



**place  
services**



## **Essex County Council Minerals Local Plan 2014**

### **Sustainability Appraisal and Strategic Environmental Assessment: Adoption Statement**

**July 2014**



## Contents

<b>1</b>	<b>Introduction and Requirement for Adoption Statement.....</b>	<b>1</b>
1.1	Background .....	1
<b>2</b>	<b>How environmental considerations have been integrated into the Essex Minerals Local Plan 2014.....</b>	<b>2</b>
<b>3</b>	<b>How the SA/SEA Environmental Report has been taken into account .....</b>	<b>3</b>
<b>4</b>	<b>How the results of consultations have been taken into account .....</b>	<b>6</b>
<b>5</b>	<b>The reasons for choosing the Essex Minerals Local Plan 2014 as adopted in light of other reasonable alternatives .....</b>	<b>9</b>
<b>6</b>	<b>The measures decided concerning the monitoring of the Essex Minerals Local Plan 2014 .....</b>	<b>18</b>

## List of Tables

Table 1:	How the SA/SEA Environmental Report has been taken into account.....	4
Table 2:	How the results of consultations have been taken into account.....	6
Table 3:	The reasons for choosing the Minerals Local Plan as adopted in light of other reasonable alternatives: Strategic Policy .....	9
Table 4:	The reasons for choosing the Minerals Local Plan as adopted in light of other reasonable alternatives: The Minerals Provision Figure.....	12
Table 5:	The reasons for choosing the Minerals Local Plan as adopted in light of other reasonable alternatives: Site Allocations .....	13
Table 6:	The reasons for choosing the Minerals Local Plan as adopted in light of other reasonable alternatives: Selection Methodology of Reserve Sites .....	16
Table 7:	The reasons for choosing the Minerals Local Plan as adopted in light of other reasonable alternatives: Development Management Policy.....	16
Table 8:	The measures decided concerning the monitoring of the Minerals Local Plan .....	18



# **1 Introduction and Requirement for Adoption Statement**

## **1.1 Background**

Once a plan or programme has been adopted, the Strategic Environmental Assessment (SEA) Directive requires those responsible for preparation, to provide the public and the Consultation Bodies with information on how environmental considerations and consultation responses are reflected in the plan or programme, the reason for choosing the plan or programme as adopted in light of reasonable alternatives and how its implementation will be monitored in the future.

The Environmental Assessment of Plans and Programmes Regulations 2004 states that as soon as reasonably practicable after the adoption of a plan or programme for which an environmental assessment has been carried out under these Regulations, the responsible authority shall demonstrate the following:

- (a) how environmental considerations have been integrated into the plan or programme;
- (b) how the environmental report has been taken into account;
- (c) how opinions expressed in response to -
  - (i) the invitation referred to in regulation 13(2)(d);
  - (ii) action taken by the responsible authority in accordance with regulation 13(4),have been taken into account;
- (d) how the results of any consultations entered into under regulation 14(4) have been taken into account;
- (e) the reasons for choosing the plan or programme as adopted, in the light of the other reasonable alternatives dealt with; and
- (f) the measures that are to be taken to monitor the significant environmental effects of the implementation of the plan or programme.

The aim and structure of this report is to address these requirements related to the adoption of the Essex Minerals Local Plan 2014.

## **2 How environmental considerations have been integrated into the Essex Minerals Local Plan 2014**

The final SA Environmental Report sets out the sustainability baseline and context, identifies the sustainability issues affecting the County and explains the development of the SA framework. It explains the different components of the Minerals Local Plan including the strategic objectives, spatial strategy and sites. It includes thorough explanations of the appraisal methodology and appraisal findings and it gives conclusions and recommendations for monitoring.

The sustainability issues for the plan area were identified using the review of the relevant plans and programmes together with the analysis of baseline information for the district. These issues were used to develop Sustainability Objectives which were used to appraise the objectives, policies and site allocations identified through the plan preparation process. Baseline information provided a basis for taking an objective view on the likely impact of policies on each SA Objective. Since the baseline also provided comparative data for conditions in other areas and information about trends, a judgement could also be made concerning the significance of such an impact.

With regard to the MLP, three separate Minerals Issues and Options papers were published for consultation in December 2005 (Core Strategy, Development Control Policies and Site Allocation Papers). A further Site Allocations Issues and Options Paper was published in March 2006. Subsequently the approach was reviewed to merge the Core Strategy, Development Management Policies and Strategic Site Allocations into one document. A single Further Issues & Options Paper went out for consultation in January 2009. As a result of more sites being set out, an additional sites Issues and Options paper went out on public consultation in August 2009. This was then followed by the Preferred Approach document, incorporating the policies and site allocations, in December 2010. In August 2011 a further site allocations Issues and Options paper was published for consultation. The Pre-Submission version plan was published for consultation in January 2013 and a schedule of Main Modifications document was published in February 2014.

Work on the MLP has been underway for some time, and the SA/SEA process has been an integral part of the production. SA/SEA work was initially undertaken by Essex County Council, then, continued by Eunomia, until being brought back in-house in 2009.

Previous documents produced as part of the SA/SEA process include:

- Original Scoping Report, 2005
- Revised Scoping Report (Eunomia), June 2008
- Minerals Development Document: Issues and Options. First Stage Environmental Report (Eunomia), January 2009
- Preferred Approach SA/SEA Environmental Report December 2010
- SEA Statement on Additional Sites August 2011
- Replacement Minerals Local Plan: Pre-Submission SA/SEA Environmental Report, November 2012
- Essex County Council Replacement Minerals Local Plan: Main Modifications and Site Assessment Report SA/SEA Addendum, February 2014

These documents have all been made publically available and have been published on the Essex County Council website.

Carrying out SA/SEA throughout the plan preparation as part of an integrated approach has ensured that the sustainability considerations identified have been addressed through subsequent iterations of the Minerals Local Plan from preliminary work to adoption.

### **3 How the SA/SEA Environmental Report has been taken into account**

The SA/SEA process has contributed to the development of the Essex Minerals Local Plan 2014 by providing an independent assessment of the sustainability of the proposed options throughout their development. The Pre-Submission Stage Environmental Report demonstrates how the sustainability objectives have been taken into account and integrated into the development of the Essex Minerals Local Plan 2014. This provides an audit trail and formal statement on the assessment of options, alongside the main document at each stage of the process.

The SA/SEA process was carried out alongside the Minerals Local Plan and is a key output of the plan making process which began with the production of the SA/SEA Scoping Report. This involved identifying the sustainability issues and objectives for the Minerals Local Plan, as well as identifying relevant baseline information and indicators. The SA/SEA Scoping Report was publicly consulted upon and comments received helped to create a final set of sustainability objectives, which were then used to test the options of the Minerals Local Plan at each formal consultation stage. All iterations of the Minerals Local Plan and previous Mineral Development Documents consulted upon were accompanied and informed by an Environmental Report.

The following table outlines in further detail how the recommendations of each Environmental Report consulted upon in the process were taken into account.

**Table 1: How the SA/SEA Environmental Report has been taken into account**

Chapter / Policy	Document	SA/SEA Recommendation	Taken into account?
The Spatial Vision	Pre-Submission working draft	Where 'climate change adaptation' is referenced in (H) Restoration and After-Use, it would be useful to offer a definition of what this means and how it is different from (E) Climate Change.	This was clarified as a reference to those measures included in the specific climate change policy (S3) in the MLP
Aims and Strategic Objectives	Pre-Submission working draft	Clarification is needed regarding the deliverability and mechanisms of controlling 'pollution' as to have no impacts on social receptors.	This was amended for the final Pre-Submission Draft MLP to remove this element.
The Strategy and Policy S2 Strategic Priorities for Minerals Development	Preferred Approach MDD	It was recommended that sites should only be extended where it can be shown that the value of minerals to be extracted outweighs any potential negative effects on the natural and built environments, human health and local amenity.	All relevant impacts were included within the LMA's site selection criteria.
Policy S3 Climate Change	Further Issues and Options MDD	It was recommended that the policy be rewritten to be more specific about how climate change mitigation or adaption could occur	Through Policy S3, applications for minerals development shall have regard to 6 criteria related to possible climate change mitigation or adaption.
Policy S4 Reducing the Use of Mineral Resources	Preferred Approach MDD	Sustainable construction could be more clearly defined to eliminate uncertainty surrounding the impacts on environmental based indicators	Recommendations about sustainable construction definitions are satisfied with references to a number of national and local standards and policies to inform applicants
Policy S6 Provision for Sand and Gravel Extraction	Preferred Approach MDD	It was recommended that positive impacts on sustainable transport could be realised by ensuring that landbanked material is distributed around the County.	The policy has progressed to promote a flexible approach in terms of new site proposals as well as the scale/landbank to respond to future development, particularly in line with the spatial strategy and centres for growth in the plan area.

<p>Policy S8 Safeguarding Mineral Resources and Mineral Reserves</p>	<p>Preferred Approach MDD</p>	<p>It was recommended that sufficient information is released in an inclusive fashion to alert local residents to the possibility of mineral extraction occurring before a site is developed.</p>	<p>Developed to include clearer circumstances what stance the MPA will take during consultation with LPAs including any planning application within an MCA and any land-use policy or allocation within a proposed Local Plan.</p>
<p>Policy S11 Access and Transport</p>	<p>Pre-Submission working draft</p>	<p>It was recommended that the access implications of potential post-working restoration details of proposals be included within the policy; the transport implications of post-restoration proposals may be more disruptive and have greater impacts on the highway network than movements to and from the site whilst working</p>	<p>This recommendation was more relevant to individual proposals rather than strategic policy and as such has been included within Policy DM1.</p>
<p>Policy S12 Mineral Site Restoration and After Use</p>	<p>Pre-Submission working draft</p>	<p>It was recommended that potential confusion surrounding what is 'feasible,' 'essential' and 'necessary' is clarified within the hierarchy, and under what circumstances low level restoration regarding landfill would not be as feasible as restoration by landfill.</p>	<p>The recommendation was not taken into account. It was viewed that a hierarchy of restoration with inert landfill as the least desirable was important to specify in the policy. The circumstance under which low level restoration regarding landfill would not be as feasible as restoration by landfill is where the site is a preferred inert landfill site in the emerging Waste Local Plan.</p>

#### 4 How the results of consultations have been taken into account

The SA/SEA regulations require that the authorities referred to in Article 6 (3) shall be consulted when deciding upon the scope and level of detail of information that is to be included in the final Environmental Report. These authorities are referred to as the statutory consultees and include the Environment Agency, English Heritage and Natural England.

Formal consultation on the SA/SEA has been undertaken alongside each stage of consultation on the Minerals Local Plan / Minerals Development Document and following these, responses were analysed where they specifically related to aspects of the SA/SEA. Where relevant and deemed necessary, these were taken into account at the next stage of SA/SEA work. The following table chronicles those consultation responses that subsequently influenced the SA/SEA.

**Table 2: How the results of consultations have been taken into account**

STAGE: Scoping Report 2008		
Consultee	Comment	Action
Environment Agency	Table 1: List of Plans and Programmes: The East of England Plan (RSS14) is now in its final adopted form. Please refer to this document for the most up to date information. PPS12 has now been reviewed and updated (June 2008). Please refer to the updated version. Chelmsford BC have now adopted their Core Strategy LDD. This should be read in relation to any minerals development within Chelmsford.	Accepted, changes made.
Natural England	We are concerned that geology is not identified as a key issue and therefore is not carried forward into the Objectives and Questions (Table 4).	The comments regarding the omission of geology as a key issue have been noted and objective 1 has been amended to reflect this.
Tendring District Council	Section 6.0 of the baseline report refers to land use and identifies key settlements. Clacton-on-Sea is the largest settlement within the District and should therefore be identified in this paragraph.	Added as a key settlement.
Brett Aggregates and Minerals Services Ltd	There is no mention of the minimum 15 year time frame for the core strategy within the entire Scoping Report.	The plans timeframe will be dealt with in the Environment Report.
STAGE: Preferred Approach SA/SEA & Additional Sites SA/SEA		
Consultee	Comment	Action
Natural England	Having reviewed the SA/SEA, we agree with the Conclusions that it is not (yet) possible to determine how Sites A44, A45 and A46 will impact on biodiversity and landscape. However, it is clear that there are strong negative impacts on the sustainable use of land in the short and medium terms (with respect to Grade 1 and Grade 2 agricultural soils). Finally, we note that a full SA/SEA	Noted. Full appraisals were undertaken at the Replacement MLP Pre-Submission stage.

SA/SEA Adoption Statement July 2014

	appraisal will be undertaken to accompany the MDD: Submission Draft.	
Maldon District Council	The Sustainability Appraisal prepared by Essex County Council fails to consider a wide range of issues affecting the proposed development, as noted in para. 2.4 of the Issues and Options Paper, August 2011, including: Biodiversity, Air quality, Greenhouse gases, Landscape character, Economy, and Transport.	Issues surrounding biodiversity, landscape character and transport have been addressed in the Pre-Submission SA/SEA site appraisals.
	It is not possible to address crucial elements of the impacts of the proposed workings and further information is required at this stage to enable further consideration. This is particularly important as the SA itself notes that; "all three sites (including A44) have been assessed as having strongly negative impacts on the sustainable use of land in the short and medium terms."	Impacts were relevant to Grade 2 soil under Sustainability Objective 4.
English Heritage	We are concerned that Table 2.4 Appraisal of the Short, Medium and Long Term Impacts in the Sustainability Appraisal does not give sufficient weight to the historic environment impacts of the above sites (A44, A45, A46 & D6).	Noted. This has been addressed in the Pre-Submission SA/SEA site appraisals.
Rep 2411	The assessment is flawed because it does not consider the cumulative impact on the local community of the Airport and the quarry combined. (re: noise, air pollution and stress).	Noted. Cumulative impacts are explored in the SA/SEA assessment of sites where information is available.
<b>STAGE: Pre-Submission SA/SEA Environmental Report</b>		
<b>Consultee</b>	<b>Comment</b>	<b>Action</b>
Natural England	Natural England notes that the Environmental Report has been prepared to document the SA/SEA undertaken throughout the Minerals Local Plan's preparation up to the Pre-Submission version. We are satisfied that the report fulfils the requirements of the Environmental Assessment of Plans and Programmes Regulations 2004 in its consideration of baseline information, sustainability objectives, appraisal methodology and consideration of alternatives. The assessment identifies that development of the preferred sites will have largely positive impacts on the natural environment; however, some long-term negative effects are predicted for some sites, particularly in relation to soils and landscape. These site specific issues and mitigation recommendations are addressed in Appendix 5 and include recommendations,	Noted. Site appraisals were checked for overall consistency.

	for example, for the retention of agricultural soils for restoration and the employment of stand-off distances/buffers, bunding and screening to minimise impacts on landscape and visual amenity.	
--	--	--

## 5 The reasons for choosing the Essex Minerals Local Plan 2014 as adopted in light of other reasonable alternatives

The Essex Minerals Local Plan 2014 policies, site allocations, vision and aims and objectives have been the result of a significant plan-making process. In this process, numerous alternative approaches have been explored and consulted upon.

Alternatives for all these elements are chronicled in the following tables, alongside the reasons for their rejection of progression. These correspond to alternative approaches to:

- The Spatial Vision
- The Aims and Strategic Objectives
- The Strategic Policies and Strategy
- The Minerals Provision Figure
- The Site Allocations
- The selection methodology for Reserve Sites
- The Development Management Policies

**Table 3: The reasons for choosing the Minerals Local Plan as adopted in light of other reasonable alternatives: Strategic Policy**

Policy	Alternative explored in plan-making process	Reason for non-progression
The Spatial Vision	No reasonable alternatives in conformity with national policy.	N/A
Aims and Strategic Objectives	No reasonable alternatives in conformity with national policy.	N/A
S1 Presumption in Favour of Sustainable Development	No reasonable alternatives in conformity with national policy.	N/A
The Strategy & S2 Strategic Priorities for Minerals Development	<p>Option 1 - Predominantly Extensions to Existing Extraction Sites (Further Issues and Options stage)</p> <p>Option 2 - Dispersed Spread of Sites Across the County (Further Issues and Options stage)</p> <p>Option 3 - Concentrated Supply of Sites with Some Dispersed Sites (Further Issues and Options stage)</p> <p>Option 4 - to provide for new sites in the west of the County to re-dress the spatial imbalance and limit the need for HGVs to travel from the centre or east through additional weighting in the site selection process to make the 'dispersal'</p>	<p>Option 1 was not progressed as it would fail to adequately address the sustainability issues around mineral miles. Not-with-standing this it is noted that the majority of sites will be extension sites.</p> <p>Option 2 was not progressed due to dispersal (in isolation) being difficult to deliver with numerous new sites needed, it ignores the investment and efficiencies that operations from existing sites have, and was not favoured by respondents as a result of consultation. Not-with-standing it makes sense to include a degree of spread consistent with the best possible geographic dispersal.</p> <p>Option 3 was not progressed due to it being contrary to the principle of promoting market competition, transport costs and emissions being greater to the M11 and Haven gateway from a central concentration, and the implication</p>

	component of the spatial strategy viable (Preferred Options stage)	<p>of increasing road distances from source to use. Not-with-standing this it is noted that due to geology the majority of sites will be located in the central and north eastern parts of the County.</p> <p>Option 4 was not progressed further due to consultation responses at the Preferred Approach stage stating that the method used to achieve this had not been fair, particularly with regards to the western weighting of sites. Not-with-standing it makes sense to include a degree of spread consistent with the best possible geographic dispersal.</p>
S3 Climate Change	Option 1 – To not have a specific Strategic Policy on climate change and rely such issues to be addressed through the locational and operational requirements of mineral sites (Further Issues and Options stage, Preferred Options stage)	Option 1 was not progressed in favour of a policy requiring applications for minerals development to demonstrate how they will incorporate effective measures to minimise greenhouse gas emissions and to ensure effective adaptation and resilience to future climatic changes
S4 Reducing the Use of Mineral Resources	<p>Option 1 – require a higher standard of sustainable construction to be set out in the MLP in the expectation that it would become mandatory at the national level in due course. (Preferred Approach stage).</p> <p>Option 2 - a 'do nothing' approach (Preferred Approach stage).</p>	<p>Option 1 was not progressed as there was no compelling case as to what standards or codes need to be specified in Essex that came through consultation. There may also be economic costs resulting from this alternative.</p> <p>Option 2 was not progressed as the MPA would not be taking any initiative to address sustainable construction, contrary to national policy at the time. In addition, a reliance on national initiatives may not provide solutions that are flexible enough to address local characteristics / circumstances.</p>
S5 Creating and Safeguarding a Network of Aggregate Recycling Facilities	Option 1 - to include a criteria only based approach to aggregate recycling to promote strategic and non-strategic aggregate recycling sites (Preferred Options stage).	Option 1 was not progressed as by not safeguarding sites there is a risk that existing aggregate recycling sites would be displaced by higher value land uses over the course of the Plan period. Many consultation responses noted the lack of geographic coverage of the three sites proposed in the Further Issues and Options paper (2009) and so it is important to safeguard key facilities to provide such coverage.
S6 Provision for Sand and Gravel Extraction	<p>Option 1 - to partially review the Plan based on land won sand and gravel only (Further Issues and Options stage, Preferred Option stage).</p> <p>Option 2 - a whole and partial review of the plan/landbank consisting of a 7 year landbank based on the agreed sub-regional apportionment (Further Issues and</p>	<p>Option 1 was not progressed as it would not address any important changes to national or regional policy during the Plan period, and the focus of any review would rest on primary extraction.</p> <p>Elements of Option 2 were taken forward to the Preferred Options stage</p> <p>Option 3 was not progressed at this stage where it may not meet the agreed sub-regional</p>

SA/SEA Adoption Statement July 2014

	<p>Options stage).</p> <p>Option 3 - a combined provision of both the landbank and outstanding “planned provision” still to come forward up to 10 years (Further Issues and Options stage).</p> <p>Option 4 - a landbank based on a 5 year review from the plan’s adoption (Further Issues and Options stage).</p>	<p>apportionment figure.</p> <p>Elements of Option 4 were taken forward to the Preferred Options stage.</p>
S7 Provision for Industrial Minerals	No reasonable alternatives in conformity with national policy.	N/A
S8 Safeguarding Mineral Resources and Mineral Reserves	<p>Option 1 - State the scales of development within an MSA that would require consideration of prior extraction by the applicant (Further Issues and Options stage)</p> <p>Option 2 – State a requirement for the provision of information relating to prior extraction potential to be submitted with an application (Further Issues and Options stage)</p> <p>Option 3 - Protect and permit identified mineral reserves through MCA designation only (Further Issues and Options stage)</p> <p>Option 4 - Delineate the economic mineral resource around preferred sites only. The MPA would seek consideration of prior extraction before any incompatible development at such sites could occur and would oppose inappropriate development within 250m of a preferred mineral allocation site (Preferred Options stage).</p>	<p>Elements of Option 1 were progressed to the Preferred Approach stage.</p> <p>Elements of Option 2 were progressed to the Preferred Approach stage and beyond.</p> <p>Option 3 was not progressed as it does not seek to safeguard minerals reserves beyond those specific sites identified within the plan.</p> <p>Option 4 was not progressed as at the time, the change in national policy with MPS1 was to avoid a narrow definition to just mineral sites needed to make up an apportionment. This approach has been continued within the NPPF. In addition to this the alternative approach may miss opportunities for prior extraction beyond preferred sites which would otherwise require extensive investigation works, allow mineral resources to be sterilised, and also result in a need for aggregate to be bought in from elsewhere.</p>
S9 Safeguarding Mineral Transshipment Sites and Secondary Processing Facilities	Option 1 - The permanent safeguarding of existing rail heads and wharfage considered to be of strategic importance for the maintenance of existing mineral infrastructure for the supply of aggregates needed in Essex beyond the plan period. Their safeguarding needs to be continued to prevent their conversion to other uses, in the possibility of such proposals for other development being made (Preferred Approach stage).	Option 1 was not progressed as it was not considered a reasonable alternative to permanently safeguard existing mineral transshipment infrastructure beyond the plan period as the approach is not applicable and the consequences could be significant and irreversible.
S10 Protecting and	Option 1 - To not set out any	Option 1 was not progressed as it would not give

Enhancing the Environment and Local Amenity	relevant policy; where development management and the consideration of applications would be informed by relevant national policy and guidance (Preferred Approach stage).	decision makers any guidance on issues of general relevance to Essex, may weaken the ability of Officers to undertake successful negotiations and decision makers to ensure appropriate levels of on-site mitigation, and it provides little reassurance to a potentially affected community that their concerns would be addressed.
S11 Access and Transport	No alternatives were considered reasonable or deliverable by a MPA	N/A
S12 Mineral Site Restoration and After Use	<p>Option 1 - A Living Landscape approach with the aim of bringing fragmented landscapes back to life.</p> <p>Option 2 - Prioritising habitat restoration and enhancement on a case by case basis, with no specific target or direct link with other national or local initiatives.</p>	<p>Option 1 was not progressed where it was not specifically supported by national planning policy; links between Living Landscape and the LAA process are likely to change during the course of the MLP, and the correlation between suggested mineral sites and Living Landscape areas being mixed.</p> <p>Option 2 was no progressed where it was deemed as missing an opportunity for more strategic 'spatial planning' and integration with biodiversity targets, it does not prioritise or distinguish between different habitats and therefore underrepresented habitats may be ignored, and also it would be difficult to monitor the success of the approach and its wider contribution to goals for improving biodiversity.</p>

**Table 4: The reasons for choosing the Minerals Local Plan as adopted in light of other reasonable alternatives: The Minerals Provision Figure**

Alternative explored in plan-making process	Reason for non-progression
NPPF Aggregate Supply Provision – Land won sand and gravel sales (10 year rolling average)	<p>Recent sales figures in the plan area are currently below the sub-national apportionment figure. Whilst sales have been below the sub-national apportionment in each of the 10 years that would be captured by the NPPF derived provision methodology, it is only since the recession that this difference has been more than 10%. This 10% difference is considered to be a suitable 'buffer' and equates to ensuring a 'steady and adequate' supply of minerals as required by the NPPF. It is evidently not sustainable for mineral sales to exceed provision as this would mean a reduction in overall permitted resources. Since 2008, sales can be seen to diminish relatively quickly and this is considered to be as a result of the recession rather than a more natural reduction in need/sales. As such, a 10 year sales average including the years 2008 – 2012 would equate to planning for a continuation of the recession which isn't considered to equate to positive plan making.</p> <p>Additionally, the NPPF and the NPG allow an MPA to take other relevant local factors into account when determining their minerals provision over the lifetime of their Minerals Local Plan and as such are not bound to accept the ten year average of rolling sales if evidence</p>

	should point to the contrary. Such evidence includes locally derived growth forecasts which exceed those forecasts based on the abolished East of England Regional Spatial Strategy.
--	--

**Table 5: The reasons for choosing the Minerals Local Plan as adopted in light of other reasonable alternatives: Site Allocations**

Alternative site explored in plan-making process	Reason for non-progression
<b>Primary Sand &amp; Gravel Extraction</b>	
A1 Appleford and Colemans Farm, Little Braxted Lane, Witham	Unacceptable adverse impact on international or national historic environment designation.
A2 Bradwell Quarry, Rivenhall Airfield	Planning permission (ESS/32/11/BTE) for sand and gravel extraction was granted in February 2012 for the majority of site A2.
A8 Bradwell Quarry, Rivenhall Airfield	Issues with timeframes and the site not being contiguous with current workings.
A10 Covenbrook Hall Farm, Stisted	The site's proximity to the Haven gateway, Chelmsford and West Essex is outweighed by the concentration of sites within this stretch of the A120 between Braintree and Colchester.  In addition to this, the Highways Agency needs demonstration that the A120 trunk road can continue to operate safely and efficiently.
A11 Tile Kiln, Valley Farm, Sible Hedingham	Significant negative impact on landscape that is not capable of mitigation
A12 Colchester Quarry - Bellhouse Farm South, Stanway	Significant negative impact on landscape that is not capable of mitigation
A14 Fingringhoe Quarry, Ballast Quay, Fingringhoe	Significant negative impact on landscape assessed in the Pre-Submission re-appraisal that is not capable of mitigation. There is also likely to be a high adverse visual impact for a number of receptors.
A15 Admirals Farm, Great Bentley	There is a concentration of sites within the Haven Gateway and other sites are closer to Colchester, a centre for growth. In addition to this, 20% of the site is within 250m of the Great Bentley defined settlement boundary, including a Conservation Area, which would not be suitable for low level restoration.
A16 Church Farm, Alresford	Site would require the continued use of Keelers Lane which is approximately 5.2 metres wide. This is insufficient width to accommodate a regular two way flow of HGV traffic and there is evidence of verge/carriageway edge damage and erosion evident on site. Proximity to settlements.

A17 Frating Hall Farm, Frating	There is a concentration of sites within the Haven Gateway and other sites are closer to Colchester, a centre for growth. In addition to this, infilling would be needed to protect a Listed Building, meaning the site is not suitable for low level restoration.
A18 Gurnhams, Little Bentley	There is a concentration of sites within the Haven Gateway and other sites are closer to Colchester, a centre for growth. In addition to this, infilling would be needed to protect a Listed Building, meaning the site is not suitable for low level restoration.
A19 Lodge Farm, Alresford	Significant negative impact on landscape that is not capable of mitigation. In addition to this the site would be contrary to transport policy.
A21 Thorrington Hall Farm, Thorrington	There would also be an unacceptable adverse impact on international or national historic environment designation. There is also likely to be a high adverse to major adverse visual impact for a large number of receptors.
A28 Fingringhoe Quarry – North, Colchester	Infilling would be needed to protect village setting which is not compatible with low level restoration.
A29 Fingringhoe Quarry – West, Colchester	Significant negative impact on landscape that is not capable of mitigation
A30 Fingringhoe Quarry – South, Colchester	Significant negative impact on landscape that is not capable of mitigation
A34 Thorrington Hall Farm	There is a concentration of sites within the Haven Gateway and other sites are closer to Colchester, a centre for growth. In addition to this, 10% of the site is within 250m of the Thorrington defined settlement boundary.
A42 Ardleigh Rail, Ardleigh	The site is contrary to transport policy, and concerns surrounding the access arrangements on Slough Lane. There would also be an unacceptable adverse impact on a Scheduled Monument designation. In addition to this there would be a highly adverse visual impact upon many receptors.
A43 Parkgate Farm, Silver End	The operators of Bradwell Quarry are not willing for the site to be an extension at this time. In addition, there is no agreement for the Promoter of the site to utilise the access of the existing Bradwell Quarry to the A12. The site would also have a highly adverse visual impact upon many receptors, and a number of properties are within 100m of the indicative extraction area.
A45 Ardleigh Rail 2	The site is contrary to transport policy, and concerns surrounding the access arrangements on Slough Lane. There would also be a highly adverse visual impact upon many receptors.

A24 Easton Park, Great Dunmow	Site has since gained planning permission and is no longer part of the site allocation process.
A35 Tyndales Farm, Danbury	A large amount of properties lie within 250m of the site and it is not considered that this visual impact could be satisfactorily mitigated in keeping with the landscape quality.
A36 Olivers Nurseries, Witham	Significant negative impact in that the site is unable to achieve satisfactory highway access.
A37 Alsteads Farm, Little Waltham	Significant negative impact on landscape that is not capable of mitigation.
A44 Whitehouse Farm, Woodham Walter	Significant negative impact on landscape that is not capable of mitigation.
A25 Elsenham Quarry, Elsenham	Significant negative impact on landscape that is not capable of mitigation.
A26 Frogs Hall Farm, Takeley	Significant negative impact in that the site is unable to achieve satisfactory highway access.
A27 Land at Ugley, Ugley	The site would potentially require significant infilling (est>500,000t) to achieve satisfactory restoration.
A33 Armigers Farm, Thaxted	Significant negative impact in that the site is unable to achieve satisfactory highway access.
A41 Patch Park Farm, Abridge	Significant negative impact on landscape that is not capable of mitigation. There would also be a highly adverse visual impact on a number of receptors located on the same level as the site and a highly adverse visual impact on a number of receptors on higher land.
<b>Industrial Minerals</b>	
B2 Slough Farm, Ardleigh Area 2	Now has planning permission (ESS/18/07/TEN).
B3 Park Farm, Ardleigh Area 3	There is a current lack of control over the site and an inability to work the within the plan period.
C2 Bulmer Brickfields, Bulmer	Extraction would not commence until after extraction from the existing permitted area and all necessary restoration phases have been completed.
<b>Transshipment Sites</b>	
D3 Sadds Wharf, Maldon	The site has seen a recent outline planning permission which was allowed on appeal for a mixed use development comprising 93 residential, office and leisure accommodation. As such, use of the site for a transshipment facility is considered to be undeliverable.

D5 Brightlingsea Quarry, Tendring	Significant negative impacts on biodiversity and landscape where the site cuts across the edge of a SSSI and an SPA. Further, proposals for new extraction sites at Thorrington (A21 and A34) are not Preferred Sites and as such the facility is unlikely to be deliverable.
D6 Ardleigh Rail Sidings	<p>It is considered that it is not possible to safeguard this site for use as a transshipment site due to potentially significant impacts on proximity to sensitive uses and access that it was assessed could not be mitigated.</p> <p>In addition to this, the site is located immediately to the north of a large multi-period crop mark complex, one of the largest in Essex, which is designated as a scheduled monument.</p>

**Table 6: The reasons for choosing the Minerals Local Plan as adopted in light of other reasonable alternatives: Selection Methodology of Reserve Sites**

Alternative explored in plan-making process	Reason for non-progression
Alternative 1 – To select sites that least conform to a principle of spatial distribution only as 'Reserve Sites.' (Main Modifications stage).	This alternative was rejected as the approach does not factor in the estimated yield of sites and their ability to contribute to the mtpa requirement. Where sites are concentrated to the east of the County, it would be difficult to select 'Reserve Sites' based on distribution alone.
Alternative 2 – To select those sites that had the most negative sustainability impacts (as evidenced in the Sustainability Appraisal) only as 'Reserve Sites' (Main Modifications stage).	This alternative was not progressed as sites, where considered to be environmentally and socially acceptable, should conform to the Spatial Strategy. Without which, the plan may not provide for mineral extraction distributed as evenly as possible across the plan area. Also, the local annual supply requirement may not be met where 'Reserve' and 'Preferred' sites are purely selected based on their environmental and social performance and not on their ability to best contribute to the supply of sand and gravel.
Alternative 3 – To select those sites that the (short term) omission of which closest represents the over-supply (in million tonnes [MT]), as evidenced by the rolling ten year sales average, as 'Reserve Sites' (Main Modifications stage).	This alternative was rejected where the selection of sites does not directly conform to the Spatial Strategy, and therefore the plan may not be as responsive to future growth across the County than a provision for mineral extraction distributed as evenly as possible across the plan area.

**Table 7: The reasons for choosing the Minerals Local Plan as adopted in light of other reasonable alternatives: Development Management Policy**

Policy	Alternative explored in plan-making process	Reason for non-progression
DM1 Development Management	Option 1 - To adopt appropriate criteria for borrow pits, agricultural reservoirs and prior extraction to	This option was rejected due to the criteria based approach weakening the general presumption against non-preferred sites and

SA/SEA Adoption Statement July 2014

Criteria	allow assessment of future sites for minerals extraction and processing.	certainty for plan users, and a difficulty to plan for and rely upon (in terms of contributions to) the apportionment of sand and gravel.
DM2 Planning Conditions and Legal Agreements	No alternatives were considered reasonable or deliverable.	N/A
DM3 Primary Processing Plant	Option 1 - To allow for the importation of a small proportion of non-indigenous materials.	This option was not progressed as the general presumption should be against importation. Restricting importation gives clarity to the working programme, life of quarry, and vehicle movements.
DM4 Secondary Processing Plant	Option 1 - Rather than differentiating between what secondary processing facilities are strategic - safeguard all known secondary processing facilities on a site by site basis.	This option was rejected where sites at quarries exist by virtue of the temporary mineral permission utilising the mineral at the site. For facilities associated with secondary processing to extend after the expiry of the time mineral planning permission would effectively retain incongruous industrial developments in the countryside, and extend the length of impacts on local communities and potentially conflict with a site's restoration scheme.

## 6 The measures decided concerning the monitoring of the Essex Minerals Local Plan 2014

The significant sustainability impacts of implementing a Local Plan must be monitored in order to identify unforeseen adverse effects and to be able to undertake appropriate remedial action. Monitoring is intended to provide important feedback on the success of the plan and progress towards its objectives. It can additionally be used to compile baseline information for future revisions of the plan.

Monitoring should be based on relevant objectives, indicators and targets. Some of these may be related to the sustainability objectives of the plan itself, or developed from the earlier stages of the sustainability appraisal. However, additional objectives, targets and indicators may also be required. The appropriate level at which to monitor will depend on the type and scale of the plan.

The key indicators to monitor as identified through the sustainability appraisal process are identified in the following table alongside each element or policy of the Essex Minerals Local Plan 2014 from which sustainability impacts may occur. The monitoring framework in the Minerals Local Plan identifies a current list of indicators that the MPA have identified for monitoring. It is acknowledged that the following indicators may not all be collectable due to limited resources and difficulty in data availability or collection.

**Table 8: The measures decided concerning the monitoring of the Minerals Local Plan**

Relevant policy	Indicator
The Vision	Tonnage recycled / Tonnage landfilled / Tonnage imported / Number of vehicle movements generated by site operation / Tonnage transported by means other than road / Amount of recycled material utilised / Number of permissions with an associated site restoration plan / State of the site prior and post extraction / Complaints regarding dust (Environmental Health and ECC) / Complaints regarding noise (Environmental Health and ECC) / Conditions to planning applications regarding hours of operation, emission/release parameters, and transport agreements etc / Traffic volumes in key locations.
Aims and Strategic Objectives	Tonnage recycled / Tonnage landfilled / Tonnage imported / Number of vehicle movements generated by operation / Tonnage transported by means other than road / Number of representations made to consultation of policy documents and individual planning applications / Capacity of secondary processing / recycling facilities / Amount of recycled material utilised / Number of permissions with an associated site restoration plan / State of the site prior and post extraction / Complaints regarding dust (Environmental Health and ECC) / Complaints regarding noise (Environmental Health and ECC) / Conditions to planning applications regarding hours of operation, emission/release parameters, and transport agreements etc / Traffic volumes in key locations / Location of Strategic Lorry Routes.
Policy S1 Presumption in Favour of Sustainable Development	N/A
The Strategy and Policy S2 Strategic Priorities for Minerals Development	Tonnage recycled / Tonnage landfilled / Tonnage imported / Location of rail links / Number of vehicle movements generated by site operation / Congestion ratios of relevant routes / Tonnage transported by means other than road / Capacity of secondary processing / recycling facilities / Amount of recycled material utilised / Number of permissions with an associated site restoration plan / State of the site prior and post extraction / Number of vehicle movements generated by site operation / Tonnage transported by means other than road / Complaints

	regarding dust (Environmental Health and ECC) / Complaints regarding noise (Environmental Health and ECC) / Conditions to planning applications regarding hours of operation, emission/release parameters, and transport agreements etc / Traffic volumes in key locations.
Policy S3 Climate Change	Distance to 'Areas susceptible to surface water flooding' / Number of vehicle movements generated by site operation / Congestion ratios of relevant routes / State of the site prior and post extraction / Number of developments where a green travel plan is submitted as a condition of development / Control of emissions through the use of managed equipment and vehicles
Policy S4 Reducing the Use of Mineral Resources	Tonnage recycled / Tonnage landfilled / Is the proposed development intended to be located within landscapes with a high sensitivity / Capacity of secondary processing / recycling facilities / Amount of recycled material utilised.
Policy S5 Creating and Safeguarding a Network of Aggregate Recycling Facilities	Tonnage recycled / Tonnage landfilled / Capacity of secondary processing / recycling facilities / Amount of recycled material utilised.
Policy S6 Provision for Sand and Gravel Extraction	Tonnage recycled / Tonnage landfilled / Number of permissions with an associated site restoration plan / State of the site prior and post extraction / Complaints regarding dust (Environmental Health and ECC) / Complaints regarding noise (Environmental Health and ECC) / Conditions to planning applications regarding hours of operation, emission/release parameters, and transport agreements etc / Traffic volumes in key locations / Facilities within 100metres of residential areas / Residential developments within 100metres of sources of noise and vibration.
Policy S7 Provision for Industrial Minerals	Number of permissions with an associated site restoration plan / State of the site prior and post extraction / Complaints regarding dust (Environmental Health and ECC) / Complaints regarding noise (Environmental Health and ECC) / Conditions to planning applications regarding hours of operation, emission/release parameters, and transport agreements etc / Traffic volumes in key locations / Facilities within 100metres of residential areas / Residential developments within 100metres of sources of noise and vibration.
Policy S8 Safeguarding Mineral Resources and Mineral Reserves	Complaints regarding dust (Environmental Health and ECC) / Complaints regarding noise (Environmental Health and ECC) / Facilities within 100metres of residential areas / Residential developments be within 100metres of sources of noise and vibration.
Policy S9 Safeguarding Mineral Transshipment Sites and Secondary Processing Facilities	Tonnage transported by means other than road.
Policy S10 Protecting and Enhancing the Environment and Local Amenity	Where relevant, the condition of the nearest (SSSIs, Ancient and/or Species Rich Hedgerows, A Green Lane, Ancient Woodland, Cereal Field margins, Heathland, Old Orchards, Ramsar sites, SPAs, SACs, cSACs, LNRs, NNRs, LoWS) / Ecological status of rivers / Chemical status of rivers / Condition of water bodies (Water Framework Directive) / Where relevant, the condition of the nearest (including its setting): (World Heritage Site, Scheduled Monument, Listed Building, Conservation Area, Historic Park or Garden, Historic Battlefield,

	Historic Environment Record, Conservation Areas, Grade 1, 2 and 3 soils) / Complaints regarding dust (Environmental Health and ECC) / Complaints regarding noise (Environmental Health and ECC) / Residential developments within 100metres of sources of noise and vibration.
Policy S11 Access and Transport	Number of developments where a green travel plan is submitted as a condition of development / Number of vehicle movements generated by site operation / Congestion ratios of relevant routes / Tonnage transported by means other than road / Complaints regarding noise (Environmental Health and ECC) / Conditions to planning applications regarding hours of operation, emission/release parameters, and transport agreements etc / Traffic volumes in key locations / Location of Strategic Lorry Routes.
Policy S12 Mineral Site Restoration and After Use	Landscape sensitivity / Number of permissions with an associated site restoration plan / State of the site prior and post extraction.
The Minerals Provision Figure	Tonnage recycled / Tonnage landfilled / Number of permissions with an associated site restoration plan / State of the site prior and post extraction / Complaints regarding dust (Environmental Health and ECC) / Complaints regarding noise (Environmental Health and ECC) / Conditions to planning applications regarding hours of operation, emission/release parameters, and transport agreements etc / Traffic volumes in key locations / Facilities within 100metres of residential areas / Residential developments within 100metres of sources of noise and vibration.
Policy DM1 Development Management Criteria	The implementation of Policy DM1 will impact on all the environmental and social SA/SEA indicators as specified in the Sustainability Framework (Annex C), where the policy seeks to protect environmental and social indicators and receptors from the potential impacts from minerals development.
Policy DM2 Planning Conditions and Legal Agreements	N/A
Policy DM3 Primary Processing Plant	Capacity of secondary processing / recycling facilities / Amount of recycled material utilised / Number of vehicle movements generated by site operation / Congestion ratios of relevant routes / Complaints regarding dust (Environmental Health and ECC) / Complaints regarding noise (Environmental Health and ECC) / Conditions to planning applications regarding hours of operation, emission/release parameters, and transport agreements etc / Traffic volumes in key locations / Facilities within 100metres of residential areas / Residential developments within 100metres of sources of noise and vibration.
Policy DM4 Secondary Processing Plant	Capacity of secondary processing / recycling facilities / Amount of recycled material utilised / Number of vehicle movements generated by site operation / Congestion ratios of relevant routes / Complaints regarding dust (Environmental Health and ECC) / Complaints regarding noise (Environmental Health and ECC) / Conditions to planning applications regarding hours of operation, emission/release parameters, and transport agreements etc / Traffic volumes in key locations / Facilities within 100metres of residential areas / Residential developments within 100metres of sources of noise and vibration.
Policy IMR1 Monitoring and	It is uncertain what SA/SEA indicators the implementation of Policy

SA/SEA Adoption Statement July 2014

Review	IMR1 is most likely to impact on at this stage
--------	--

This information is issued by  
**Place Services Team at Essex County Council**

You can contact us in the following ways:

Visit our website: [www.placeservices.co.uk](http://www.placeservices.co.uk)

Be Email: [enquiries@placeservices.co.uk](mailto:enquiries@placeservices.co.uk)

By telephone: **03330136840**

By post:  
**Place Services, Essex County Council**  
**PO Box 11, County Hall, Chelmsford, Essex, CM1 1QH**

Read our online magazine at [essex.gov.uk/ew](http://essex.gov.uk/ew)

Follow us on  **Essex\_CC**

Find us on  [facebook.com/essexcountycouncil](https://facebook.com/essexcountycouncil)

The information in this document can be translated, and/  
or made available in alternative formats, on request.

Published July 2014