

Replacement Essex Minerals Local Plan – 2025 to 2040

Public Consultation – February/March 2024

Response from Essex Ramblers

Background

Essex County Council are proposing to extend their Minerals Plan to 2040 covering a 15 year period from 2025 and have prepared a draft local plan for public consultation. There are two main parts of this consultation; their supporting text on the issues and policies in their proposed local plan and a site assessment report which contains 52 candidate sites. The suitability of each has been assessed by independent consultants, although at this stage the sites to be included in the final plan have not been identified. Preferred sites for allocation will be chosen once the comments from this consultation have been fully considered.

Plan Policies relating to PRoWs

There is a commitment to ensure that local communities are consulted and their views considered during the development of the proposals and in the determination of the planning applications for each of the allocated sites for minerals extraction.

Paragraph 3.218 of the document states *that 'Improved public access to the natural environment can be provided by creating enhanced opportunities for all recreational users, including walkers, cyclists and horse riders,, improvements to the strategic rights of way network, increased public access through the provision of footpaths and cycleways..'*

Paragraph 5.36 of the document accepts that *'Minerals development can effect public rights of way, open spaces and informal outdoor recreational land. Where rights of way are affected, arrangements for their temporary or permanent diversion must be put in place as part of the proposals. This will apply to definitive routes used by cyclists, horse riders and walkers that either cross or are close to a site.'*

Essex Ramblers Comments

The Ramblers accept the necessity for mineral extraction in Essex, and of course, local communities will be consulted at the planning application stage for each allocated sites.

Paragraph 5.36 gives comfort to the Ramblers that they will have the opportunity to comment on the proposals at the planning application stage However, regarding paragraph 3.218 , improved public access to the natural environment '**should**' be provided, rather than '**can**' be provided.

Where footpaths run alongside existing quarries, there are problems in some places with quarry spoils being heaped on top of the footpaths, making it hard and in some cases impossible to squeeze through. We would welcome some text to insist that quarry owners must respect the PRoW and keep them clear of encroachment.

The plan is likely to create chaos on some of the country lanes impacted by additional sand and gravel lorries. For example, the country lanes surrounding Lt. Braxted Lane and Lea Lane in particular. Furthermore Appleford bridge, on the Braxted Rd., would potentially present a dangerous 'Black Spot' with a combination of commuter traffic approaching the A12 and 30 ton sand and gravel lorries servicing the sites. Today this bridge only permits one-way traffic, with no signal lights.'

This is not directly footpath related, but will affect walkers on those roads and these impacts should be adequately mitigated.

52 Candidate Sites

Independent Consultants have undertaken assessments of the candidate sites on behalf of ECC using a Red, Amber or Green (RAG) assessment. The impact on PRowS is reported in Appendix 1 of the draft Minerals Local Plan. Red and Amber sites were those where PRowS were identified crossing the site, Amber where PRowS bordered a site and Green where there was no impact on PRowS. Most of the sites were identified as having an impact on PRowS, with 35 identified as Red/Amber, 1 Amber and 16 green sites.

ECC accept that the 35 sites identified as Red/Amber, are all *'likely to have a major impact on PRowS and are likely to require high levels of mitigation to make the sites acceptable.'* ECC accept that The Amber Site *'is likely to have a moderate impact on PRowS and is likely to require medium/low levels of mitigation to make the Site acceptable.'*

The Ramblers are pleased that the proposed 'Minerals Local Plan' accepts the need for high levels of mitigation for the Red/Amber sites and some mitigation for the Amber site. The Ramblers would expect this to be enforced, and the Ramblers to be consulted, at the planning application stage.

In principle, the Ramblers would prefer the Green sites to be taken forward but accept that some sites which impact on PRowS are likely to be taken forward. The Ramblers would expect to be consulted on the individual planning applications and would wish to ensure that adequate mitigation was proposed in line with their commitments in paragraphs 3.218 and 5.36 identified above and the commitment above relating to the Red/Amber sites identified in their RAG assessment.

Where PRowS are bounded by hedgerows and lines of trees, these should be retained and spoil heaps should not encroach on the hedge/ tree lines.

At this stage, the Ramblers have not undertaken a detailed assessment of the impact on the 52 candidate sites but will examine in detail each of the allocated sites at the Regulation 19 Consultation stage, before the plan is examined by a Planning Inspector, and at the later planning application stage for each selected site. The maps in Appendix J do not show the details of PRowS and we request that at the Regulation 19 stage, the maps of the selected sites include details of the PRowS.

However, the Ramblers have identified concerns with some of the 52 sites and these are detailed below.

The Ramblers raise a concern at this stage regarding site 74 at Thorrington Hall Farm. PRowS 181_8 and 181_13 are paths that are frequently used on Ramblers walks, eg when walking between Brightlingsea and Thorrington.

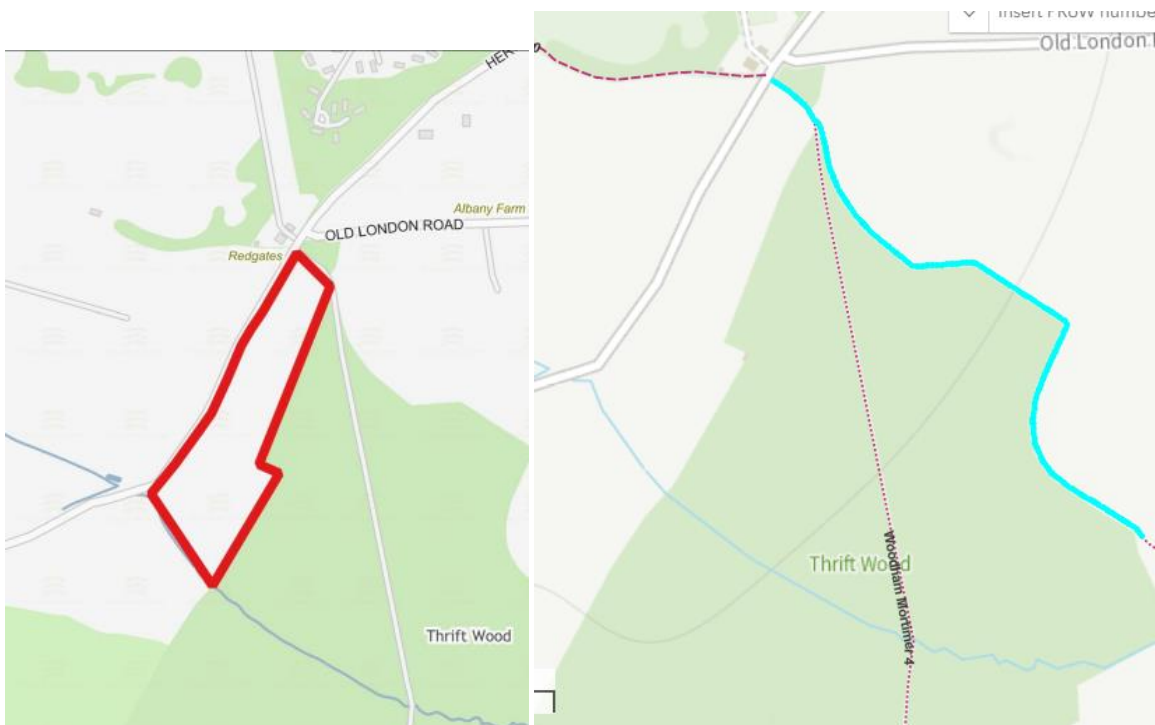
Also, specific to the Maldon and Dengie area, one of our local members has assessed the sites in this area, and the assessment is shown below.

An assessment of the many sites in Braintree District is also included below as 16 (31%) of the 52 potential sites put forward in Essex are in the southern part of Braintree District plus one previously allocated site (A6) and a transhipment site. Several sites are along the A12 corridor & Blackwater River valley between Witham and Kelvedon. Some of the Coleman's Farm sites (A49, A51 & A82) are actually just in Maldon District and the A94 Highfields Farm site is in Braintree, Maldon & Colchester districts. Whilst geology dictates that Braintree District is rich in sand and gravel deposits, the number and size of sites submitted in Braintree District is not proportionate.

Maldon and Dengie Area

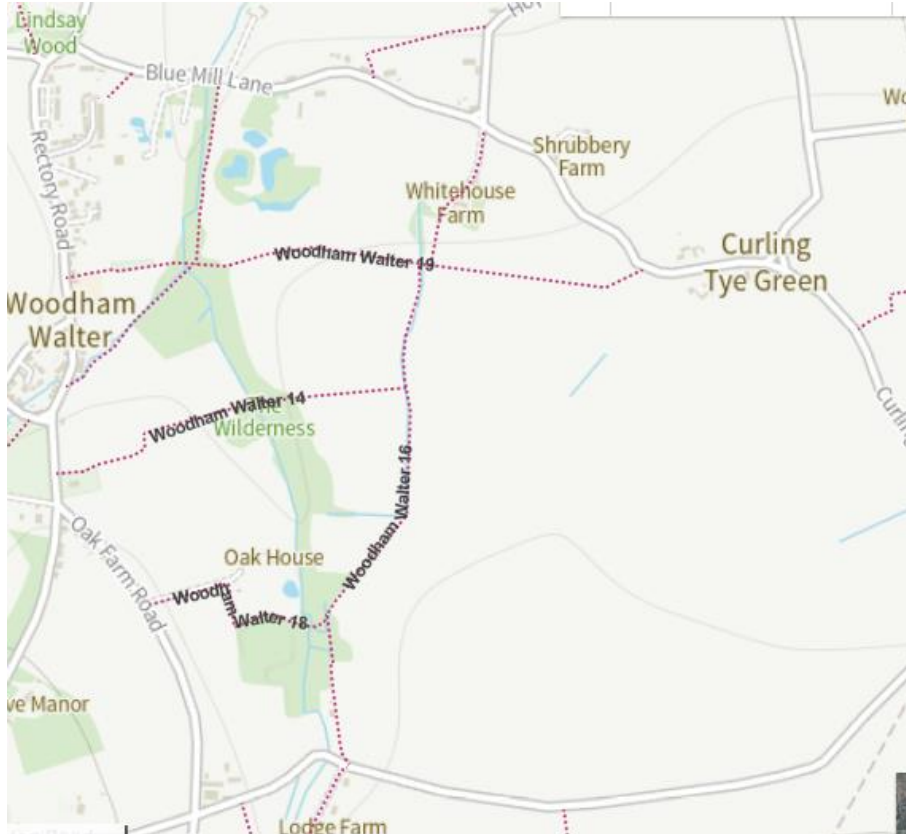
A58 Little Smiths

Footpaths Impacted: Woodham Walter 270-4 and 270-39. Need to ensure that the northerly end of FP39 and 4 remain open to gain access to FP10.



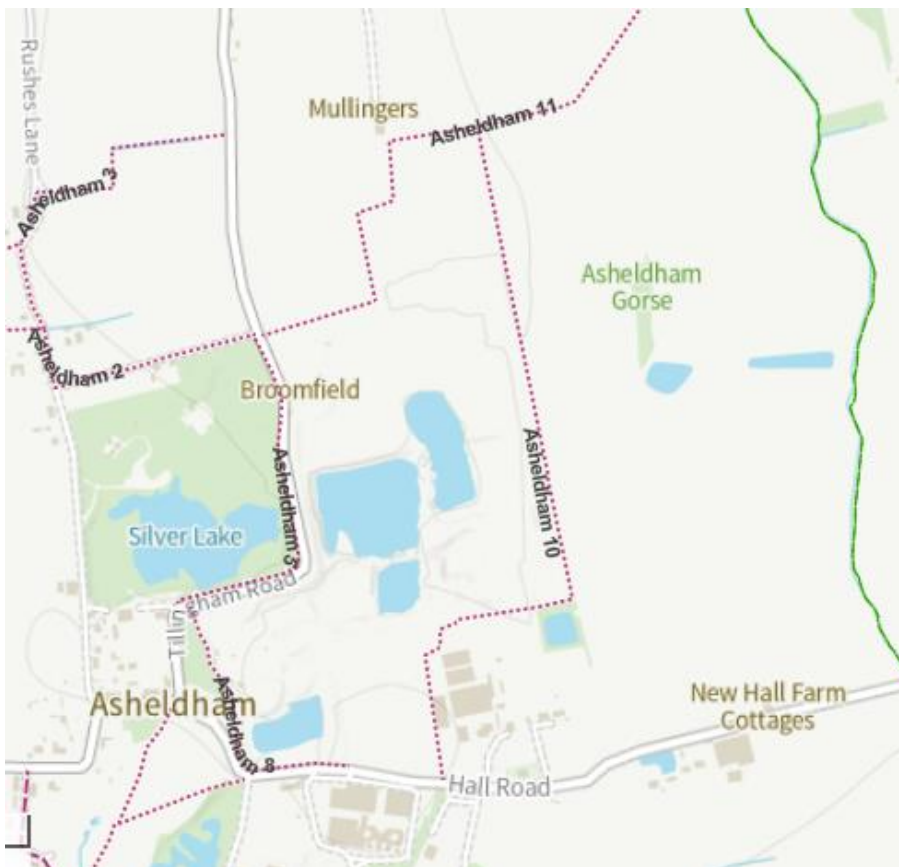
A66 White House Farm Lane

Footpaths Impacted: Woodham Walter 270-14, 270-16, 270-19 and 270-37. This will destroy a number of circular walks based on Woodham Walter.



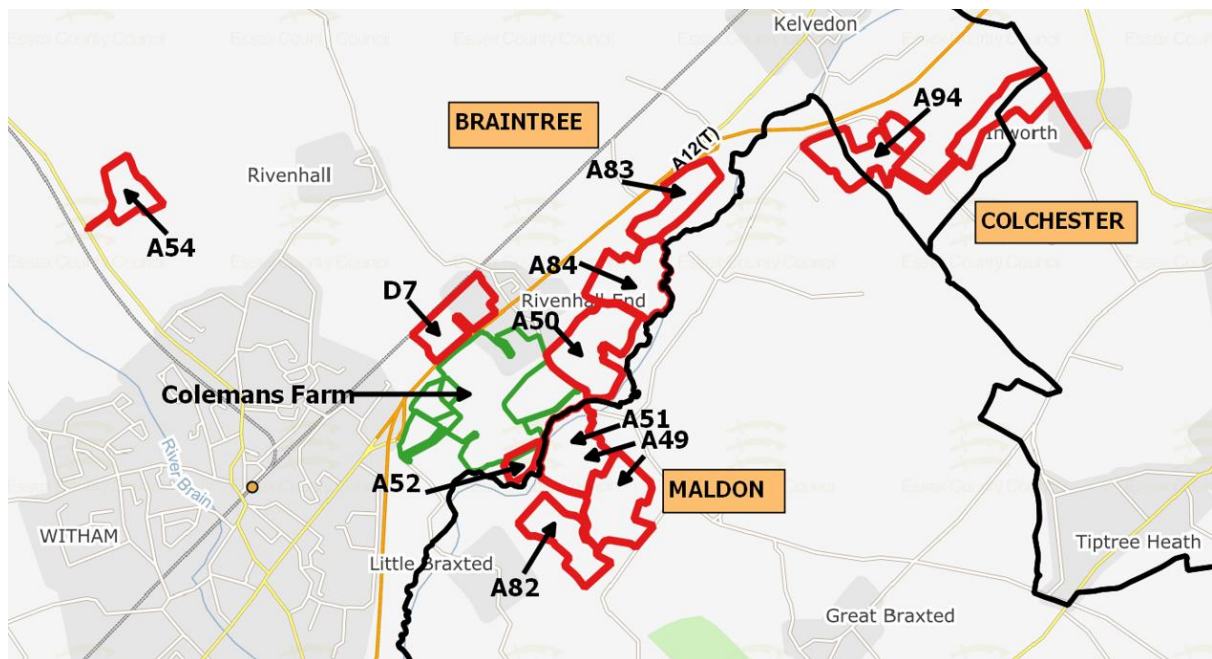
- A64 Land East of Asheldham Quarry [extn]
- A65 Land South of Asheldham Quarry [extn]

Footpaths Impacted: Asheldham 240-10 and 240-11. FP10 will become unusable as it is on the boundary of the existing A64 and A65. FP11 will need to be kept clear as there have always had problems with this.



Sites Along the A12 Corridor between Witham and Kelvedon – Maldon & Braintree Districts

The plans showing the sites along the line of the A12 between Witham and Kelvedon – D7, A50, A84, A83 & A94 - do NOT show the land take for the A12 widening & junction improvement scheme which was granted development consent by the Secretary of State in January 2024. The northern boundaries of the minerals sites would appear to be the southern boundaries/ of the A12 land take. The effect of both A12 & minerals working would almost certainly result in a several years of landscape, traffic and PRoW disruption.



A49 – Colemans Farm Hill Broad Farm (full), Maldon District

A51 – Colemans Farm Hill Broad Farm (north ext), Maldon District

A82 – Colemans Farm, Elm Springs Extension, Maldon District

Footpaths Impacted: Little Braxted 251-1 and 251-2. Great Braxted 246-1. These paths are not heavily used by the Ramblers, but this is due to poor maintenance

These sites with their public footpaths are just south of the river Blackwater and the boundary of Braintree District. They are on the south side of the existing Coleman’s Farm site. The comments of the Maldon Ramblers group are supported. Site restoration would give an opportunity to create an improved PRoW network across these sites. Site A51 extends across the river Blackwater which will pose landscape and flood plain etc issues.



A50 Colemans Farm - Eastern Extension - Appleford Farm – Braintree District
A84 Colemans Farm - Appleford Farm North Extension – Braintree District

Old maps show that there were ProWs across site A50 although there are none now. The connectivity of the footpaths on Site A84 are & will continue to be blighted by the A12, except for Kelvedon FP 92_28. The eastern & NE parts of site A84 are in the river Blackwater floodplain which will pose issues.

Site restoration would provide an opportunity to improve the PRoW network across these and the other Coleman’s Farm sites and the existing site being worked now (green site on the map below). The NW boundaries of these sites are adjacent to the new line of the A12 which is being widened to three lanes so there would be a long period of disruption.

A83 Colemans Farm – Hole Farm Extension – Braintree District

Kelvedon FP 92_27 crosses the site continuing across the river Blackwater as Great Braxted FP 246_17. This connection must be maintained. The NW boundary of this site is adjacent to the new line of the A12 which is being widened to three lanes so there would be a long period of disruption. An A12 ecological mitigation area and A12 SUDS feature will be on the NE side.

A94 – Land at Highlands Farm – mainly Braintree District but also Maldon & Colchester Districts

This site is also adjacent to the A12 widening scheme land take including “borrow pits” on either side of Ewell Hall Chase, which is also Kelvedon FP 92_25. Highfields Solar farm is adjacent to the SE of the in the area of Ewell Hall Chase / Kelvedon FP 92_25. With the adjacent A12 working, it could be challenging to maintain the PRoW connectivity across Ewell Hall Bridge / across the A12 and onto Inworth. This is a popular local route and has been proposed as part of an off-road multi-user route around Inworth and on to Tiptree, by-passing the busy Inworth Road.

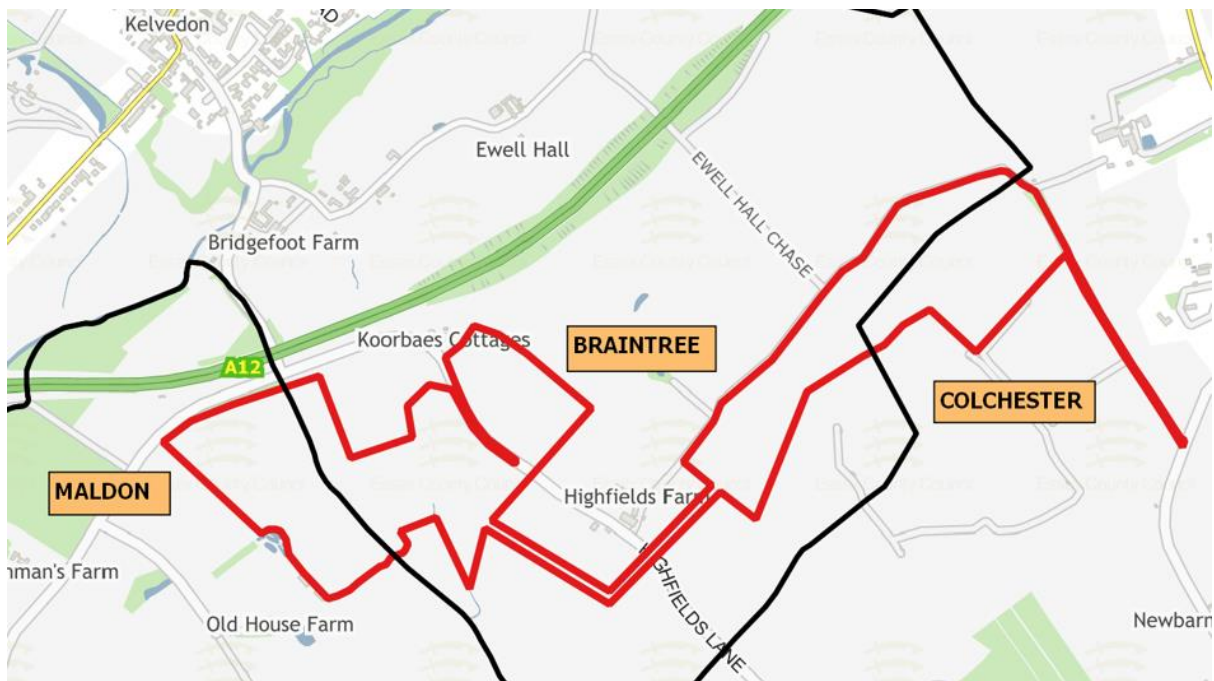
The west end of the site is crossed by two NW-SE footpaths:

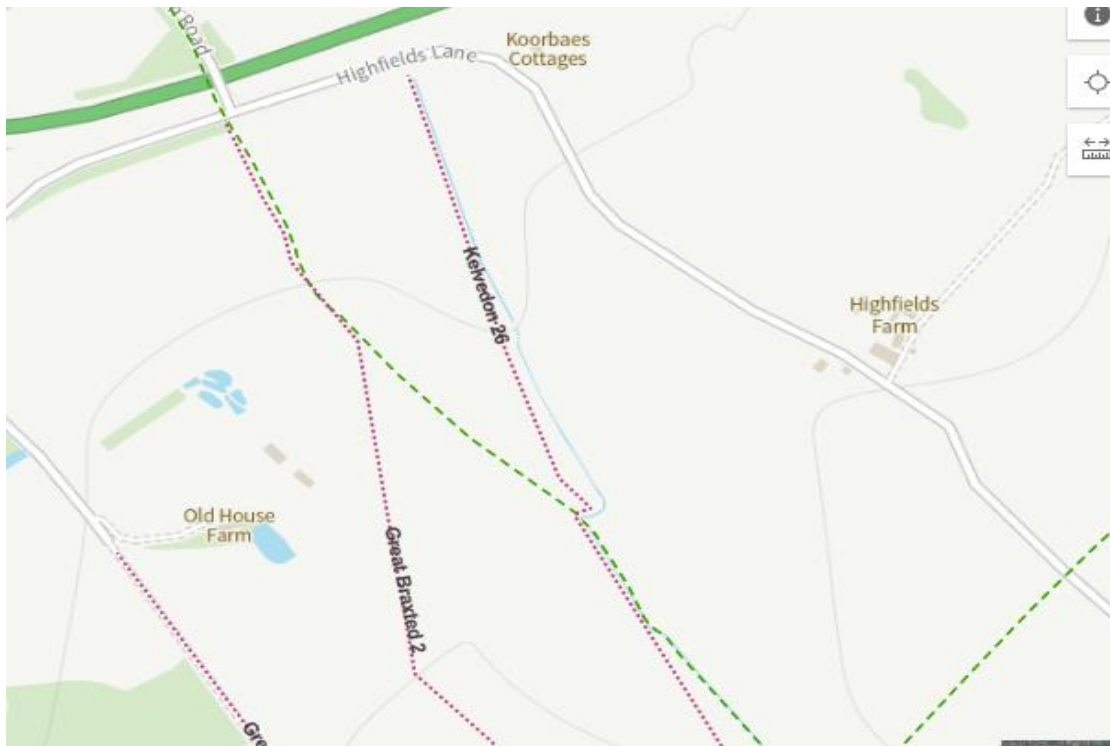
Braintree District footpath impacted: Kelvedon 92_26.

Maldon Footpath Impacted: Great Braxted 246-2.

An off-road NW-SE connectivity must be maintained.

There are concerns about HGV site access if this site became designated. At the east end of the site, Windmill Hill is narrow with a difficult junction to the busy B1023 Inworth Road. At the NW end of the site access to Highfields Lane is via a narrow single-track hump-backed bridge on a bend on Maldon Road over the river Blackwater at Bridgefoot. The junction of Maldon Road and London Road, Kelvedon is difficult with poor sight lines as it is on a bend.





Other Braintree District Sites

(1) Smaller new stand-alone sites - A89 at Stisted, A92 & A93 at Pattiswick and A54 Whitheads Farm

Site A89 at Stisted abuts the A120 along the south side. The A120 is a very busy Highways England trunk road which blights PRoW connectivity south from site. ProW diversions should be achievable.

Sites A92 & A93 at Pattiswick are rural sites with a red/amber RAG rating as regards ProWs which form part of a network. Access would again be off the A120. The proximity of the housing & the church at Pattiswick hamlet is not clearly shown on the plans. Public footpath Stisted 118_19 / Bradwell 67_8, which connects Stisted & Pattiswick hamlet runs through the centre of site A93.

A54 at Whitheads Farm is off the B1018 Crossing Road, a busy road. The site has no PRoWs running across it or adjacent, and so it has a green PRoW RAG rating. There would be no disruption the PRoW network.

(2) Bradwell Quarry extension sites – A6 and A47 & A48

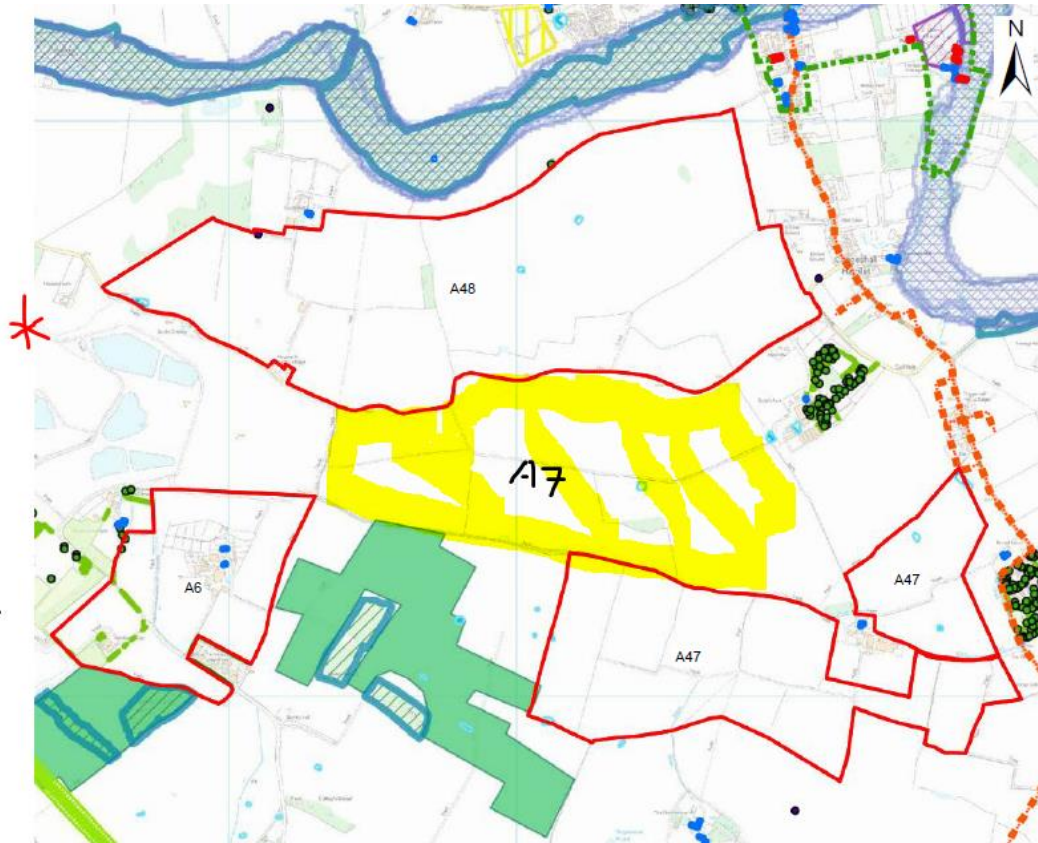
These proposed sites are eastward extensions of the existing Bradwell Quarry sites. The processing plant is to the west near where the Rivenhall Integrated Waste Management Facility (IWWMF aka the Incinerator) is being constructed on a sunken old quarry site. The processing plant & IWWMF are accessed by a haul road from the A120. Not shown on the plans is site A7 – yellow hatched below - which is being worked now from west to east. Cuthedge Lane is the northern boundary and Pantlings Lane / Kelvedon Bridleway 1 — an old lane hedged on both sides - is the southern boundary.

Site A6 although allocated in the 2014 Plan is very close to the buildings being restored for use as an IWWMF information /education centre and for community use at the Woodhouse Farm complex. It is also close to the commercial buildings at the Wayfarers site (old Polish camp). Several footpaths

cross the site and with the restoration and opening up of the Woodhouse Farm complex and the restoration of site A3 to the north, the footpaths should become more attractive and usable. Opening up the A6 site would continue the disruption of these ProWs with a crossing required to access the process plant, and so the PRoW RAG assessment should be more red than amber.

Bradwell Quarry extension sites -A6 and A47 & A48

Site A7 is being worked now. The processing plant is to the west off the map (red asterisk)



Site A47 is south of the current A7 site with a red/amber PRoW RAG assessment. Having been the southern boundary of site A7, Pantlings Lane / Kelvedon Bridleway 1 — an old lane hedged on both sides — would become the northern boundary of site A47. The only PRoW connecting south now is Kelvedon footpath 91_5 but old maps show more footpaths. The A47 site plans do not clearly show the eastern continuation of Pantlings Lane as a public road from Monks farm to Coggeshall Road (Kelvedon) - this east end will be engulfed by site A47. The close proximity of the eastern part of site A47 to the housing at Coggeshall Hall Cottages and around the double bends on Coggeshall Road (Pound Farm & historic Barnados Homes location) is also not clearly shown. To connect to the processing plant and haul road, which would be some distance to the west/ NW, Pantlings Lane would need to be crossed with the associated detrimental effect on this old hedged lane and the walkers, cyclists and horse-riders using this bridleway. A green RAG assessment for access and traffic is questionable and the PRoW assessment should be more red than amber.

Site A48 is north of the current A7 site with a red/amber PRoW RAG assessment. Having been the northern boundary of site A7, Cuthedge Lane - a quiet local lane used by cyclists and horse-riders — would become the southern boundary of site A48. Coggeshall public footpath 72_34 / the Essex Way - which features in many walking guides - would be the northern boundary of site A48. The site includes Coggeshall public footpath 72_35 which provides a useful north south network connection

between the Essex Way and Cuthedge Lane & Kelvedon footpath 92_7. The eastern end of the site is very close to the houses on Coggeshall Road and would include the cricket pitch and associated facilities. The processing plant and haul road would be some distance to the west from the eastern end of site A48 and Cuthedge Lane would need to be crossed.

Site A48 may come forward as a planning application before the Minerals Plan is finalised as the site, together with a northern extension to include the river Blackwater and encompassing the Essex Way / Coggeshall footpath 72_34, is proposed for a Flood Alleviation scheme. It is not clear whether this would mean that the quarrying of site A48 would overlap with the current eastwards-moving quarrying of site A7. In addition to the PRowS affected by the A48 site, Coggeshall public footpath 72_37, with the recently re-constructed historic Dick Nunn's bridge over the river Blackwater, would also be affected. So a PRow RAG assessment of red rather than red/amber would be more appropriate.

(3) Rayne Quarry extension – sites A90 and A96

Site A90 is a northern extension of the existing Rayne quarry. Only one footpath, Rayne footpath 103_4, which should be able to be diverted satisfactorily, crosses the NE end of site A90. A PRow RAG assessment of red/amber is probably unnecessarily pessimistic.

Site A96 is a narrow southern extension of the existing Rayne quarry between Dunmow Road and the (new) A120. The PRow network was disrupted when the new A120 was constructed and so there are no longer any PRowS through this site.

There should be opportunities to create an improved PRow network across the Rayne quarry sites at restoration as the current network is very sparse.

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