

Land at Heckfordbridge

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

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 A61: Heckfordbridge Site 1 and A62: Heckfordbridge Site 2, together with supplementary information to allow a correct assessment of the site(s) status to be made - for promotion within the Replacement Essex Minerals Local Plan 2025 - 2040 (MLP).

As the MPA graded A61 the same as A62, a focus has been made on Candidate Site A62: Heckfordbridge (Full Site) as that provides for the most mineral at 8.2 million tonnes (Mt).

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SHEET No.



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|---|--|
| Heckfordbridge Promotion Area | Proposed Temporary Screening Bunds |
| Existing Trees, Hedgerows & Woodland | Advanced Permanent Native Tree & Shrub Planting |
| Surrounding Roads, Tracks & Buildings | Advanced Permanent Native Hedgerow Planting |
| Waterbodies & Courses | 2m Contours & Spot Heights (m aOD) |
| Agricultural Land within the Promotion Area | Existing PROW & Section to be Temporarily Diverted |
| Proposed Limit of Extraction | |

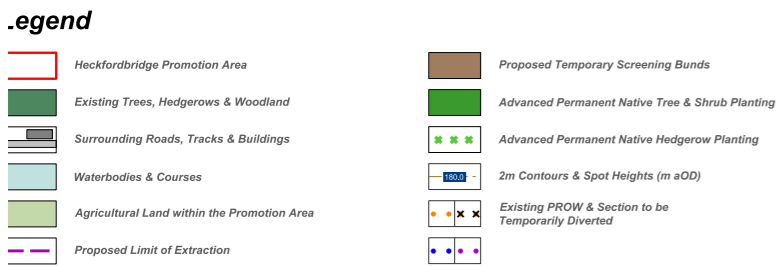
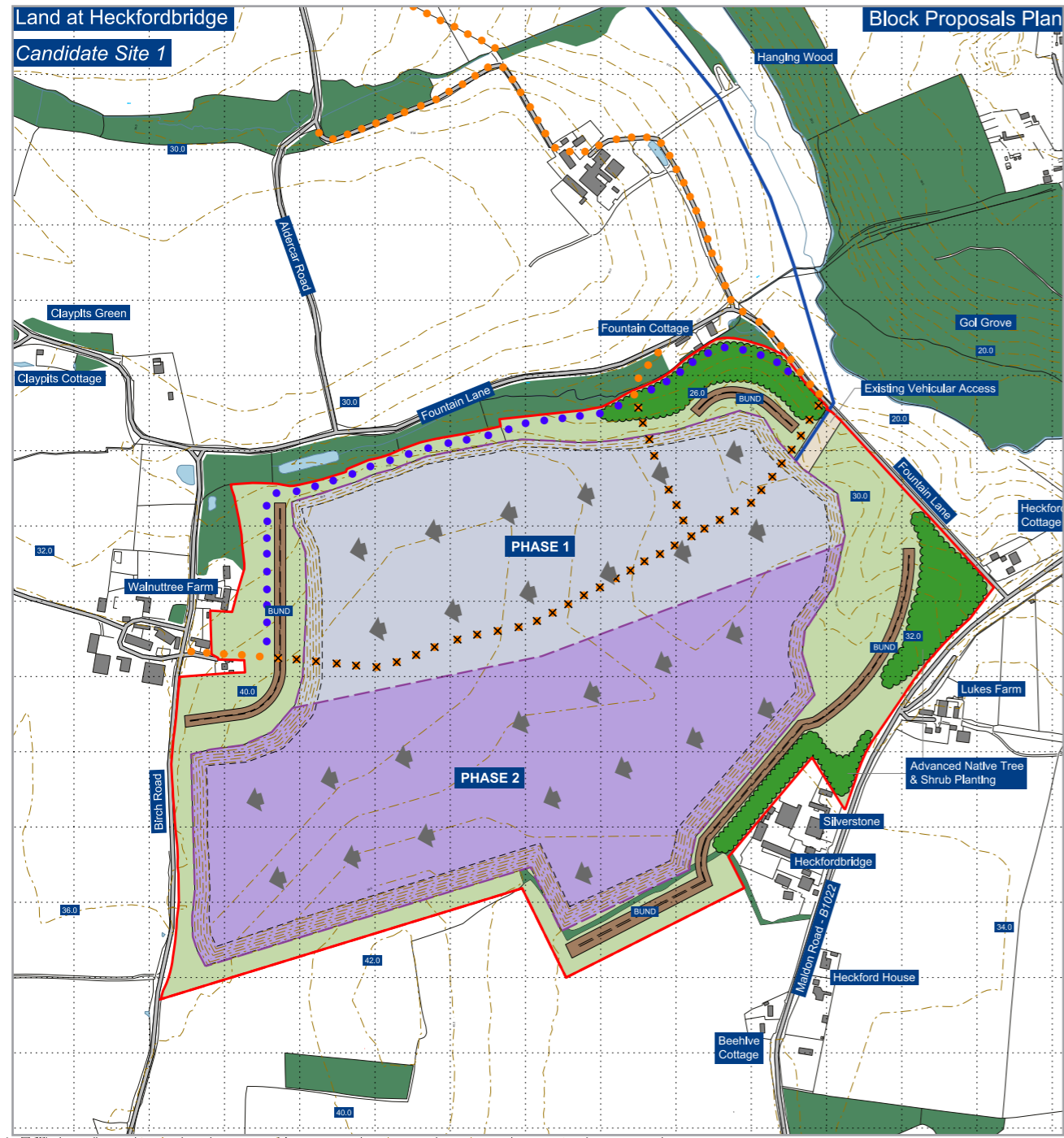
Note. Candidate Site A61: Heckfordbridge Site 1 represents Phases 1 and 2 illustrated on the plan above - please see Appendix A for full scale plans of both Candidate Sites A61 and A62

Candidate Site A62: Heckfordbridge Site 2

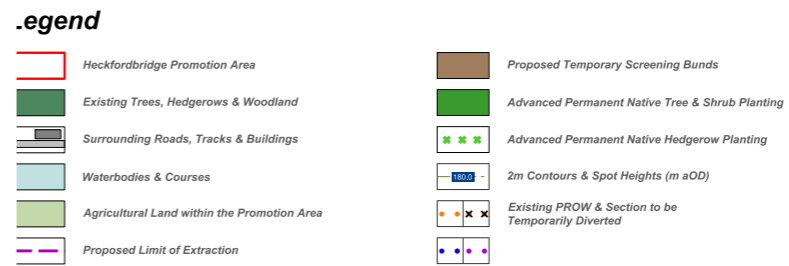
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Candidate Site A61: Heckfordbridge Site 1



Candidate Site A62: Heckfordbridge Site 2

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Strategic Context

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. Preferred site allocations will be presented in the next version of the Replacement Minerals Local Plan, following any reassessment required as part of consultation responses received on the methodology and its application across each site.

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.**



The Sustainability Appraisal published as part of the Consultation, at Section 5.3.3, considers 'Meeting Mineral Needs'. Within this section the MPA identify four sites which have potential for "enabling significantly positive effects in regard to meeting mineral needs." These sites are:

- A48 - Bradwell, Grange Farm (Braintree) - 12.2Mt;
- A49 - Colemans Farm, Hill Broad Farm (Full Site) (Braintree) - 2Mt;
- **A62 - Heckfordbridge, Site 2 (Colchester) - 8.2Mt; and,**
- A93 - Land at Pattiswick Hall Farm (Full Site) (Braintree) - 8.2Mt.

Deliverability

A48 - Bradwell, Grange Farm

Based on extant planning permissions, it is assessed that there is sufficient permitted mineral within the existing Bradwell Quarry to support operations until **2031-2033**. It is therefore unlikely that the 12.2mt of mineral contained within the Candidate Site would come forward prior to this time. Assuming the Candidate Site followed exhaustion of existing permitted mineral, and continuation of the existing ~750,000tpa (best case scenario for Bradwell Quarry as it operates at between 600,000tpa and 750,000tpa), then approximately 5.25mt (43%) - 6.75mt (55%) of the 12.2mt would be released within the plan period.

A49 - Colemans Farm, Hill Broad Farm

Based on extant planning permissions, it is assessed that there is sufficient permitted mineral at Colemans Farm Quarry to maintain production until **2036**. Again, assuming the Candidate Site mineral follows exhaustion of permitted mineral, and output of ~150,000tpa remains as existing, then ~600,000 tonnes of sand and gravel (30%) could be released within the plan period.

A62 - Heckfordbridge, Site 2

Mineral extraction at Heckfordbridge could begin in **2027** following cessation of mineral operations at Land at Bellhouse Farm South (Subject to Planning Permission). This would allow for 13 years of supply within the plan period. At the existing output rate of 500,000tpa, that would equate to a release of 6.5mt of the 8.2mt total – 79% of total supply.

A93 - Land at Pattiswick Hall Farm

This would be a new greenfield site not connected to any existing operations. Factors which could affect the deliverability of this site would be whether there is a mineral operator lined up to operate the site, the lead in time associated with the setup of a new quarry – i.e preparing a planning application and achieving planning permission, internal infrastructure, processing plants and staffing. Finally, the site faces large access issues to overcome in the form of achieving site access directly off a trunk road.

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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 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 ~2.7km of new public access / connectivity and the creation of new habitat, including advanced works, to promote Biodiversity Net Gain (BNG) 	Landscape Character: Medium Visual Amenity: Medium Overall for Criteria: AMBER	Both the initial Candidate Site Submission, and this subsequent re-assessment has been considered by a Landscape Architect. 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 61 and 62. When mitigation / enhancement and the actual Magnitude of Effects of the proposed Candidate Sites are actually considered, it is assessed that the re-measurement should be AMBER .
Biodiversity	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) 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 	AMBER / GREEN	The Candidate Site Submission was supported by a Preliminary Ecological Appraisal prepared by a suitably qualified Ecologist. <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. 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; Level of mitigation required subject to a Habitat Regulations Assessment - The site lies outside of European Protected Sites and Buffer Zones. GREEN;

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		habitat compared to the current situation.		<ul style="list-style-type: none"> Impact to irreplaceable habitats - Due to the proximity of the Candidate Site operations to the Ancient Woodland, it is determined that any potential impact would relate to setting. Full assessment of the Candidate Site development on Ancient Woodland would form part of a planning application. AMBER / GREEN; and, Impact to local designations and priority species - This aspect relates to Local Wildlife Sites (Ancient Woodland) and Hedgerows (Priority Habitat). Any potential impact to Ancient Woodland would be to its setting due to separation distance. Regarding priority hedgerow, a total of ~850m of advanced hedgerow planting will take place prior to any removal. A total of ~1.53km of hedgerow are to be removed, however this would take place progressively with progressive restoration of hedgerow following extraction. Therefore not all hedgerow will be removed at one time. AMBER / GREEN
Historic Buildings	RED / AMBER	<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	<p>A Desk Based Appraisal was produced in support of the Candidate Site Submission.</p> <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 100m standoff to the closest of these listed buildings (Walnut Tree Farmhouse and Barn to the South of Walnut Tree Farm). All other listed buildings benefit from ever greater standoff distances. In addition to the standoffs, there are strategically placed screening bunds between the listed buildings and proposed operational areas. Mitigation measures to ensure an acceptable level of impact are easily implemented and typical features of a mineral operation.
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 further field-based evaluation. Mitigation of impact would be achievable.

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Flooding	AMBER	<ul style="list-style-type: none"> We agree with the RAG Assessment. 	AMBER	<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. A full Hydrological & Hydrogeological Impact Assessment and Flood Risk Assessment will be provided as part of a Planning Application.
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	<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, in their consultation response to the Bellhouse Farm South planning application, did not see need to comment on the proposal; The proposed conveyor route from the Candidate Site would involve crossing Fountain Lane (likely beneath the road), traversing fields and then crossing the Roman River to connect to the existing mineral field conveyor in the Bellhouse Quarry site. The route is purposely designed to avoid the Gol Grove / Hanging Wood Ancient Woodland, and cross the Roman River at a suitable narrow location to connect to the existing conveyor. Due to a moderate level of mitigation, an AMBER assessment is justified.
Access	RED / AMBER	<p>The points raised in transport above are relevant, in addition to:</p> <ul style="list-style-type: none"> We do not consider the methodology for access to be inappropriate, providing it does solely consider the access point where mineral will exit the site to enter market. For this element our issue lies with the consideration of the conveyor, which as stated above, we believe is a Transport consideration. 	GREEN	<ul style="list-style-type: none"> Mineral will leave Colchester Quarry to enter the market via the existing Warren Lane access point. This is the same access as proposed through submission of Candidate Site A95 – Land at Bellhouse Farm South, which was assessed by the RAG Assessment as 'Green'. Therefore, we suggest the submitted Candidate Site should also receive a GREEN assessment.

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Public Rights of Way	RED / AMBER	<ul style="list-style-type: none"> The methodology is overly restrictive with regard to categorising a site a Red/Amber solely for the presence of a PROW within a Site boundary. 	RED / AMBER	<ul style="list-style-type: none"> It is proposed to divert the PROWs during the operational lifetime of the works around the northern boundary of the site. A standoff will be included as well as stretches of screening bunds and advanced planting. Due to the need to divert the existing PROWs, we would suggest this is a moderate level of mitigation required. In addition to the diverted PROWs, advanced provision of permissive rights of way providing access across the entire eastern and southern areas of the site will be included from the beginning of development, increasing the level of public access to the site compared to the current situation
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	AMBER	<ul style="list-style-type: none"> We agree with the RAG Assessment. 	AMBER	<ul style="list-style-type: none"> A full Hydrological and Hydrogeological Impact Assessment will be undertaken to ensure the full hydrological / hydrogeological environment is understood and any relevant mitigation measures recommended and implemented into a future scheme.
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.
Soil Quality	AMBER	<ul style="list-style-type: none"> We agree with the RAG Assessment. 	AMBER	<ul style="list-style-type: none"> The Candidate Site is identified to contain a mix of Grade 2 and 3 agricultural land, and as such meets the Amber criteria. Best practice measures will be implemented in accordance with the MAFF Good Practice Guide for Handling Soils.

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Services & Utilities	RED	<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"> Where the presence of services and utilities is identified, engagement will be held with the relevant stakeholders to ensure impact is mitigated. We suggest that this is would be of moderate impact and require medium level of mitigation in accordance with the criteria of AMBER.
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 50m between commercial receptors and the extraction limits, and 100m for residential receptors. In addition to this, the stand-off areas will include presence of either screening bunds or advanced tree and shrub planting, or both; and, We therefore assess that due to inclusion of typical / relatively easily implemented mitigation measures will not be difficult to achieve, the assessment of Health & Amenity is therefore at most AMBER.
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.

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Comparison of Re-Assessed Site A62 Heckfordbridge against the identified 'Positive Sites for Meeting Mineral Need'

Criteria	A62 – Heckfordbridge (Re-assessed)	A48 – Bradwell, Grange Farm	A49 – Colemans Farm	A93 – Land at <u>Pattiswick</u> Hall Farm
Landscape and Visual Sensitivity	Amber/Green	Amber	Red/Amber	Red/Amber
Biodiversity	Amber/Green	Red/Amber	Amber	Red/Amber
Historic Buildings	Amber	Red/Amber	Red/Amber	Red/Amber
Archaeology	Amber	Amber	Amber	Amber
Flooding	Amber	Amber/Green	Amber	Amber/Green
Transport	Amber	Green	Red/Amber	Red
Access	Green	Red/Amber	Green	Red
Public Rights of Way	Red/Amber	Red/Amber	Red/Amber	Red/Amber
Geo-Environmental	Green	Green	Green	Green
Hydrology, Hydrogeology and Drainage	Amber	Red/Amber	Amber	Red/Amber
Air Quality	Green	Green	Green	Green
Soil Quality	Amber	Amber	Amber	Amber
Services & Utilities	Amber	Amber	Red/Amber	Amber/Green
Health & Amenity	Amber	Red	Red/Amber	Red
Green Belt	Green	Green	Green	Green
Airport Safeguarding Zones	Green	Green	Green	Green

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Conclusion

This report provides a justified re-assessment of Heckfordbridge 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 A62 – Heckfordbridge.

This consultation response document provides an assessment and comparison of the Candidate Site A62 (Heckfordbridge), mainly against three other specific sites. These sites being:

- A48 – Bradwell, Grange Farm (Braintree);
- A49 – Colemans Farm, Hill Broad Farm (Full Site) (Braintree); and,
- A93 – Land at Pattiswick Hall Farm (Full Site) (Braintree).

These sites were chosen as a result of the Sustainability Appraisal produced as part of the Regulation 18 Consultation, which in Section 5.3 provides a summary of the full suite of Candidate Sites potential significant effects identified. Section 5.3.3 of the Appraisal considers 'Meeting Mineral Needs'. The three sites listed above, along with A62 Heckfordbridge are listed within this section as "enabling significantly positive effects in regard to meeting mineral needs".

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.

A review of the current permissions for the quarries associated with three of the assessed Candidate Sites (A48, A49 and A62), and the greenfield site (A93), identified that only Candidate Sites A62 (Heckfordbridge) and A93 (Land at Pattiswick Hall Farm), would be able to contribute to Essex landbank prior to the 2030's, with current permitted mineral at Bradwell Quarry (A48) lasting until 2031-2033, and Colemans Farm Quarry (A49) until 2036.

Candidate Site	Likely year for mineral release	Percentage of mineral likely to be released during Plan Period
A48 – Bradwell, Grange Farm	2031 - 2033	43% - 55%
A49 – Colemans Farm, Hill Broad Farm (Full Site)	2036	30%
A62 Heckfordbridge, Site 2	2027	79%
A93 – Land at Pattiswick Hall Farm (Full Site)	Unknown	Unknown

In terms of the methodologies used in the assessment of the Candidate Sites, we question whether a number of these 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 a number of cases, the RAG Assessment was overly critical and could justifiably be lowered. Whilst we agreed with the RAG Assessment for Archaeology, Flooding, Transport, Public Rights of Way, Geo-Environmental, Hydrology & Hydrogeology & Drainage, Air Quality, Soil Quality, Services & Utilities, Green Belt and Airport Safeguarding Zone; we found the assessment could be justifiably lowered for Landscape & Visual, Biodiversity, Historic Buildings, Access 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 for Heckfordbridge could have been lowered.

Overall, as can be seen from the Summary Table, Candidate Site A62 performs well against the direct comparison sites capable of releasing substantial mineral resource. Resultingly, we request that Heckfordbridge (Candidate Site A62) be allocated within the Replacement Minerals Local Plan 2040.

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