been considered. The track would be in clear view of Chignal Hall from many of the east and south elevations. Should the track be tarmac or concrete in construction then the impact would be great. If the track were upgraded using type 1 or road plainings then dust would be an issue (MPR 3 is also relevant).

Appendix E – Archaeology

You assessed as Amber I agree

Reading your assessment, it would appear that one field was excavated, and potentially vital historical information lost with only “rescue excavations” undertaken. A priority must be to preserve this site until proper excavations are completed on the Roman Villa and what is left of the untouched surrounding area.

Appendix F – Flooding

You assessed as Amber I suggest Red

I have graded this as Red as I do not believe the mitigation measures detailed in your assessment are possible. I would also ask you to assess the impact of a new culvert under the Mashbury Road at a point that frequently floods.

The existing culvert (approx. 30cm diameter) under Mashbury Road is too small to accommodate a conveyor belt and that stretch of road regularly floods. A new larger culvert would be required, and I assume alterations to water courses would be required to prevent the conveyor and associated electric motors from being submerged.

Thank you for acknowledging that the track, that has hardly been used for 30 years [REDACTED] would need upgrading (you mention raising the track, but this would go against MPR 3). The track does flood and in winter will often have stretches that are up to a foot underwater (about 175m or so is also footpath 38). Also, my understanding is that because of the presence of the great crested newts, raising the track would be in contravention of MPR 4 and from an amenity aspect MPR 3.

As mentioned previously there are stringent conditions in place to protect the great crested newts and MPR 5 (detailing some of the planning documents for the old Roxwell gravel workings) gives the reasons why this should not be upgraded from an ecological perspective (especially MPR 5e).

Appendix G and H – Transport and Access

You assessed as Green (Transport) and Amber (Access) I suggest both are Red

The quickest / shortest route by road to the excavation site is via the Mashbury Road. However, numerous planning applications have been refused as the road network will not support any increase in HGV movements (MPR 1 and 2).

The alternative, as per your assessment, is to access the site from the A1060 as was used by the old Roxwell Quarry and then use the tarmac haul road to the weighbridge above the old Roxwell Quarry processing plant.

This route would also be necessary so that any material leaving the site (or inert waste entering the site for land tax purposes) can be measured using the weighbridge.

The above would then lead me to assume that access is required from the old Roxwell Quarry processing plant to the new excavation site.

The restoration of the proposed site would involve the importation of inert waste by HGV – at half the tonnage of removed gravel that would be 340,000 tonnes of imported material!

The plans for the access road show an existing track but this has rarely been used during the 30 years [REDACTED] in the village and will need upgrading to handle HGVs. The proposed route of the track going east-west puts it at a similar distance [REDACTED] and closer to Chignal Hall than the track mentioned in MPR 3, and it would have significantly higher usage. The section where the track would cross the River Can and go north to Mashbury Road would impact Chignal Hall, the dwellings at Stevens Farm and at numbers 1 and 2 Chignal Hall Lane. If upgraded and used the track will be as mentioned in MPR 3 “detrimental to the intrinsic character and beauty of the countryside and the amenities of the occupiers of nearby residential properties”.

The east-west section of the access track sits between the River Can and Area Z, I have explained previously that the area either side of the track is protected because of the presence of great crested newts (and that even before cutting verges the advice of an ecologist should be taken MPR 5e 6.5.1).

At present there is no crossing at the Mashbury Road to the proposed excavation site. Where the track emerges is a small farm gate overgrown on all sides and with a small, wooded area to one side and established hedging on the other side. The proposed crossing point is at a dip in the road that regularly floods. The existing culvert is too small to take a conveyor through meaning the road will need to be dug up and a new culvert put in place.

The speed limit on the Mashbury road is 60mph. As you approach the proposed crossing point from Chelmsford the road goes over a rise less than 215m from the crossing point. As you approach the crossing point from the other direction there is a slight bend in the road which also reduces the visibility from the crossing point to less than 215m. This would mean that potentially neither side of the proposed crossing point will have sight lines that are acceptable (your assessment details sightlines of 215m for 60mph speed limit). If sight lines were able to be made acceptable it would involve the removal (destruction) of trees, shrubs and hedgerows that link up blocks of woodland (contravenes MPR 5e 5.4.1).

I would like to add that many cyclists use the road and when approaching the proposed crossing from the north will enjoy a gradual downhill section where faster riders will reach speeds in excess of 30mph, and most other cyclists will reach speeds above 15mph (data from Strava).

I would also like to highlight the stringent conditions that were put in place for the restoration of the previous site: MPR 5d details the restoration of Area Z (the land adjacent to the access road running from the plant to the proposed excavation site in an east – west direction) and the former Roxwell Quarry Plant Processing Site. MPR 5c highlights several of the stringent conditions relating to vehicles that were in effect for the old Roxwell site plant/machinery to protect and safeguard public amenity.

MPR 5e section 6 relates to the restoration of area Z and the great Crested Newt colony, it is equally likely that a good

proportion of great crested newts will also cross the track (which is infrequently used by vehicles at present). This use of the track for access would be in contravention of all the planning effort to protect this species (MPR 5e 6.5.1). This is the proposed access route and position for the conveyor between the old processing plant at Roxwell Quarry and the proposed excavation site.

Appendix I

Public Rights of Way (PRoW)

You assessed as Red/Amber I agree

Although I agree with the assessment I would wish that the additional information included here is used to strengthen this outcome.

The first part of the proposed access road from the Roxwell Quarry to the proposed excavation site runs adjacent and, for approximately 175m, along footpath 38 which is widely used. The access road will also bisect footpath 35.

The existing track will need substantial upgrading to accommodate the large excavators and HGVs that will need to access the site each day. MPR 5a indicated that total vehicle movements would be in the region of 246 of HGV size – this did not account for dump truck movements which I assume would be needed for the importation of several hundred thousand tonnes of inert materials as indicated on the current proposal.

The footpath Chignal 11 and bridleway Chignal 12 enjoy an elevated position overlooking the proposed site. I often walk along this route and enjoy uninterrupted views across the fields to the houses at the Saracens development I can easily see the water level in the recently constructed reservoir. Horse riders enjoy a more elevated position and would be able to see across the heart of the Chignal villages. I am also acutely aware of the large numbers of people from Newlands Spring, Little Hollows and Saxon Gate who use the footpaths, especially since the pandemic. The footpaths start at the edge of the estates and within minutes you have left the town and are in tranquil countryside (footpaths that form circular routes to Newlands Spring are Chignal 26, 27, 30, 23 short route, Chignal 26, 22, 19, 30, 23 medium route, and 26, 22, 16, 12, 11, 38, 27 longer route). The routes are not limited, I enjoy walking along footpaths to Writtle, the Easters, Pleshey and Gt Waltham. Many of these routes enjoy the open and far-reaching views that the landscape provides, walkers and horse riders will lose this amenity if shielding bunds are erected around the excavation site.

Geo-Environmental

You assessed as Green

No Comment

Hydrology, Hydrogeology, and Drainage

You assessed as Amber I suggest Red/Amber

I am unclear from your assessment if you are aware of the following:

To reach the proposed excavation site from the old Roxwell Quarry an access road will run adjacent to the River Can (east-west) for approximately 350m (a flood plain for the River Can). before crossing the river and running north/south along the full length of the water course that links the extraction site to the river Can. A conveyor belt will be constructed alongside the access road to carry minerals.

The access road will require upgrading to carry the HGVs that will access the excavation site.

A new culvert will need to be built under the Mashbury road as the existing culvert is too small for a conveyor belt. The area around the culvert regularly floods and so alterations will be required to the existing water course to prevent this happening and flooding the conveyor belt and drive motors.

If the access track is raised in height it will be in contravention of MPR 4 and 5e.

Air quality

You assessed as Green I suggest Red/Amber

There is an air quality monitoring site approximately 200m from the proposed excavation site. The equipment is located in the community orchard. The orchard volunteers work to strict guidelines as to what and when they can carry out certain gardening tasks.

I believe the dust and general disturbance from the gravel extraction workings would have a far greater impact on the monitoring station than anything that the volunteers could possibly do (there are restrictions imposed regarding height of

trees, planting distance etc. to reduce interference at the monitoring equipment). I would ask that the assessment is carried out again – details of the site at Chignal Saint James can be found here: <https://essexair.org.uk/map> alternatively the site gives the coordinates 566463, 210830.

Soil Quality

You assessed as Amber I suggest Red/Amber

I am concerned that the BMV land will be lost to agriculture. Other fields that were excavated and subsequently returned to agriculture (on the other side of the road to the proposed site) were high yielding fields but are now left fallow or used for low value crops such as hay, I assume because of the poor quality of the soil that remains. I have no confidence that the BMV land will be returned to agricultural use. We should be protecting this valuable resource for food production.

Services and Utilities

You assessed as Red I agree

I agree with the assessment for the reasons given. However, I would also like to highlight that there is a strong possibility that the National Grid network (400,000V) will cross or go very close to the proposed site as part of the Norwich to Tilbury upgrade.

Health and Amenity

You assessed as Amber I suggest Red

I have difficulty following this assessment as I am unsure what properties/amenities are being described. I do not think the evaluation has considered/taken into account the access route from the old Roxwell Processing Site (where the tarmac haul road ends) and the excavation site.

Number 1 Chignal Hall Lane is across the Mashbury Road from the site, if they are sat in their garden they can be as close as the road width or at the nearest part of their house (10m and 50m respectively). Number 2 Chignal Hall Lane is also very close. I assume amenity includes being able to use a properties outside space. Amongst other discrepancies, the playing field is northwest of the site (not northeast as stated in the evaluation).

When describing the site access, I think you are describing the access onto A1060. The evaluation does not take into account the access to the excavation site and that it will cross the Mashbury Road.

When considering amenity I believe it is essential to include the access track and conveyor belt, both of which will run from the old Roxwell Quarry processing plant east-west for about 450m before crossing the River Can and following the water course along its length, about 350m, up to the Mashbury Road where a new crossing point (at 51°45'59.7"N 0°24'47.2"E) will need to be constructed to allow HGVs and excavators to enter the proposed excavation site. As the existing culvert (approx. 30cm diameter) is too small to accommodate the conveyor a new culvert will need to be constructed under the road at this point too.

Due to the exceptional quietness experienced in the locality (MPR 5b and 5c Appendix N) the noise and visual impact of the access road and conveyor will be significant (on the properties at Stevens Farm (the farm and four barn conversions), Chignal Hall, Moat House and number 1 and 2 Chignal Hall Lane (who will be sited opposite to the track and conveyor belt and adjacent to the excavation)). The access from the old Roxwell Quarry to the proposed excavation site will be along this track as the Mashbury Road will not support any increase in HGV movements (MPR 1 and 2). If upgraded and used the track will be, as mentioned in MPR 3 “detrimental to the intrinsic character and beauty of the countryside and the amenities of the occupiers of nearby residential properties”.

The access road and conveyor belt will cause visual and acoustic intrusion, and if the processing site is reinstated (all processing plant and machinery has been removed and the site is currently under restoration MPR 5) vehicle movements and reversing “beeps” will all affect the ability to use our outside spaces. From previous experience of the quarry that was at the Roxwell site I know that once in use the rollers that carry the belt start to squeak and need replacing or oiling, but this takes time and manpower. The noise is noticeable, especially when you consider the quietness of Chignal Saint James (MPR 5b, 5c Appendix N)

The conveyor belt will require at least one change of direction and so a minimum of 2 motors will be needed to drive the belt from the excavation site to the processing plant. These motors and the hoppers used to “catch” the gravel as it transfers from one direction to the other are noisy and will need screening – creating a barrier in the region of 3m high to be effective - this sound baffle is itself visually intrusive. The expected noise level from the conveyor was expected to be in the region of 75dB at 10m and solid acoustic screening would extend at least 1m above the drive units (MPR 5b).

To put this into context the sound 10m from the conveyor belt would be like standing next to a vacuum cleaner (various noise website comparison tables).

Nowhere in the assessment is mention made of how extremely quiet the location is and how the noise of the excavation and associated processing plant will affect residents amenity. The noise survey conducted for the 2008 application (MPR 5b) notes that during the daytime sound levels at the properties most likely to be affected are typically in the region of 35dB (point 3.6 and 3.10) and nighttime levels drop to the low 20's dB (point 3.11). This means that the site in normal operation will be significantly louder than the present background noise levels, particularly noticeable at night if water pumping operations must be carried out.

I would like to highlight that the decibel scale is logarithmic so an increase of 3dB doubles sound intensity; 10dB is a x10 increase; 20dB is a x100 increase; 30dB x1000 increase and so on. Typical comparisons are: 15dB is recognised as able to hear a pin drop at 1m, 20dB – 30dB is rustling leaves and whisper and 40 dB would be a quiet room, all of these sound levels are referred to as faint.

I believe it is also worthy of note that the noise survey often acknowledges that the processing plant at the Roxwell site contributed to the noise levels that were monitored indicating that were a survey to be conducted now the noise levels would likely be significantly lower.

MPR 5d details the restoration of Area Z (the land adjacent to the access road running from the plant to the proposed excavation site in an east – west direction) and the former Roxwell Quarry Plant Processing Site. The document details many other conditions relating to vehicle movements (MPR 5c) all put in place to protect/safeguard public amenity.

MPR5c Appendix N - I believe that these measures were difficult to implement and trying to adhere to a limit of background noise plus 10dB (a recognised limit) was thought to be almost impossible to achieve in the restoration document. A daytime noise limit of 45dB and a nighttime limit of 30-35dB for overnight pumping of water would be the aim for a new development (background plus 10dB).

The Chignals have no street lighting and the sky is very dark for somewhere so close to London. Any light (even wildlife sensitive lighting) would be visually intrusive and take away [redacted] amenity. I cannot give any quantitative data but there are no streetlights in the village and as a result the night sky is dark. As a school assessment for his GCSE Astronomy [redacted] was able to photograph the stars and generate star trails to work out the length of one day. I enjoy observing the stars.

Green Belt

You assessed as Green

No Comment

Airport Safeguarding Zones

You assessed as Green

No Comment

Conclusion

I would ask that the information in this document be used in conjunction with your own to re-evaluate the feasibility and RAG assessment of site A91 Land at Chignal Saint James.

Clearly there is a wealth of information on the proposed site - A91 Land at Chignal Saint James and the surrounding area that contradicts much of the RAG assessment findings. There is so much information available that is pertinent to site A91 that it is impossible for me to include everything that is relevant in my comments (2008 noise report 43 pages, subsequent noise report for restoration application, EMDP 29 pages – at least 10 reports to support the 2008 application and the relevant planning responses). I trust that now I have highlighted relevant planning information you will access it yourselves and include other relevant information that I have missed.

I would ask that the RAG assessment is revisited and re-evaluated to give a true assessment of this site. Once your re-evaluation has been completed I would hope that you agree with me and remove A91 Land at Chignal Saint James from your considerations.