

# Rivenhall Parish Council

*SERVING THE COMMUNITY OF RIVENHALL IN THE BRAINTREE DISTRICT IN THE COUNTY OF ESSEX*

## **CLERK TO THE PARISH COUNCIL**

Mr Keith P. Taylor  
23 Mersey Road, WITHAM,  
Essex, CM8 1LL  
Tel: (01376) 516975  
Email: [parishclerk@rivenhallparishcouncil.net](mailto:parishclerk@rivenhallparishcouncil.net)  
Website: [www.rivenhallparishcouncil.net](http://www.rivenhallparishcouncil.net)

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Essex County Council  
Minerals & Waste Planning  
Environment Sustainability & Highways  
County Hall  
Chelmsford  
CM1 1QH

Dear Sir/Madam,

### **Essex County Council Minerals Development Document: Preferred Approach.**

Please find below the comments/observations made by Rivenhall Parish Council, relative to the above.

I would be grateful to receive your acknowledgement of the receipt of this document in due course, either by letter or email.

Yours sincerely,

Keith P. Taylor  
Clerk to the Council.

### **Comments:**

#### **Question 2 - Preferred Approach.**

NO.

The Preferred Approach is a hybrid of dispersal and extensions to existing sites. This is not a clear strategy and does not achieve "the best possible geographic dispersal of sites across the county".

The extensions and new sites in the Central Area are highly concentrated on and around Rivenhall Airfield. Braintree District Council (BDC) has evaluated the degree of this concentration as being "38% of the County's total supply of sand and gravel" in the Plan Period and that this is "clearly not a dispersed pattern".

A more reasonable distribution would be to apportion sites across the local authorities and geographical area of Essex. Whilst exactly proportional shares cannot be achieved due to the location of deposits, as a guide, the 12 authorities in Essex would each be allocated around 3.6 million tonnes (mt) as a share of the 42mt total required.

The 2 sites on Rivenhall Airfield A3 and A4 would together provide about 4mt, which is reasonable and they are genuine extensions to the existing Bradwell Quarry. Rivenhall Parish Council supports BDC's position that these 2 sites are acceptable but that all the other sites (A2, 6, 6, and 7) on Rivenhall Airfield should not be selected. The Parish Council agrees with the Preferred Approach regarding A8, A43 and A1 not being selected.

**Question 11 - Transportation.**

Yes.

But Rivenhall Airfield would be classed as in category 3 of the 4 described. It could have an increasingly long length of private haul road, crossing miles of countryside, cutting over Public Rights of Way. The existing road may need to be substantially extended. The connection would continue to be to the A120 at Bradwell, one of the most congested parts of the Essex primary road network. As stated in the ECC documents, the Highways Agency (HA) (2009) expressed concern about the proposed additional Airfield minerals sites with continued access on to the A120. Rivenhall Parish Council would have strong concerns about any displacement of site traffic on to local roads.

**Question 12 - Environmental and Health Criteria.**

Partly.

But there is conflict in the ECC Preferred Approach because the allocations for Rivenhall Airfield have been assessed with no apparent analysis of the cumulative impacts of so many sites being excavated in one area and for so long. The promoter of the Rivenhall Airfield sites states (when describing A6) that activity could last until the year 2034, which under ECC's own criteria should rule it out of the list of Preferred Sites.

The Rivenhall Airfield allocations have not been assessed with reference to the documented wildlife studies conducted in connection with the "eRCF" waste strategy Inquiry and previous applications.

**Question 4 - Phasing.**

Yes.

But the concentration of sites at Rivenhall Airfield breaches the Preferred Approach which states that the "release of sites would occur in a co-ordinated manner across the county". If all the Airfield sites were worked, there would be 38% of the entire additional Essex extraction activity in this one area for (probably at least) another 23 years from now. Experience points to minerals sites often producing applications for time extensions, additional activities and changes to previously agreed restoration plans (as with both Bradwell Quarry and Witham Quarry).

**Question 17 - Site Selection Methodology.**

No.

There has been a failure to assess the cumulative impacts of the concentration of sites at Rivenhall Airfield. A full assessment should cover the length of operations, the large area covered (over 200 hectares), the proximity and length of operation impacts on documented wildlife and heritage interests (especially Storey's Wood - an ancient woodland and County Wildlife Site), the impacts on Silver End, the cumulative impacts on Public Rights of Way (there are a large number of these), cumulative impacts on noise, dust and light pollution and all other cumulative impacts.

Table 8 (site scoring) shows that A5, A6 and A7 were all selected only on a marginal basis using the adopted system. Two other sites also scored 41 points but were not selected. Why were the 3 sites at Rivenhall Airfield all selected above the 2 others also on 41 points?

#### **Question 18 - Distribution.**

No.

There is a high concentration of sites on and around Rivenhall Airfield and it is factually inaccurate to describe all the sites A2 to A7 as "extensions to Bradwell Quarry".

A3 and A4 are accepted as being extensions, but the others are not.

If the whole Rivenhall Airfield and surrounding area site allocations were worked, the combined area would be so large, it would intrude into 4 Parishes - Bradwell, Silver End, Kelvedon and Coggeshall.

#### **Question 19 - Specific Sites.**

In the comments below on Rivenhall Airfield and surrounding areas are grouped together.

A). Sites A3 and A4.

B). Yes. These are acceptable as extensions to the existing quarry and by providing 4mt, make a reasonable contribution to the ECC requirement.

A). Sites A2, A5, A6 and A7.

B). No.

C). N/A.

D). (mostly referring to Appendix H assessments).

The site promoter states that activity on part of the site could extend to 2034, well beyond the Plan period of 2028. Under ECC's own criteria, this site should not be allowed into the Preferred Sites list.

In the SA/SEA, at 7.7.2, table 11, sites A7 and A5 are described as extensions to Bradwell Quarry. Clearly they are not, and A6 is only marginally connected.

The general description of Rivenhall Airfield used by ECC as "industrial, not untouched or beautiful" is wrong and strongly contested by the local communities that value it. There are large areas of the proposed sites, which are open countryside, and include high quality landscape

within the Essex context, i.e. gently rolling countryside with pockets of ancient woodland. The area contains a number of listed buildings and offers habitats to a strong population of wildlife, particularly birds. The footpaths, bridleways, lanes and open areas on and around the airfield are very popular with local people, including Rivenhall residents, for walking, cycling, flying kites and model aircraft, spotting wildlife and generally enjoying the peaceful, "big skies" nature of the area. Rivenhall Airfield also has strong historic interest for many local people. All of this would be severely damaged by industrial activity on the scale proposed.

The County Council has failed to assess the evidence on wildlife that was presented to the "eRCF" waste site Inquiry. The assessments used by ECC refer to the "potential" for protected species, yet the Inquiry heard clear evidence of Protected Species - as well as BAP species.

There is concern that due to the combination of minerals sites and potentially one of the largest waste sites in Europe, local roads could at times have to take site traffic. All of the activities are currently proposed to use the private haul road on to the A120. The combined permitted HGV movements of minerals and waste (404 per day) could be up to around 700 HGVs per day. The A120 is heavily congested at peak times and suffers frequent blockages due to crashes. In its most recent comment (2009) on the proposed minerals sites at Rivenhall Airfield, the Highways Agency has expressed significant concern about access to the A120.

Displacement of HGV traffic on to local roads would have a highly negative impact on communities. Minerals traffic displaced on to local roads through Rivenhall would use Park Road, Church Road (past school, church, shop and village hall) and then either Rickstones Road or Oak Road. The waste site application proposed an "emergency access" using Woodhouse Lane and then on to the Kelvedon Road, which joins to Park Road.

The County Council has failed to properly assess the cumulative impacts on Public Rights of Way. There are numerous footpaths and bridleways,, some of which are ancient lanes, documented in the site assessments. The Essex Way would be affected. Rivenhall and Silver End have a strong community interest in the use and good maintenance of local Public Rights of Way.

The site promoters have mentioned a connection between the Rivenhall Airfield sites and a route for a major new road (the A120). This would be an inappropriate assessment to include as the former suggested route by the Highways Agency has no formal status and resulted in strong objections from local parishes and community groups.

#### **Question 20 - Other Sites.**

A). A8 and A43.

B). Yes.

C). We agree that these 2 sites should not be selected. They would be even more remote from Bradwell Quarry than A7, and would present significant impacts in terms of transportation of materials, landscape impacts and harm to local communities and wildlife. A43 would be a huge site, located partly along the boundary of Rivenhall Parish.

A). A1.

B). Yes.

C). We would agree that this site at Coleman's Farm, wholly within Rivenhall Parish, should not be selected. Rivenhall Parish Council has consistently objected to this site. We would also point out that the assessment is wrong in a number of matters.

Firstly, the site is wholly in Rivenhall Parish, not Witham as stated in the description.

Secondly, the assessments appear to have overlooked the existence of the Matchyns employment site at Rivenhall End.

Thirdly, we would strongly dispute that Little Braxted Lane is a suitable access for a major minerals extraction operation. It is in many sections a single track road with high hedges and bends, with local concealed accesses. The Colemans Bridge junction at the A12, which is also within Rivenhall Parish, can be heavily congested at peak times. Any suggestion of ore HGVs using the Rivenhall End junctions would be strongly resisted by the local community and the Parish Council. The Parish Council has been in discussion for many years with the Highways Agency about closing off the Oak Road A12 junction to HGVs due to the impact large vehicles are having on local residents.