



## HUNSDON PARISH COUNCIL

### HERTFORDSHIRE DRAFT MINERALS AND WASTE LOCAL PLAN 2040.

#### RESPONSE TO REGULATION 18 CONSULTATION

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#### PRINCIPAL OBJECTIONS

##### A) Policy 2 - Meeting Sand and Gravel Needs

Under this policy The Briggens Estate (Olives Farm Hunsdon) is designated as a **Minerals Allocation Site (MAS01)** with 5 Site Specific Requirements (SSR). *Planning permission will be granted in principle for sand and gravel extraction at an MAS under this Policy.*

- 1) Failure to supply sand and gravel for construction purposes in Hertfordshire: -
  - i) Restricted access as required by the SRR limits transport to and from the east on the A414 without access to and from west.
  - ii) Opening up west facing slip roads at Netherfield Lane identified as mitigation in the Site Brief is not a specific requirement and therefore cannot be guaranteed. Ownership or rights over the land required for connecting roads would have to be acquired. This proposal will be expensive and impinge on the economic viability of the Site.
  - iii) The absence of west facing slip accesses between the B181 and A414 leads to the potential for more circuitous routes for destinations to the west. This leads to pressure to open access onto the B180 to proceed via Hunsdon to the A414 (which would be a very harmful threat to Hunsdon and the local community and would attract very strong opposition) and/or inappropriate and potentially unsafe U-turn manoeuvres (already favoured by the promoters of the Briggens Site) to be made by 20 HGVs per hour at junctions on the A414. These are serious considerations which have not been addressed, particularly in the light of the changes which are proposed to those junctions as part of the Gilston Development. Assurances should be sought from both Hertfordshire County Council, who are the lead local highway authority and Highways England that access and highway safety and traffic congestion, of both local and national important highways, will be closely considered and that the highway authorities are satisfied that no detrimental impact will occur in respect to highway safety as a result of the proposal.
  - iv) There is no evidence presented to support the view that supplying minerals to the adjacent Gilston Area housing development is a viable proposition as the nearest in Village 7 will be completed, if it obtains planning permission, before the extraction can commence. Consequently, there are unlikely to be synergies between the potential operators of Briggens and the developers of the GA for



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the supply of minerals. If village 7 is so completed, it seems contrary to commercial sense that the owners, Taylor Wimpey will allow a conveyor belt haul across their land to connect with developments at Gilston.

Our information is that there have been no discussions between the promoters of the Briggens Site and the developer/owners of any of the Gilston Villages to give credence to the assertion in Appendix 1 Site Brief that “The policy aims to supply 10,000 dwellings as a new garden village, with 7,000 of the homes likely to be developed after the end of the plan period of the East Herts District Plan”.

- 2) Policy 2 contravenes NPPF Paragraph 148 – substantial weight must be given to any harm in the Green Belt which has to be clearly outweighed by other considerations justifying ‘Very Special Circumstances’.

The Draft Plan does not stipulate that materials from the designated MAS’s have to be utilised within Hertfordshire and therefore any shortfall in supply will need to be met by imports into Hertfordshire. The Plan does not address this issue but it is assumed that such import operations would be sustainable. By tacitly, accepting a measure of imported supplies (which could be sustainably increased) there is therefore no need to quarry at Briggens and consequently the harm caused by extraction operations clearly outweighs any benefits to Hertfordshire. In short, there is no justification for the destruction of pleasant rolling open countryside of beneficial agricultural use around our villages for the sake of supplying minerals to Essex and beyond.

In this respect it is noted that the potential operators of the Briggens Estate MAS, Tarmac, manage the rail head at Harlow Mill which would provide a convenient, economic, terminus for onward transport of minerals and so avoid the need to provide western access into Hertfordshire.

### **B) High Environmental Impacts**

Briggens Estate MAS01 is located in Green Belt, Areas of Archaeological Significance are identified within it. It is bordered to the north by Newlands Meadow Wildlife Site, to the east by Lords Wood Ancient Woodland and Bury Plantation Wildlife Sites to the south by Stansteadbury Historic Park and Gardens and west by Stanstead Abbots Conservation Area and the Lee Valley Park. There are several bridleways through the area.

Olives Farm is a haven for numerous protected species including Great Crested Newts, Barn Owls, Tawny Owl, Barbastelle bats, Skylarks and nesting plovers (especially in the commons around the back of Cats Hill).

Additional designations exist within the wider area including: to the north Black Bushes, Newgate Wood, Moat Wood and Easneye Wood Wildlife Sites; to the east the Eastwick Mead Wildlife Sites and the Hunsdon Brook Fishpond Scheduled Ancient Monument; to the south the Briggens Estate Historic Park and Gardens, Hunsdon Mead SSSI and Rye Meads SSSI and Gravel Pit Wildlife Site and Ramsar Wetlands; to the west the



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settlement of Stanstead Abbots, Stanstead Abbots Wildlife Site and Amwell Quarry SSSI and Ramsar wetlands. The site also sits within the Impact Risk Zone of Lee Valley Special Protection Area.

The impact will be widespread and damaging to the local wildlife sites particularly Lords Wood Ancient Woodland, an irreplaceable habitat on the eastern boundary contrary to **Policy 15 – Biodiversity and Geodiversity**

Heritage assets in the locality include listed buildings at Olives Farm settlement, Bonningtons, St Dunstan's Church, Hunsdon House, Netherfield House settlement, Little Briggens settlement, Newlands, Netherfield Cottages, Briggens House, Stanstead Bury, Hunsdonbury. The close proximity and sensitivity of the settings of these listed buildings will be severely impacted by the quarry operations contrary to **Policy 18 – Historic Environment**

Most of the water from this site drains into the Rye Meads SSSI and therefore contamination from any quarrying activities has the potential to be highly damaging.

The site is located within close proximity to several dwellings including Hunsdon Road cottages, Olives Farm, and Cold Harbour Farm. Village 7 of the Gilston Area development comprising 1500 dwellings is due to be built adjacent to the eastern boundary of Briggens Estate Site. These new homes and future occupiers (over 3000) as well as existing residents in the neighbourhood, will be significantly impacted by the working of the quarry and associated industrial operations including ready mix concrete batching and aggregate crushing and sieving, through noise, dust, fumes, light pollution odour, visual impact and associated vehicle movements. The size of the quarry site would result in a prolonged period of harm to local residents for over a generation. This is totally contrary to **Policy 19 – Protection and Enhancement of Amenity and Policy 20 – Health and Wellbeing**.

The landscape will be unavoidably permanently altered and visually destructed by the extraction operations. This is unacceptable and contrary to **Policy 16 – Landscape and Green Infrastructure** and also contrary to **Policy HE3** of the Hunsdon Area Neighbourhood Plan – **Landscape Character and Cherished Views** which identifies attractive cherished views of the open countryside at Olives Farm and Lords Wood. Views 5 & 6 require the avoidance of visual encroachment and location of buildings in full view. No floodlighting is to be visible from these viewpoints. Because of the lie of the land, it will be impossible to avoid visual encroachment and comply with this policy.

The Site is traversed by Harcamlow Way an important regional route and another footpath which would have to be diverted around the perimeter drastically reducing the



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recreational enjoyment of these facilities. This is contrary to **Policy 25 – Public Rights of Way**

The openness of the countryside between Stanstead Abbots and Harlow, already compromised by the Gilston Area Development, will be destroyed by quarrying activities leading to coalescence of urbanisation between Harlow and the A10.

Those travelling along the A414 and B180 will see the scar of the quarry where there was once gently rolling attractive open countryside.

Green Belt policy, as set out in the NPPF paragraph 150, allows minerals development in the Green Belt providing the openness of the Green Belt is preserved. The minerals extraction operations over a period of probably 25 years will, by their very nature, adversely impact the openness of the area of Green Belt for that time. Restoration operations will take additional time. This is contrary to **Policy 14 – Green Belt** and **Policy 26 – Cumulative Impacts**.

### **C) Flaws in the Sand and Gravel Site Selection Process**

Twenty-four potential sand and gravel sites were assessed for the Reg 19 Minerals Local Plan approved by HCC Members but since withdrawn. The methodology comprised a 3-sieve process of assessment and ranking of the submitted Sites.

Optional strategies to meet the demand perceived at that time were drawn up. Sites were eliminated from the assessment process for a variety of reasons. Only MLPCS's 006, 008, 009, and 010 (Briggens Estate), remained as potential options for sand and gravel extraction. These Sites therefore were grouped to form Option 4 which was the only alternative considered viable recommended to the CC Members and approved in Panel Papers.

The evidence for the withdrawn plan however forms the basis for the Minerals Policies in the combined Draft Minerals and Waste Local Plan 2040. The Sites in Option 4, including Briggens Estate, have been redesignated as MAS's.

There are major problems with the process that led to this conclusion.

#### **Firstly: -**

Eleven of the Sites were eliminated for various operational reasons including 4 for high environmental impacts assessed under Sieve 3. However, another nine of the Sites were eliminated having a red score under Sieve 2 assessment because of a 'lack of information to conclusively determine economic viability and deliverability'.

**Lack of information may prevent realistic assessment but this deficiency is not a valid argument for omitting these Sites from the possible options at this stage.**



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**It is no more a valid argument for *omission* than for *inclusion* for the purposes of further investigation.**

**The lack of information can be remedied and the Sites re-assessed.**

This would enable 17 Sites to be re-assessed.

The onus is on HCC to identify the need for, and locations of, new Mineral sites through the Plan process. This relies on a robust process of gathering evidence, testing sites and setting out strong policy to support sites as they come forward. Unfortunately, HCC have fallen short in their duty, by relying on third party proposals for the Briggens site without themselves actively gathering evidence and testing other feasible sites in the County. For this reason, their work is flawed and the 17 sites should be re-assessed. So-called lack of information is not where their process should stop. It is their responsibility to obtain that information and gather the evidence and test the sites themselves and not rely on third parties with vested interests.

Only two of these Sites have more red flags than Briggens Estate and this Site therefore drops to 15<sup>th</sup> in this ranking. If Briggens were to be re-appraised as indicated below with 10 red flags then it would become the lowest ranked Site.

In addition, it can be argued that as the access SSR at Briggens restricts quarry vehicle movements to and from the east, the sand and gravel has no economic value for construction activities in Hertfordshire and therefore the Sieve 2 assessment should be scored as red. This too is a compelling argument for eliminating Briggens from the assessments.

***See Appendix A.***

### **Secondly**

The methodology comprises a 3-sieve process of assessment and ranking submitted Sites. Sieve 1 is a basic trawl of major constraints. Sieve 2 verifies evidence relating to commercial viability and deliverability. Sieve 3 is a traffic light score system of 22 environmental and planning constraints.

No Sites were eliminated from the assessment at Sieve 1 and Sieve 2 stages in LUC report.

Sites offered for consideration of minerals extraction were assessed in the LUC Report dated August 2018 using the 3 Sieve evaluation process. Of the 24 sand and gravel potential sites submitted, Briggens Estate (MLPCS010 – reference No. in the withdrawn plan) ranked 14<sup>th</sup> equal with two others. This is based on the potential impacts of the Site on its surrounding environment. Briggens had 6 red scores.

The consultants concluded that Sites with between 2 and 4 red scores were likely to have the greatest potential to mitigate their harmful impacts.

However, the assessment has overlooked key factors that change the scores significantly: -



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- a. The impact on Lords Wood a Local Wildlife Site should be 'High' to be consistent with other assessments in the report.
- b. The assessment has overlooked the impact of the quarry on the adjoining Village 7 of the Gilston Area. Over 3,000 inhabitants are severely impacted. The score should be 'High' or 'Very High'.
- c. The Hunsdon Area Neighbourhood Plan designates the landscape south of Olives Farm as a cherished view (Policy HE3) and the coalescence of development along the A414 would impact on the openness of the Green Belt. The score should be 'High'.
- d. The potential impact of traffic generated by the quarry on the village and residents of Hunsdon is 'Very High' and will raise a very high number of objections.

It can reasonably be argued that the number of red scores therefore should be increased to 10 which reflects the serious harm the quarry will do. Briggens Estate should therefore be reassessed to the **lowest priority of all the Sites in Sieve 3 assessment of the LUC Report and omitted from the process.**

### **D) Policy 10: Secondary and Recycled Materials**

The Plan proposes to meet minerals demand primarily through the designated sites. There is no allowance for recycled materials. This is a bad policy which denies incentives to sustainable construction. If nationally accepted figures of 28% were recognised by HCC, this it is said, would reduce the requirement for new supply sources down from 18.56MT to 10.86MT.

The virgin gravel and sand demand figures are therefore inflated (by possibly over 25%) which throws doubt on the justification for the MAS's identified in Policy 2 as other more suitable sites may consequently come forward as viable options individually or in combination and be able to meet the demand.

Further investigation needs to be undertaken to identify the quantity of aggregates that can be met through recycled materials and consequently a re-appraisal of the MAS options carried out.

Policy 10 should admit a 28% target of recycled materials to meet the aspirations of the Policy and support sustainability objectives of the Council and the Draft Plan.

### **E) Failure to Meet Minerals Plan Objectives**

The location and surrounding environment of MAS01 Briggens Estate presents serious problems as a potential site for minerals extraction as indicated in principle A-D above. Examining the brief for the site and assessing its impacts leads to the conclusions that its inclusion in Policy 2 fails to meet the Draft Plan's Objectives No's 1, 3, 5, 6, 7, 8 and 10. Further work is required to assess compliance with objective 9.



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### **Failed Objectives**

- 1: Supply of minerals
- 3: Use of recycled materials
- 5: Climate change resilience
- 6: Sustainable transport
- 7: Health and wellbeing
- 8: Built and Historic Environment
- 10: Local Economy

***See Appendix B***

### **F) Draft Plan Strategy - Sustainability**

The Draft Plan's strategy for minerals is set out in the Spatial Strategy for Minerals dated July 2022 - a key document supporting the Policies proposed in the Plan. The Strategy explains how the Sand and Gravel Annual provision Rate has been derived and this figure of 1.31 Mtpa consequently leads to a remaining requirement of virgin resources for the Plan period taking reserves into account (Policy 2 – Meeting Sand and Gravel Needs).

The NPPF paragraph 213 makes it clear that future demand forecasts should take into account "an assessment of all supply options (including marine dredged, secondary and recycled sources)".

These strategic issues need to be addressed in the Plan: -

1. The contribution of recycled materials to the supply. This is not quantified in the Plan either as an estimate or a target but needs to be assessed to arrive at a refined demand prediction in accordance with the NPPF.  
The Waste Local Plan Review in 2019 forecast an improving percentage of recycled construction and demolition waste which would reduce significantly, if not totally, the need for virgin minerals during the Plan period. The Waste and Minerals Policies need to be properly co-ordinated in the Draft Plan before conclusions can be reached regarding further minerals extraction in the County.
2. Alternative sources of supply from sustainable sources outside the County. A significant level of imported materials currently support demand in the County and this is foreseen to continue. Bulk imports could be via sustainable transport hubs identified in the Plan - e.g. rail at Rye House or from Harlow Mill or the River Stort (close to the Gilston Area development). Only exports are considered in the Plan. Imported alternative supplies need to be assessed in accordance with the NPPF.
3. Taking account of County initiatives securing the cessation of household waste to landfill, it seems perverse that a quarry at Olives Farm would need to be restored using inert waste from construction and demolition when this material could be



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recycled thus reducing the need for virgin materials in the first place. Again, the Waste and Minerals Policies need to be properly co-ordinated in the Draft Plan before conclusions can be reached regarding further minerals extraction in the County.

Without an assessment of these issues, it is not possible to conclude, as the Plan does that: -

- Extraction from Briggens Estate Site is more sustainable than increasing imports when balancing the environmental harm of these alternatives.
- Extraction from Briggens Estate Site is required to meet demand for virgin minerals.

The Draft Plan seeks to update and resume the 'status quo' in regard to the traditional minerals industry in the County. The policies are based on established practice which continues to exploit local reserves with no tangible recognition of the rapidly changing circumstances influencing the construction industry – particularly the drive towards kerbing Climate Change. The supporting information for the Plan comes from Minerals Industry and land-owning sources and needs to be viewed in that context.

Consideration of the overarching sustainability of the Plan is absent as there is no long-term strategic policy. The Draft Plan cannot therefore demonstrate that it is economically, environmentally and socially sustainable in the light of possibly more sustainable alternatives and therefore fails the basic concepts of the NPPF and its requirements.

### **G) Policy - 4 - Site Safeguarding and Consultation Areas**

The Draft Policies Map shows two Waste Management Sites within the Parish of Hunsdon.

#### **WMS 93 – Hunsdon Skip Hire**

This site has a certificate of permitted development and has been operating in excess of the licenced tonnages. The lorries associated with these operations are unsuitable on the narrow lanes around the village and represent a real danger to road users particularly pedestrians, equestrians and cyclists.

HCC have been reluctant to take any action to get the operators to conform to the permitted use. The Environment Agency has had to take enforcement action against the operators in recent times.

It is not in the community's overall interest to have the site safeguarded as alternative use of the land could be considered. The operations may serve a useful purpose regarding waste management but should be relocated to more suitable facilities.

The Policies Map is not of sufficient scale to show if the adjacent Wood Yard is included in the MAS. Its separate status and permitted use for business NOT waste should be made clear in the policy text.

The WMS should be removed from the Policies Map as safeguarded.





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### **WMS 110 – Hunsdon Airfield**

This WMS is located at Hunsdon Lodge on the disused airfield within the land designated under Policy GA1 of the Local Plan for community open space. The HGV's associated with operations represent a very real danger to highway users on Church Lane and Acorn Street. The continued use for waste processing is therefore totally unacceptable and WMS 110 should not be safeguarded and removed from the Policy Maps.



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### APPENDIX A

The table below lists all 24 sand and gravel sites assessed for the Reg 19 Minerals Local Plan approved by HCC Members but since withdrawn.

**Table A1**

Site ID	Site Name	Reason for Omission	Sieve 3 Red Flags	Comments
MLPCS001	Land at Cromer Hyde Farm	Sieve 2 red	5 – incl. 1 Very High	
MLPCS002	Land at Salisbury Hall	Likely significant public objections on highway grounds	5	
MLPCS003	Land at Ware Park	Unacceptable in planning terms	6	
MLPCS004	Land at Pynesfield	Permitted reserve	2	
MLPCS005	Nashe's and Fairfold's Farm	Withdrawn	4	
MLPCS006	Hatfield Aerodrome		5	
MLPCS007	Barwick	Sieve 2 red	8	
MLPCS008	Hatfield – Furze Field		3	
MLPCS009	Hatfield Quarry – Land adjoining Coopers Green Lane		5	
MLPCS010	The Briggens Estate		6	Under evaluated – 7 or more could be 10
MLPCS011	Water Hall Quarry – Farm Fields Area	Sieve 2 red	5	
MLPCS012	Water Hall Quarry – Broad Green Area	Planning consent problems	3	



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Site ID	Site Name	Reason for Omission	Sieve 3 Red Flags	Comments
MLPCS014	Water Hall Quarry – Bunkers Hill South Area	Sieve 2 red	5	
MLPCS015	Plashes Farm	Sieve 2 red – Very High	7 – incl. 2 Very High	
MLPCS016	Water Hall Quarry – Howe Green Area	Sieve 2 red	5	
MLPCS017	Robins Nest Hill	Sieve 2 red	2	
MLPCS018	Southfield Wood East	Sieve 2 red	4	
MLPCS019	Pipers End	Sieve 2 red	5	
	<b>Preferred Areas</b>			
1	Land close to the existing Hatfield Quarry Sand and Gravel	Bromate plume and economic viability	4	
2	Land to the north of the existing Rickneys Quarry	Site dormant	5 – incl. 1 Very High	
3	Land to the south-east of the existing Tyttenhanger Quarry	Worked out	NA	
	<b>Sites Submitted after Draft Minerals Local Plan consultation and assessed in 2018</b>			
MLPCS021	Land adjacent to Coursers Farm (North Mymms West)	Sieve 3 red flags and concerns over delivery and hazardous access	4 – incl. 1 Very High	
MLPCS022	Land adjacent to Coursers Farm (North Mymms East)	Sieve 3 red flags and concerns over delivery and hazardous access	4	
MLPCS023	Warren Farm	Concerns regarding deliverability	5	



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Site ID	Site Name	Reason for Omission	Sieve 3 Red Flags	Comments
MLPCS001RS	Land at Cromer Hyde Farm – Revised Scheme	Sieve 2 red. Sieve 3 red flags	5 – incl. 1 Very High	



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The table below compares the 17 Sites that remain after reinstating the Sieve 2 and Sieve 3 omissions.

**Table A2**

Site ID	Site Name	Reason for Omission	Sieve 3 Red Flags	Comments
MLPCS002	Land at Salisbury Hall	Likely significant public objections on highway grounds	5	
MLPCS006	Hatfield Aerodrome		5	
MLPCS007	Barwick	Sieve 2 red	8	
MLPCS008	Hatfield – Furze Field		3	
MLPCS009	Hatfield Quarry – Land adjoining Coopers Green Lane		5	
MLPCS010	The Briggens Estate		6	Under evaluated – 7 or more could be 10
MLPCS011	Water Hall Quarry – Farm Fields Area	Sieve 2 red	5	
MLPCS014	Water Hall Quarry – Bunkers Hill South Area	Sieve 2 red	5	
MLPCS015	Plashes Farm	Sieve 2 red – Very High	7 – incl. 2 Very High	
MLPCS016	Water Hall Quarry – Howe Green Area	Sieve 2 red	5	
MLPCS017	Robins Nest Hill	Sieve 2 red	2	
MLPCS018	Southfield Wood East	Sieve 2 red	4	
MLPCS019	Pipers End	Sieve 2 red	5	
	<b>Sites Submitted after Draft Minerals Local Plan consultation and assessed in 2018</b>			



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Site ID	Site Name	Reason for Omission	Sieve 3 Red Flags	Comments
MLPCS021	Land adjacent to Coursers Farm (North Mymms West)	Sieve 3 red flags and concerns over delivery and hazardous access	4 – incl.1 Very High	
MLPCS022	Land adjacent to Coursers Farm (North Mymms East)	Sieve 3 red flags and concerns over delivery and hazardous access	4	
MLPCS023	Warren Farm	Concerns regarding deliverability	5	
MLPCS001RS	Land at Cromer Hyde Farm – Revised Scheme	Sieve 2 red. Sieve 3 red flags	5 – incl. 1 Very High	



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### APPENDIX B

The table below is an appraisal of how the Briggens Estate designation as a MAS conforms with the Plan's Minerals Objectives.

**Table B1**

Objective	Commentary	Conclusion
<p>1. Ensure a steady and adequate supply of minerals to meet demand and protect mineral resources and infrastructure</p>	<p>In accordance with SSR (ii) the site access onto the B181 restricts traffic movements to and from the A414 to the east. There are no safe, suitable and practical means of access to and from the west. As noted in the Site Brief page 5, connecting the B181 to the disused west facing slip roads at Netherfield Lane involves the acquisition of land or at least rights across land. This proposal is not a SSR and therefore not binding on any applicant wishing to work MAS01. MAS01 cannot therefore be a source guaranteed to supply minerals to sites in Hertfordshire except to the Gilston Area. However, there are development synchronisation and other problems that make this unlikely and the GA Developers have not entered into such arrangements.</p>	<p>Hertfordshire currently uses around 75% of locally mined sand and gravel in the County. MAS01 cannot be relied upon to meet the Plan demand requirements for construction in Hertfordshire and its inclusion in Policy 2 as a source of minerals is therefore a major risk to the delivery of the Plan.</p> <p><b><i>MAS01 does not meet this objective</i></b></p> <p><b><i>This site should have been excluded from consideration as it fails Sieve 2 and cannot deliver the materials to meet the identified needs in the Plan.</i></b></p> <p><b><i>MAS01 is therefore economically unsustainable.</i></b></p>



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Objective	Commentary	Conclusion
<p>3. Encourage the sustainable use of materials, including the use of secondary and recycled aggregates, and the prior extraction of mineral before other development takes place</p>	<p>The Plan proposes to meet minerals demand primarily through the designated sites. There is no allowance for recycled materials. The gravel and sand demand figures are therefore inflated which throws doubt on the justification for the MAS's identified in Policy 2 as other more suitable sites may be able to meet the demand.</p>	<p>Further investigation needs to be undertaken to identify the quantity of aggregates that can be met through recycled materials and consequently a re-appraisal of the MAS options carried out. <b>MAS01 does not meet this objective</b> <b>MAS01 is therefore economically unsustainable</b></p>
<p>5. Ensure that mineral and waste management development addresses and minimises the impacts of and contributions towards climate change through appropriate mitigation and built-in resilience measures</p>	<p>This objective is addressed through Policy 1 at the planning application stage. However, under the Policy, account has to be taken regarding the use of recycled materials (h).</p>	<p>The Draft Plan has no allowance for recycled materials in the aggregate demand assessment (above). <b>Policy 10 should target a % of recycled materials to meet the aspirations of Policy 1.</b></p>
<p>6. Encourage the greater use of sustainable transport for the movement of minerals and waste, e.g., by road, rail and water</p>	<p>The closest Transport Infrastructure Site (TIS) to MAS01 is Rye House Hoddesdon which could be considered for bulk export of minerals. However, as access is limited to movements to and from the east, there is no suitable public highway connection.</p>	<p><b>MAS01 does not meet this objective</b> <b>MAS01 is therefore environmentally unsustainable</b></p>
<p>7. Protect and positively contribute towards human health and wellbeing</p>	<p>MAS01 adjoins the Gilston Area Village 7 as designated in the East Herts Local Plan 2018.</p>	<p>The proposals to designate MAS01 does nothing to contribute positively to the</p>





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Objective	Commentary	Conclusion
	<p>Village 7 will be 1,500 houses (approx.3,600 inhabitants). The village will be subjected to mining and minerals processing operations noise, dust, fumes, light pollution, mud on highways, for an extended period covering possibly 30 years with landfill and restoration activities.</p> <p>As discussed above, SSR access constraints will put pressure on using the B180 through Hunsdon High Street, Acorn Street and Church Lane to gain access to the A414 for west bound movements. This is a very real threat to Hunsdon. The environmental impact of gravel lorries in the village conservation area and road hazards created on residential streets and narrow country lanes represents a serious risk to health and wellbeing of the community let alone great danger.</p> <p>The proposals to open up and connect the Netherfield Lane private west facing slip roads advanced in the Site Brief cannot be depended upon as mitigation against this threat as described above. The land required is owned by the Lea Valley Regional Park Authority which has fundamental concerns regarding this proposal.</p>	<p>wellbeing and health of the local communities and they will include the 1500 dwellings in Village 7. In fact, the environmental nuisances, danger to highway users and destruction of recreational facilities does the opposite. Moreover, these impacts continue to cause harm for a very long time, maybe 30 years until the site is restored.</p> <p>The community, through bitter experience, do not accept that planning conditions will be effective in eliminating this threat. HCC may well decide that the minerals should go to the west at Hunsdon's expense.</p> <p><b><i>The possible use of the B180 as access to the Site presents a very real threat to Hunsdon and the community. MAS01 does not meet this objective.</i></b></p> <p><b><i>MAS01 is therefore socially unsustainable.</i></b></p> <p><b><i>This Site carries great risk to the safety and wellbeing of local communities and will attract volumes of highway objections. It should have been eliminated from the</i></b></p>



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Objective	Commentary	Conclusion
	Rights of way crossing MAS01 will have to be diverted around the quarry rendering these routes unattractive for recreational use.	selection process on the grounds of potential danger to highway safety and harmful impacts of the highway network and adjoining settlements.
8. Protect and enhance the natural, built and historic environment	<p>MAS01 Briggens Estate has high impacts on the adjacent Lord's Wood which is both Ancient Woodland and a Wildlife Site. Deer and owls are frequently seen in the vicinity. The settings of Olives Farmhouse and the other four Grade II listed buildings to the north would be severely impacted by the quarry.</p> <p>The Site would also be visible and heard from other heritage buildings in the vicinity including, St Dunstan's Church, The Church of St James, Stanstead Bury, Hunsdon House and the settlement around Netherfield House.</p> <p>The openness of the countryside between Stanstead Abbotts and Village 7 of the Gilston Area will be destroyed by quarrying activities leading to a perception of coalescence.</p> <p>Those travelling along the A414 may also be considered sensitive receptors, as they will also see the quarry where there was once gently rolling attractive open countryside.</p>	<p>The site selection process has inexplicably overlooked the development of the Gilston Area. Village 7 comprising 1500 dwellings will adjoin MAS01. The impact on these sensitive receptors has been ignored. The cumulative impact of continuous development fronting the A414 from Roydon Road to Harlow has also been overlooked.</p> <p>The site selection process under scores local wildlife impact in particular the impact on Lords Wood, the proximity of residential properties, landscape and visual assessment (Neighbourhood Plan Policy HE3), cumulative impact and highways assessment (see above).</p> <p>All should be red which then means that MAS01 should have 10 red scores moving it last place in the assessment.</p>



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Objective	Commentary	Conclusion
	<p>The site is traversed by Harcamlow Way and another footpath which would have to be diverted around the perimeter drastically reducing the recreational enjoyment of these facilities.</p> <p>Hunsdon Brook to the east of the Site flows directly into the Stort and the impact of pollution would be a significant and high risk.</p>	<p><b>MAS01 does not meet the objective</b></p> <p><b>MAS01 is therefore environmentally unsustainable</b></p>
<p>9. Protect against flooding and safeguard water quality and quantity</p>	<p>The Site Selection proforma records that ‘the implications of mineral extraction on groundwater contamination in the area remain uncertain’.</p>	<p>Further investigation is required to understand the impact of bromate contamination within the Site.</p>
<p>10. Recognise the importance of the minerals and waste sector in the local and wider economy as a generator of employment and its provision of infrastructure which supports businesses and communities</p>	<p>MAS01 would support construction operations in Essex and beyond but cannot support operations in Hertfordshire because of access constraints, save for those employed at the site. This is unlikely to generate any significant support for local businesses and communities.</p>	<p>The proposal to destroy attractive Hertfordshire countryside for the benefit of businesses in Essex is totally unacceptable.</p> <p><b>MAS01 does not meet this objective</b></p>