

# ROXWELL PARISH COUNCIL

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28<sup>th</sup> October 2009.

Minerals and Waste Planning  
Environment, Sustainability and Highways  
Essex County Council  
Freepost CL 3636  
E3 County Hall  
Chelmsford  
CM1 1QH

Dear Sirs,

**Minerals Development Document-Site Allocations –Issues and option paper-August 2009.**

**Ref Site A40- Shellow Cross Farm –Elms farm and Newland Hall.**

Roxwell has for many years experienced gravel extraction, many smaller sites have already been extracted and re-instated back to agriculture and fishing lakes. The one exception being the Boyton Hall/Chignal site which still continues to operate some 60 years or more, after being subject to numerous extension requests. The news of the above proposal which is a site situated less than 2 miles from the existing Roxwell site galvanised the Parishioners to voice their concerns and objections very strongly at a recent meeting of the Roxwell Parish Council at which the Councillors agreed unanimously that they supported their concerns and as a result the following list of objections is put forward.

## **Access and Transportation**

The proposed access to the site off the A1060 between the entrance to Newland Hall and turning to Good Easter at Chalk End is situated between two fast sweeping bends on both the Eastern and Western approaches, the amount of vehicle movements that will be generated by slow moving traffic both on and off the site could well see this stretch of road become an accident blackspot.

It should be noted that Essex County Council have made strong objections over the years to several planning applications along the A1060 within the Parish Boundary due to their concerns about the speed of vehicles.

Motorists have suffered also over the years, with many cracked windscreens and headlamps, plus body damage. Rubbish has also been a problem over the years with much paper and plastic being dropped from vehicles transporting infill to the site.

LaFarge have confirmed that all transportation is by road and that they do not use the Chelmsford rail head.

Access cannot be obtained as the proposed road indicated crosses privately owned land with no access or right to purchase.

### **Biodiversity and Wildlife**

The area at present is home to a very diverse range of wildlife, fauna and flora. This all readily accessible to locals and walkers who regularly use the network of footpaths.

The wildlife relies on the natural cover and protection from the various areas of woodland that are situated close to the proposed area. The woodland close to Shellow Cross Farm, although the proposal states this will not be disturbed, will be completely surrounded and this proposal will impact on the species that are currently in residence.

There is an area of mature woodland close to the A1060 which the proposal shows the entrance route to the northern section of the site going straight through the middle, this must not be allowed at any cost.

Amongst the wildlife that can regularly be seen in the area are Fallow deer which have for many years used it as part of their migration across the county.

Other species that have their habitat in the area are:- Red Foxes-Rabbits-Brown Hares-Badgers (there are many known sets on the proposed site).-Moles-Hedgehogs-Shrews-Stoats-Weasels- Bats (the protection of which is well documented under the Wildlife and Countryside Act of 1981 and subsequent amendments, as well as the European Unions Council Directive of 1992).

At various times of the year the following birds can be seen:- The Common Buzzard-Red Kites-Kestrel-Sparrow Hawks-Snipe -Woodcock-Owls- Green and Spotted Woodpeckers -plus all the regular species that are more easily recognisable.

There are also numerous insects and amphibians that can be found throughout the proposed site.

Wildlife has no answer to this development so it is up to us to protect their rights.

### **Protection of the Countryside**

The proposed area lies within the Metropolitan Green Belt and is also close to the Roxwell and Roding Valley Conservation areas

It is of great importance to keep the Green Belt in its present state. Chelmsford Borough Council have stated it should be safeguarded in the South and Southwest of the Borough. Options for releasing Green Belt land for housing have been rejected by Chelmsford Borough Council. It is also part of its spatial strategy that Green Belt should be protected up to and beyond 2012. The Epping Forest District Council have similar policies in place.

The size and scale of this proposal will have a detrimental impact on the landscape which will lose its present openness, and character.

### **Impact on the local amenity-noise-dust etc.**

At present the land on which the proposed site is a tranquil area which is only disturbed by the land owners going about their normal farming activities.

Dust, noise and vibrations would be additional conditions that would have to be tolerated

### **Carbon Footprint**

The proposed extraction tonnage of 4.95 million tonnes and the later infill will mean material movements of approx 10 million tonnes.

The proposed site haul road, which will be around 1km in length will be a major source for the size of the carbon footprint.

Using figures sourced from DEFRA the total amount of carbon dioxide that could be generated by the vehicle trips along this internal road would be well over 800 tonnes, over 1 tonne of methane, and almost 9 tonnes of nitrous oxide during the expected life of the site.

Other pollution will be in the form of aldehydes, polycyclic hydrocarbons and sulphur dioxide from the diesel vehicles and plant. These pollutants will disperse into what is at present a clean rural environment.

The Chelmsford Borough Council Policy CP11 states that 'The Borough Council expect development to have a net beneficial effect on the local and global environment. This proposal will provide no net benefit to the local and global environment.

If work continued on all of all the existing sites in the document, between them they would supply the required amount of minerals in the life span of the plan. This would keep the carbon footprint generated in Essex down as a result of not having to construct service roads and new processing plant on new sites such as this.

### **Public Rights of Way**

Bridleways and footpaths run through the middle of the proposed site and will be lost to the local community and visitors if the proposal goes ahead. These connect up to many other bridleways and footpaths outside the area, including the Essex Way. Many of the footpaths have been in existence for hundreds of years, and many have hedgerows and ditches running alongside which will have been there since the introduction of early field enclosures.

### **Health and Safety**

The increase in the volume of traffic on the A1060 and surrounding roads will greatly increase the possibility of accidents and also generate pollution.

There was much concern shown about the health hazards from dust and gravel extraction, especially as children today suffer from asthma at a higher level than earlier generations. The families who this may affect feel it is not a theoretical risk but a major concern.

Site security could be difficult especially with the amount of footpaths and roads that border the site, and as the site is close to our village of Roxwell children will keen to investigate what is going on. Water would be a significant hazard during a long hot summer.

### **Loss of Agriculture Production**

The loss of the land, which is agriculture grade 1 for 23 to 30 years would result in a huge reduction of the crops grown on the normal farming rotation cycle. The UK Energy Regulator has warned that the long term loss of agriculture production limits choices for Essex and the East of England. Wheat, apart from being a source for the food chain, is an important source of fuel, Bio Ethanol, which on a site this size could be in the region of 6 million litres.

In August 2009 Defra Secretary of State Hilary Benn announced the first assessment of the UK's food security. This document highlights that the sustainability of the UK's food supply is a major challenge for the future of the UK. The loss of highly productive agriculture land appears to be contrary to Policy MLP8 of the Essex Minerals Local Plan.

### **Water environment and Hydrology**

This is an area of great concern with this proposed site.

The part nearest Shellow Cross Farm drains into the Thames catchment.

The part around Elms farm and Newland Hall drains to the Blackwater catchment.

Roxwell is named after the number of springs that flow through the parish.

The gravel that it is proposed to extract is the aquifer that feeds all the streams and springs so that they continue to flow. The removal and backfilling of the site with inert material will have the effect of stopping the flow to some of these streams and springs.

Before any form of approval could be given the developer would need to commission an extensive hydrogeological survey and monitoring over an extended period.

There is no way of knowing what the impact of the loss of the aquifer to the flows in Newland Brook, the effect on the Newland fisheries, the impact on wells used for drinking or other purpose by properties along the Newland Brook valley, the frequency of flooding at Boyton Cross, the dilution of the Roxwell sewage works discharge and degradation in quality of the Roxwell Brook.

If part of the aquifer flows to Roxwell Brook via Skreens lake, any resultant diminishing of the flow would lead to stagnation and the death of many fish and other species that rely on the flow.

There are so many unknown factors in this area that make the proposal unworkable.

### **Need for Gravel Extraction**

At present the stockpile of sand and gravel stands at around 12 million tonnes, the recommended stockpile is 7 million tonnes.

With the economy still struggling and likely to be for several years yet, despite what the so called experts are predicting, can it really be necessary to excavate 39 million tonnes in the period up to 2026, or more, as the time scale of the document is way behind schedule.

### **Restoration of Site**

There can be no guarantee that after a lengthy period of extraction that restoration of the site would return it to its present condition which is of paramount importance to maintain the wonderful Essex countryside we should all be protecting.

### **Other**

Skreens Park Scout Camp site is close by and the noise and dust will affect those using the facilities.

More importantly is the fact that many Chief Scout and Duke of Edinburgh award expeditions use the network of footpaths on their approach. The young people who visit this site would be mortified at the impact on the environment this proposal would have.

The Chelmsford Borough Council and Epping Forest District Council both have policies in place that show that this proposal is contrary to many of them.

The developers and land owners are showing nothing but , contempt to the local residents, and greed in putting forward and agreeing to this proposal.

In closing it should be said that this proposal can be seen as nothing more than rape and pillage of the land. Therefore the proposal for site A40 should be removed as there are more suitable sites within the documents that will attain the targets that are required.

For and on behalf of Roxwell Parish Council.

C.Pavitt  
Chairman



