

Executive Summary

Essex County Council (ECC) Mineral Development Document Preferred Approach Paper (MDDPAP) published in December 2010 has a direct impact on the parish of Roxwell. Roxwell Parish Council has been invited to respond to this document as part of the consultation. The site specifically affects this community is A40. The response looks at the intelligence used to support the Spatial Strategy, its approach, specific details, the argument and creditability placed forward. Roxwell Parish Council scrutinised the information documented in MDDPAP inline with current information. The factual information used by Roxwell Parish Council is open sourced, has been obtained either directly from ECC officers, ECC website or published by central government. This paper is broken down into four main sections:

1. The Need for Sand and Gravel

- A review of current mineral and planning legislation, policies and guidance from central government
- Securitisations of the factual intelligence that supports apportionment used, how that information is used to provide a sound and justify strategic case for the call for sites

2. The need to understand community feedback

- A local perception on the interaction between the community and ECC
- How the residents' views and comments have been handled and their belief in the process.

3. Essex county council spatial strategy

- A review of the Spatial Strategy, the information intelligence used to support its arguments and golden thread through the paper
- The use of spatial intelligence to support this strategic view

4. Essex County Council use of Methodology for Site Selection

- Scrutinises the methodology

Key findings

The Need for Sand and Gravel

There is currently a major change been driven forward by central government that applies to significant polices and guidance used to direct and influence the way minerals are obtained and the justification. Within the new guidance, there is clear direction how apportionment should be calculated.

Key policies guidance

- PPS12 states: to be “sound” a core strategy should be JUSTIFIED, EFFECTIVE and consistent with NATIONAL POLICY.
- “Justified” means that the document must be:
 - founded on a **robust and credible evidence base**
 - the most appropriate strategy when considered against the reasonable alternatives

- NRGAPE states: Must select the previous 10 years of sales to define apportionment
- Guidance only extends the current time to 2020
- Current mineral policy is in a high degree of change, future need not clear.

Sales and Growth

- Over a fifteen year period, sales have had a steady negative decline.
- Economic growth has had a positive increase over the same period.

Apportionment

- Apportionment at 4.31mtpa is not supported by ECC published figures with the AMR
- Apportionment based on current guidelines (10 year rule) and ECCAMR figures is 3.891mtspa

Windfall Sites

- Windfall has had a positive increase over a thirty one year period.
- Windfall Sites will contribute to the future provision as the policy is to avoid mineral sterilisation.
- Over the last 31 years, windfall has contribute 0.535mts pa (average)

Future Provision

- Future provision start date 2009
- Future provision should not exceed 2020
- 14 years future provision complies with credible timeframes, allows for a 2 years for tolerance.
- PPS12 policy recommends a 5-7 year review
- **Future Provision is 0.94mts not 42.225mts**

The need to understand community feedback

- Local perceptions that the interaction between the community and ECC does not meet the expectations of people trying to reach out and ensure their voices are heard.
- There was an overwhelming response to the initial inclusion of A40, yet the residents' views and comments appear to have been dismissed.

Essex county council spatial strategy

Spatial Strategy

- Current national guidance is only aimed at maintaining the 7 year land bank
- Using the correct apportionment figure, Landbank provides 7 years towards the future provision.
- Future reserves provide a further 2.5 years towards the future provision.
- New permissions granted already provide 2.25 years towards the future provision.
- There is no golden thread that follows through the strategy.
- The Spatial Strategy does not apply to 84.5% of current future provision.
- The Spatial Strategy only focuses on 15.5% of future provision.
- **Future Provision managed through this strategy accounts towards 3.86% or 7 months**

Spatial Intelligence

- There is no document to define the 3 geographical areas used to analyse site location.
- There are clear defined district geographical already used by ECC to define areas.

- There has been no spatial intelligence applied to identify the best methodology for each site to serve development in the west.

Essex County Council use of Methodology for Site Selection

Site Methodology - A40

- There is no evidence base to discriminate Site A40 with an additional 6 point weighting.
- Placing an additional weighting on Site A40 undermines the whole RAG methodology.
- **Additional 6 point placement eliminates all the “Amber3:” that have been classed by ECC as important and have “Major Issues”**
- The methodology has a significant thread of subjectivity between sites and categories that renders the summary invalid.

In conclusion, the Parish of Roxwell does not support this Spatial Strategy, the inclusion of Site A 40 into this stage and totally rejects the need for inclusion to the next stage following this consultation. Furthermore, if the need arises, the Parish Council is willing to present and demonstrate through detailed evidence that Site A40 is completely unjustified for mineral extraction; the very high impact to the local area, its people and their businesses.