

1 Response Paper – Spatial Vision

Purpose of Spatial Vision

- 1.1 The Spatial Vision for the MLP provides a picture of how mineral and mineral related development will be delivered in the County during the plan period, which extends to 2029. It is the MPAs view of sustainable mineral development in Essex. Planning policies, as articulated through the MLP, are designed to contribute to the achievement of the Spatial Vision.

Summary of Position Prior to March 2021 Regulation 18 (Reg 18) Consultation

- Amended to better reflect desirable outcomes and accommodate proposed changes to policies suggested elsewhere in the Review.
- Section updated to highlight the importance of enhancing natural capital and mitigating against climatic impacts
- Reference to specific 'growth centres' in Essex to be removed given the move towards more collaborative working at the district level
- The subsequent revisions in approach to delivering strategic growth at potential new cross-boundary Garden Communities, making the location of future major growth locations less certain at the district level
- Spatial Vision updated to match the latest provisions of the NPPF and PPG more closely

Impact of Revisions to NPPF 2021

- 1.2 None of the amendments made to the NPPF in July 2021 had an effect on the Spatial Vision.

Summary of Issues Raised through March 2021 Reg 18 Consultation

- The Spatial Vision should refer to the current landbank level
- Reference to 'growth centres' should not have been removed
- Mineral workings should be used as an opportunity to log, sample, and analyse the geology of the mineral deposits
- Queries around various statistics and information and how these impact on the need for aggregate
- The use of sustainable materials and minimising the need for mineral extraction needs to be encouraged
- Disagreement around the spatial distribution of quarries in Essex
- Strategic lorry routes should be in place within Essex
- Matters relating to the employment generated from mineral workings
- Questions around the meaning of 'sustainable'
- Community engagement and approval should be encouraged

- Rural topographies only being valued for their capacity to provide mineral extraction opportunities

Addressing Issues Arising Out of March 2021 Reg 18 Consultation

- 1.3 This section acts to address the issues raised through the March 2021 Regulation 18 Consultation in relation to this policy, as set out above, and subsequently details any changes in approach made through their consideration. These changes of approach will be incorporated within The Draft Essex Minerals Local Plan 2025-2040 Regulation 18 document which will again be subjected to a Regulation 18 public consultation.
- 1.4 There now follows a discussion of each of the main issues raised during the Match 2021 Reg18 Consultation in relation to this Plan section:

The Spatial Vision should refer to the current landbank level

- 1.5 It was suggested that Section 3 of the MLP does not appear to indicate the current landbank level for sand and gravel. The current landbank level for sand and gravel is not included in the MLP as the landbank is different at any point in time and stated annually in the Local Aggregate Assessment. Therefore, it is not considered appropriate to include such information as the landbank figure is not stable.

Reference to 'growth centres' should not have been removed

- 1.1 Through the consultation the proposed removal of reference to specific growth centres was questioned. It was stated that this leads to a "paper chase" through other Local Plan documents and promotes uncertainty to residents, or industry, on where development will be considered most appropriate or acceptable. The proposed approach was also considered contrary to the Plan Strategy which seeks "to provide for the best possible geographic dispersal of sand and gravel". The MWPA however considers that ensuring geographical dispersal of mineral sites is independent of where housing growth locations may be. It is by ensuring geographical dispersal that the MLP allocations will be able to best respond to future housing growth locations irrespective of where they may be located.
- 1.2 Further, with the move towards joint working at the district level, future major growth locations in the County may not match the traditional areas where growth has previously taken place. As joint plans are at various stages of production, there is currently uncertainty as to where future major growth locations will be. As such, it is considered appropriate to state that the MLP will support aggregate facilities at areas of growth and development rather than attempt to specify where these might be. The removal of reference to specific growth centres will allow the plan to flexibly respond to any future change in growth locations, rather than create an inflexible list that may not reflect reality.
- 1.3 The proposed approach does not undermine the intention to 'seek to provide for the best geographical dispersal of sand and gravel' as this is independent of

where actual major growth locations may be. It is by ensuring geographical dispersal that the MLP allocations will be able to best respond to future housing growth locations irrespective of where they may be located.

Mineral workings should be used as an opportunity to log, sample, and analyse the geology of the mineral deposits

- 1.4 It was suggested through the consultation that mineral workings should be used as an opportunity to log, sample, and analyse the geology of the mineral deposits. The MWPA notes that when a site is considered for allocation, part of requested supported information is a schedule of borehole logs taken across the site. These borehole logs would be publicly available unless for commercial reasons the applicant requests signal such information is commercially sensitive. In addition, when a minerals planning application is made the application would also often be supported by borehole log data from across the application site, which would also be publicly available. However, once works begin on a site, this is by way of a commercial operation, and the MWPA has no authority to request such information is recorded as part of a public record as it is commercially sensitive. The MWPA is also unable to grant public access to commercial operations. Whether members of the public would be allowed on site to provide the opportunity to log and sample the mineral deposits as they are revealed during working would be a decision made by the operator/landowner. Such requests would be required to be made to them.

Queries around various statistics and information and how these impact on the need for aggregate

- 1.5 It was noted that reference to the garden communities in the Rationale Report (Essex MLP Review 2021 – Rationale behind the Proposed Amendments REG18_FINAL) are out of date and misleading. Information relating to Garden Communities was however correct at the time of writing. The removal of Garden Communities has had no impact on the need for additional housing, the removal of Garden Communities reflects that the Inspector thought that those particular mechanisms for the delivery of those houses was not appropriate for the reasons they set out in the Inspectors Report into the Examination in Public on those Plans. The NPPF expects strategic policy-making authorities to follow the standard method as outlined in Planning Practice Guidance for assessing local housing need. The standard method uses a formula to identify the minimum number of homes expected to be planned for, in a way which addresses projected household growth and historic under-supply. Development will therefore still be required to fulfil the need for housing in Essex. Information relating to Garden Communities will be updated as appropriate in future iterations of the MLP.
- 1.6 It was also noted that Figure 1– ‘Indicative Housing Growth as committed to in adopted and emerging Local Plans at April 2019’ is now out of date. At that time of writing the information around housing growth in this graph was considered

contemporary. Figure 1 and supporting text will be amended to bring this up to date in future iterations of the MLP.

- 1.7 It was suggested that reference to certain major infrastructure schemes in paragraph 2.19 were removed due to forecast errors. Five bullet points have been proposed to be removed from paragraph 2.19, however, their amendment or removal has not been undertaken for reasons of accuracy. Revisions relate to updating the statements. References to a new Lower Thames Crossing, Bradwell B (in Maldon District) and London Gateway were all replaced with updated statements which detail their progression through the planning system since the MLP was adopted. Reference to the construction of Crossrail was removed as it has largely been developed and is therefore no longer a source for significant aggregate demand. Reference to proposals for a container port at Bathside Bay have been removed as proposals have yet to commence and are under review now that the Port of Felixstowe and Harwich International Port have been granted Freeport status as Freeport East. Therefore, the demand for minerals from this project are uncertain so it is proposed to remove this from the MLP.
- 1.8 The reference to Gross Value Added (GVA) in the Spatial Portrait to bring the plan up to date regarding the economy has been questioned. Through the consultation it was said that this is a simple measure which does not value or measure the significance of a place or community.
- 1.9 The MWPA notes that GVA is a long-established economic productivity metric which measures the value of goods and services produced in an area, industry or sector of an economy, and it is therefore considered to have significance when communicating the economic section of a Spatial Portrait.
- 1.10 Through the consultation it was questioned whether ECC provide mediation between a planned extraction site and a local community. The MWPA provides an enforcement service which ensures activities permitted by ECC are carried out in line with planning permission. It is also good practice to set up a local liaison group that includes the operator and the local community representatives for new extraction sites/permissions. The MWPA secures this through the use of S106 legal agreements.

The use of sustainable materials and minimising the need for mineral extraction needs to be encouraged

- 1.11 It was suggested through the consultation that the MLP should consider the use of sustainable materials such as timber. However, it is not considered appropriate for the MLP to provide information on self-build/custom-build housing as this is something that would possibly be found in district/borough/city Local Plans. The role of the MLP is to set out a range of policies guiding minerals development in the County. Policy S4 of the Minerals Local Plan (2014) advocates reducing the use of mineral resources through reusing and recycling minerals generated because of development/ redevelopment. The MWPA is required to provide for the sustainable extraction of minerals, with 'need' established through a prescribed methodology set out in the NPPF. It is not

considered the role of the MLP to specifically propose or require the use of sustainable materials such as timber as an alternative to minerals discussed in the MLP.

- 1.12 As discussed in paragraph 2.23 of the MLP, most of the sand and gravel produced in Essex is used within the County itself, over 75% as of 2019. Comments received state that this should be targeted for reduction in favour of recovered or reconstituted gravel and bulk construction materials. Other comments received suggest that an aim should be incorporated into the Spatial Vision to minimise new mineral extraction and minimise landfill and incineration. However, the MWPA has no ability to require the use of recycled material or reduce demand and cannot “prevent future extraction” as this is a predetermination which isn’t allowed in the planning system. In any event, the National Planning Policy Framework requires MWPA’s to provide for the need for aggregate, with ‘need’ established through a prescribed methodology. Policy S4 of the Minerals Local Plan (2014) advocates reducing the use of mineral resources through reusing and recycling minerals generated because of development/ redevelopment but the MWPA cannot set a specific target for the amount of sand and gravel produced in Essex that needs to be replaced by recovered or reconstituted gravel and bulk construction materials. With regards to minimising landfill and incineration, these are issues addressed by both the MLP and the Essex and Southend-on-Sea Waste Local Plan. Each local plan seeks to do this by ensuring that there is sufficient waste management capacity for treatment methods higher in the waste hierarchy, such as aggregate recycling and biological treatment.
- 1.13 The 2018 Local Aggregate Assessment (LAA) reported that 1.05Mt recycled aggregate was produced in Essex and Southend-on-Sea in 2014. Paragraph 1.1 of the WLP (2014) states that “there is a need to move away from traditional forms of waste management towards greater levels of re-use, recycling and recovery.”.
- 1.14 It was suggested through the consultation that the MWPA needs to find ways to avoid emitting carbon dioxide into the atmosphere and reduce mineral extraction. Policy S3 of the MLP ensures that new development does not increase vulnerability to the range of impacts arising from climate change and supports appropriate measures to ensure the future resilience of communities and infrastructure. Therefore, applications for mineral development (including extensions to existing sites) should incorporate effective measures to minimise and/or offset greenhouse gas emissions and to ensure effective adaptation and resilience to future climatic changes, for the lifetime of the development (including restoration and aftercare). Policy S2 ensures that the MPA will promote sustainable development by requiring new development, where relevant, to accord with a number of sustainable development principles including ensuring minerals extraction minimises greenhouse gas emissions, is resilient and can demonstrate adaptation to the impacts of climatic change. The MLP also seeks to minimise carbon dioxide and methane emissions through Policy S11.

Disagreement around the spatial distribution of quarries in Essex

- 1.15 It was noted through the consultation that mineral workings seem to be concentrated in the north of Essex and this will have a long-term effect on the community as it will be a long time before the site is restored. Whilst this is recognised, minerals development differs from other forms of development because minerals can only be worked where they occur. Although it may be a long-term activity, unlike many other forms of development, mineral extraction is also a temporary use of land. Policy S12 in the MLP ensures 'mineral site restoration and after use' which requires proposals for minerals development to demonstrate that the land is capable of being restored at the earliest opportunity, to an acceptable environmental condition, to support Local Plan objectives and/or other beneficial after-uses, with positive benefits to the environment, biodiversity and/or local communities. The MLP contains policies which seek to ensure that cumulative impacts of mineral development with other development are mitigated against

Strategic lorry routes should be in place within Essex

- 1.16 Through the consultation it was suggested that transport infrastructure requires the establishment of strategic lorry routes and a greater consideration should be given to the use of rail routes.
- 1.17 Essex operates a route hierarchy as set out in the Highways Development Management Policies (February 2011) document. The route hierarchy catalogues roads by capacity, and mineral traffic will be expected to use those roads in the upper tiers, defined as trunk roads (including motorways), strategic routes and main distributors, and in some circumstances appropriate suitable secondary distributors. However, local roads in proximity to quarries may be required to be used prior to being able to join upper tier roads
- 1.18 Further, proposed amendments to Policy S11 ensure that "Planning applications for new minerals development proposals or proposals that generate traffic impact and/or an increase in traffic movements, shall be accompanied by a Transport Assessment or Transport Statement". Proposed amendments to Policy S11 also include that "minerals development shall not cause... Unacceptable impacts on the efficiency and/or capacity of the highway network (including the trunk road network)". Proposed new Paragraph 3.197 states that "The operator may also enter into a unilateral agreement to ensure acceptable routing of its HGVs."
- 1.19 Therefore, the most appropriate route will be assessed on a case-by-case basis in accordance with the route hierarchy (as set out in the Highways Development Management Policies (February 2011)). Proposed amendments to paragraph 3.173 (3.188) of the MLP also makes it clear that "The transportation of minerals over long distances is more sustainable by rail" and that the safeguarding rail head facilities will enable the long-distance haulage of aggregate imported to and exported from Essex to continue. There are however a very small number of railheads in Essex that are able to be used to transport minerals. Further, approximately 80% of sand and gravel extracted in Essex is used in Essex and

these shorter distances are more economic to be carried out by road due to an absence of rail facilities and the avoidance of double-handling.

Matters relating to the employment generated from mineral workings

- 1.20 Reference to employment generated in the Spatial Portrait has been said to have no basis of detail. However, the NPPF paragraph 209 (2021) states that “It is essential that there is a sufficient supply of minerals to provide the infrastructure, buildings, energy, and goods that the country needs.”. Without these, a sustainable economy would not be possible and therefore, it could be argued that most employment is reliant on a sufficient supply of minerals. It is considered appropriate to keep reference to employment generated in the Spatial Portrait.

Questions around the meaning of ‘sustainable’

- 1.21 Comments received through the consultation suggest that the word ‘sustainable’ in the plan had been misused as mineral workings seem to be concentrated in the north of Essex. It was suggested that mineral extraction and recovery should be relocated to hubs with more rail and/or wharf facilities.
- 1.22 Despite the potential impacts to the road network as a consequence of mineral development, there are limitations with alternative transport modes as the rail network is also under pressure and mainly geared for passengers. Transporting minerals by water is another alternative to road transport but opportunities in the Plan area are small due to the absence of wharf facilities managing aggregate in the Plan area.
- 1.23 Whilst full geographical dispersal across Essex to more closely support growth in every district in the county may be preferential, minerals development differs from other forms of development because minerals can only be worked where they occur. When the word ‘sustainable’ is referenced through the MLP it refers to the economic, social and environmental aspects of development. As per the NPPF Paragraph 7 (2021), sustainable development addresses “social, economic well-being and environmental protection.”, and the MLP must contribute to the social, economic, and environmental objectives set out in Paragraph 8.
- 1.24 A draft a criteria-based policy for new transshipment sites is proposed, however the MWPA are unable to bring these forward itself.

Community engagement and approval should be encouraged

- 1.25 The timescale of a five-year review has been questioned as it is suggested this is too long. The MLP was adopted in 2014. Paragraph 33 of the NPPF (2021) states (inter-alia) that “Policies in local plans and spatial development strategies should be reviewed to assess whether they need updating at least once every five years and should then be updated as necessary. Reviews should be completed no later than five years from the adoption date of a plan and should take into account changing circumstances affecting the area, or any relevant

changes in national policy.” Reviews at least every five years are a legal requirement for all local plans (Regulation 10A of the Town and Country Planning (Local Planning) (England) Regulations 2012 (as amended). This Review was completed in November 2019 and it concluded that the MLP would benefit from modification.

- 1.26 It was also mentioned through the consultation that communities expect and deserve consultations hgv ahead of implementation and communities should be consulted on MSAs and MICAs. All local plans, including site allocations, are subject to a public consultation ahead of implementation. A local plan, as described by the NPPF (2021) is “A plan for the future development of a local area, drawn up by the local planning authority in consultation with the community.”. As per the NPPF paragraph 210 (2021), planning policies should “safeguard mineral resources by defining Mineral Safeguarding Areas and Mineral Consultation Areas” (Primarily in two tier areas) “and adopt appropriate policies so that known locations of specific minerals resources of local and national importance are not sterilised by non-mineral development where this should be avoided (whilst not creating a presumption that the resources defined will be worked)”. MICAs are designated around existing, allocated and permitted mineral infrastructure. Therefore, MSAs, MCAs and MICAs are designated through the MLP as a consequence of the presence of unextracted resource or existing, allocated and/or permitted sites for mineral infrastructure. They are not designations to be consulted on individually. Information on how they have been designated can be found in the ‘Essex Minerals Local Plan Review 2021 – Report setting out the Rationale behind the Proposed Amendments – 2021’ from paragraph 4.209.
- 1.27 Through the consultation it was noted that there has been a shift from purely agricultural uses, important though they remain, towards integrating the cross-cutting benefits of green and blue infrastructure and “natural” capital growth”, which has resulted in after-uses that the community do not support. For example, the waste incinerator in Rivenhall.
- 1.28 A proposed amendment to Policy S12 - ‘Mineral Site Restoration and After Use requires proposals for minerals development to demonstrate “that the land is capable of being restored at the earliest opportunity to an acceptable environmental condition to support Local Plan objectives and/or other beneficial after-uses, with positive benefits to the environment, biodiversity and/ or local communities.”. The final restoration of each site will be decided on a case-by-case basis. The specific site mentioned, Rivenhall, does overlap with past areas of mineral working. The Rivenhall integrated waste management facility (IWMF) was granted permission following a call in Public Inquiry in 2009 and the site is now allocated for Waste Management in the Waste Local Plan (WLP) adopted in 2017. The WLP was subject to full public consultation and an Examination in Public. All Local Plans, including site allocations, are subject to a public consultation ahead of implementation.

Rural topographies only being valued for their capacity to provide mineral extraction

opportunities

- 1.29 It was suggested through the consultation that the list of rural topographies listed in the Spatial Portrait are not valued in their natural state, but only for their capacity to absorb more houses, roads and provide mineral extraction opportunities. Policy S10 aims to protect and enhance the environment and local amenity by setting out a criterion that applications for minerals development should demonstrate adherence to. Proposed amendments to Policy S12 - 'Mineral Site Restoration and After Use' which requires proposals for minerals development to demonstrate "that the land is capable of being restored at the earliest opportunity to an acceptable environmental condition to support Local Plan objectives and/or other beneficial after-uses, with positive benefits to the environment, biodiversity and/ or local communities.". Therefore, both policies ensure beneficial after uses. Policy DM1 sets out a criterion that proposals for minerals development will be subject to which ensures "that the development would not have an unacceptable impact, including cumulative impact with other developments". Mineral workings are temporary in nature. Restoration and after-use schemes are integral to site selection and the consideration of planning applications, with progressive working and restoration schemes expected.

Conclusion

- 1.30 Representations were broadly in agreement with the proposed changes to the Spatial Vision.
- 1.31 A few comments were received from different respondents objecting to the removal of reference to specific growth centres whilst others stated that references to the garden communities and other data were out of date. On this issue, the MWPA notes that as local plans, including joint local plans, in Essex are at various stages of production, there is currently uncertainty as to where future major growth locations will be. As such, it is considered appropriate to state that the MLP will support aggregate facilities at areas of growth and development rather than attempt to specify where these might be. The removal of reference to specific growth centres will allow the plan to flexibly respond to any future change in growth locations, rather than create an inflexible list that may not reflect reality, such as references to garden communities which are no longer being taken through the planning system.
- 1.32 In addition, Figure 1 – 'Indicative Housing Growth as committed to in adopted and emerging Local Plans at April 2019 and supporting text will be updated. At that time of writing the information around housing growth in this graph was considered contemporary, however this is now dated and needs amending.
- 1.33 A number of other comments sought to expand the MLP to cover a wider range of topics that would not be appropriate to address through a MLP or would otherwise see the MWPA seeking to influence the free market beyond its administrative responsibility. Whilst the points raised are noted, the MWPA is limited in its ability to be able to respond proactively to these.

- 1.34 Comments were also received relating to a specific site that may be subject to a planning application in the future. However, as the site is not proposed for allocation as part of this Review, it falls outside of the scope of this Regulation 18 consultation. Any application submitted to work a site that is not allocated as a Preferred Site in the Minerals Local Plan will be assessed against the relevant policy framework in the adopted Minerals Local Plan
- 1.35 Through the consultation comments states that the use of recycled and substitute recovered, or reconstituted gravel and bulk construction materials should be considered. However, the MWPA does not provide aggregate for a specific use, it is provided to the market. The role of the MLP is to set out a range of policies guiding minerals development in the County.
- 1.36 Comments received that that strategic lorry routes should be enforced to avoid the current “free for all” which is damaging communities and the rail network should be transporting the majority of minerals. The most appropriate route will be assessed on a case-by-case basis in accordance with the route hierarchy (as set out in the Highways Development Management Policies (February 2011)). There are proposed amendments to paragraph 3.173 (3.188) of the MLP makes it clear that “The transportation of minerals over long distances is more sustainable by rail” and that the safeguarding rail head facilities will enable the long-distance haulage of aggregate imported to and exported from Essex to continue. However, it must be noted that there are a very small number of railheads in Essex that are able to be used to transport minerals.
- 1.37 The consultation process and mediating power balance between minerals site and local communities was questioned through the consultation. All Local Plans, including site allocations, are subject to a public consultation ahead of implementation. In relation the mediating power, the MWPA provides an enforcement service which ensures activities permitted by ECC are carried out in line with planning permission.
- 1.38 A representation was received which stated that emerging Local Plans are behind schedule, the housing requirement is challenged and the GVA (gross Value added) is a simple measure which does not value or measure the significance of a place or community. GVA is a long-established economic productivity metric which measures the value of goods and services produced in an area, industry or sector of an economy, and it is therefore considered to have significance. The NPPF expects strategic policy-making authorities to follow the standard method as outlined in Planning Practice Guidance for assessing local housing need, and therefore local plans being behind schedule does not impact on the need for aggregate.
- 1.39 It was suggested through the consultation that the maintenance of existing infrastructure would reduce the need for new minerals infrastructure. The MWPA does not provide aggregate for a specific use, and whilst an MWPA can create a policy framework which encourages the minimisation of aggregate waste and the development of additional recycling capacity, the MWPA has no ability to ensure the use of recycled material or reduce demand for aggregate.

- 1.40 A comment received states that communities must be consulted on MSA and MICA designations. MSA and MCA designations are required as per Paragraph 210 of the NPPF (2021). MSAs, MCAs and MICAs are designated through the MLP as a consequence of the presence of unextracted resource or existing, allocated and/or permitted sites for mineral infrastructure. They are not designations to be consulted on individually.
- 1.41 Comments were also received relating to a specific site in Rivenhall in relation to site restoration and the community being consulted on restoration proposals. The Rivenhall IWMF was granted permission following a Public Inquiry in 2009 and the site is now allocated for Waste Management in the Waste Local Plan (WLP) adopted in 2017. The WLP was subject to full public consultation and an Examination in Public. All Local Plans, including site allocations, are subject to a public consultation ahead of implementation
- 1.42 A response was received that considered that the MLP misuses the word “sustainable” to promote ongoing mineral extraction. This is not agreed with. The MWPA considers that policies in the MLP act to allocate sufficient mineral to promote economic growth whilst also seeking to both minimise the social and environmental impact of the working of minerals and ensure that social and environmental benefits are returned through restoration.
- 1.43 Through the consultation no comments were received which resulted in any further proposed amendments to the Spatial Vision.

Table 1 - April 2021 Regulation 18 Consultation Responses to the Spatial Vision

ORGANISATION	ON BEHALF OF	SPATIAL VISION	SPATIAL VISION	ECC RESPONSE
Name of Organisation	Are you responding on behalf of another individual or organisation? - If Yes, Who?	1.Do you agree or disagree with the rationale behind the amendments proposed in this section of the emerging Minerals Local Plan? (see Rationale Report)	Please provide any comments below:	
Runwell Parish Council (631132323)	Runwell Parish Council	Agree	N/a	N/A
W H Collier Limited (769297167/ 942768790)		Agree		N/A
Thurrock Borough Council (97704900)	Thurrock borough Council	Agree	No additional comment.	Noted.
Blackwater Aggregates (623162177)		Agree		N/A
CEMEX (982058282)		Agree		N/A
Gent Fairhead		Agree		N/A

Aggregates (871678397)				
Resident (850344129)		Agree		N/A
CPRE Essex (665562826)		Agree		N/A
David L Walker Ltd (559449615)	Brice Aggregates	Agree (but wish to clarify)		N/A
Coggeshall Residents Against the Quarry (449012745)		Disagree (please clarify)	Para 4.10 and 4.11 in the Rationale Report are out of date and misleading. References to three garden communities in Uttlesford District as well as the two largest NEGCs overlook the fact that the proposals have all been found “unsound” by Planning Inspectors and effectively removed from the spatial strategy for the northern half of Essex.	Information relating to Garden Communities was correct at the time of writing, and will be updated as appropriate. The removal of Garden Communities has had no impact on the need for additional housing, the Inspector thought that those particular mechanisms for the delivery of those houses was not appropriate for the reasons they set out in the Inspectors Report into the Examination in Public on those Plans. The NPPF expects strategic policy-making authorities to follow the standard method as outlined in Planning Practice Guidance for assessing local housing need. The standard method uses a formula to identify the minimum number of homes expected to be planned for, in a way which addresses

				projected household growth and historic under-supply. Development will therefore still be required in north Essex.
Coggeshall Parish Council (598729813)	Coggeshall parish council	Disagree (please clarify)	Response would not fit into this table. Please see Table 2 below.	Response would not fit into this table. Please see Table 2 below.
Strutt & Parker (891506607)	G&B Finch	No comment		N/A
Kelvedon & Feering Heritage Society (677892382)		No comment		N/A
Suffolk County Council (549043477)		No comment	No Comment.	Noted.

ORGANISATION	ON BEHALF OF	SPATIAL VISION	SPATIAL VISION	ECC RESPONSE
Name of Organisation	Are you responding on behalf of another individual or organisation? - If Yes, Who?	2.Do you agree or disagree with the proposed amendments as set out in this section of the emerging Minerals Local Plan?	Please provide any comments and/or alternative wording for this section of the Plan below:	
Runwell Parish Council (631132323)	Runwell Parish Council	Agree	N/a	N/A

W H Collier Limited (769297167/ 942768790)		Agree		N/A
Thurrock Borough Council (97704900)	Thurrock borough Council	Agree	No additional comment.	Noted.
Blackwater Aggregates (623162177)		Agree		N/A
CEMEX (982058282)		Agree		N/A
Gent Fairhead Aggregates (871678397)		Agree		N/A
Resident (850344129)		Agree		N/A
CPRE Essex (665562826)		Agree		N/A
Kent County Council (266388168)		Agree	KCC agree that the Plan's Spatial Vision continues to reflect the tenants of sustainable development and may need only minor revision to take regard for the provisions of the government's A Green Future: Our 25 Year Plan 2018.	Noted.
David L Walker Ltd (559449615)	Brice Aggregates	Agree (but wish to clarify)	Section 3 of the plan sets out spatial vision, aims and strategic objectives that have been used to develop Core	Noted.

			and Development Control Policies. These are all supported by BAL.	
			When considering the provision of primary mineral supply Section 3 does not appear to indicate the current landbank level for sand and gravel. It is understood that the documents released with the consultation include the latest LAA, and therefore it would seem appropriate to include confirmation of the landbank figure within the emerging plan	The current landbank level for sand and gravel is not included in the MLP as the landbank is different at any point in time and stated annually in the Local Aggregate Assessment. Therefore, it is not considered appropriate to include such information as the landbank figure is not stable.
Coggeshall Parish Council (598729813)	Coggeshall parish council	Disagree (please clarify)	Response would not fit into this table. Please see Table 2 below.	Response would not fit into this table. Please see Table 2 below.
Heatons (451589647)	Tarmac	Disagree (please clarify)	The Strategy Table 1 – Vision for Essex (part c) We do not agree with removal of reference to the specific growth centers. The amended wording results in a ‘paper chase’ through other Local Plan documents and promotes uncertainty to local residents or industry on where development will be	With the move towards joint working at the district level, future major growth locations in the County may not match the traditional areas where growth has previously taken place. As joint plans are at various stages of production, it is considered appropriate to state that the MLP will support aggregate facilities at areas of growth and development rather than attempt to specify where

			<p>considered most appropriate or acceptable. The Inspector for the Warwickshire MLP EiP in the Autumn of last year requested that the MPA ensure that information was available to a reader within the one document.</p> <p>The proposed approach is considered contrary to the Plan Strategy (page 45) which seeks 'to provide for the best possible geographic dispersal of sand and gravel, accepting that due to geographic factors the majority of sites will be located in the central and north eastern parts of the County'. Identification of specific growth areas would provide context to the overall strategy.</p>	<p>these might be. The removal of reference to specific growth centres will allow the plan to flexibly respond to any future change in major growth locations, rather than create an inflexible list that may not reflect reality.</p> <p>The proposed approach does not undermine the intention to 'seek to provide for the best geographical dispersal of sand and gravel' as this is independent of where actual major growth locations may be. It is by ensuring geographical dispersal that the MLP allocations will be able to best respond to future housing growth locations irrespective of where they may be located.</p>
Mineral Products Association (339717535)		Disagree (please clarify)	<p>Table 1. Vision for Essex:</p> <p>The removal of the stated growth centres is not supported. If these changes are implemented, then the reader must endeavour to find the growth centres from other documentation. The</p>	<p>With the move towards joint working at the district level, future major growth locations in the County may not match the traditional areas where growth has previously taken place. As joint plans are at various stages of production, it is</p>

			<p>Inspector at the recent Warwickshire Mineral Plan EiP was highly critical of the authority for such an approach and has asked them to ensure all relevant information is available to the reader of the one document.</p> <p>Furthermore, this approach seems to be counterintuitive when considering part c) of Table 1 where it states; <i>'The lack of primary aggregate in the south and west of the County will be addressed to ensure that planned urban growth can take place without unnecessarily long transport distances.'</i> Without the clarity of the growth areas this becomes difficult for the public and industry to understand the spatial requirements and would appear also to defeat the Plan Strategy (page 45) which seeks <i>'to provide for the best possible geographical dispersal of sand and gravel...'</i></p>	<p>considered appropriate to state that the MLP will support aggregate facilities at areas of growth and development rather than attempt to specify where these might be. The removal of reference to specific growth centres will allow the plan to flexibly respond to any future change in major growth locations.</p> <p>The proposed approach does not undermine the intention to 'seek to provide for the best geographical dispersal of sand and gravel' as this is independent of where actual major growth locations may be. It is by ensuring geographical dispersal that the MLP allocations will be able to best respond to future housing growth locations irrespective of where they may be located, rather than create an inflexible list that may not reflect reality</p>
GeoEssex (538324742)		Agree (but wish to clarify)	Table 1 Vision: Add reference to using the	When a site is considered for allocation, part of requested supported information is a

			<p>opportunity to log, sample and analyse the geology of the mineral deposits as they are revealed by the working of the mineral.</p> <p>Knowledge of where minerals are located has been largely derived through analysis of deposits revealed by mineral working in the past. Continuation of the opportunity to log and sample the mineral deposits as they are revealed during working will enhance the understanding of the nature of the deposits to contribute to the efficiency of working the deposits as well as to the body of scientific knowledge before it is removed by quarrying.</p>	<p>schedule of borehole logs taken across the site. These borehole logs would be publicly available unless for commercial reasons the applicant requests signal such information is commercially sensitive. In addition, when a minerals planning application is made the application would also often be supported by borehole log data from across the application site, which would also be publicly available. However, once works begin on a site, this is by way of a commercial operation, and the MWPA has no authority to request such information is recorded as part of a public record as it is commercially sensitive. The MWPA is also unable to grant public access to commercial operations. Whether members of the public would be allowed on site to provide the opportunity to log and sample the mineral deposits as they are revealed during working would be a decision made by the operator/landowner. Such requests would be required to</p>
--	--	--	---	--

				be made to them.
Strutt & Parker (891506607)	G&B Finch	No comment		N/A
Suffolk County Council (549043477)		No comment	No Comment.	Noted.

Table 2 - April 2021 Regulation 18 Consultation Single Response to the Spatial Vision

1.Do you agree or disagree with the rationale behind the amendments proposed in this section of the emerging Minerals Local Plan? (see Rationale Report)	ECC Response
<p>Minerals unfortunately are deposited in this area which have over the years increased its demand. However enough is enough with regards to developing the plan to create a further quarry closer to Coggeshall. This will have a major effect on Coggeshall as the quarry will exist for over 30 years so children who are 5 now will be 30 plus before the quarry is landscaped</p> <p>The housing growth figures used are out of date and questioned and with it the Minerals Local Plan.</p> <p>With insufficient new, recycled and substitute recovered or reconstituted gravel and bulk construction materials –</p>	<p>Minerals development differs from other forms of development because minerals can only be worked where they occur. Policy S12 - 'Mineral Site Restoration and After-Use' requires proposals for minerals development to demonstrate "that the land is capable of being restored at the earliest opportunity to an acceptable environmental condition <u>to support Local Plan objectives</u> and/or other beneficial after-uses, with positive benefits to the environment, biodiversity and/ or local communities." The proposal for Coggeshall, which is a proposed joint venture between industry and the Environment Agency, has yet to be submitted as a planning application and is not a proposed allocation in the MLP Review. As such it falls outside the scope of the Regulation 18 consultation.</p> <p>The information used was the latest available at the time of document production. Figure 1 – 'Indicative Housing Growth <u>as committed to in adopted and</u></p>

<p>sustainable materials should be also be considered instead e.g. timber.</p>	<p><i>emerging Local Plans at April 2019 in Essex up to 2031'</i> and its associated supporting text will be amended to bring this up to date.</p> <p>Policy S4 of the Minerals Local Plan (2014) advocates reducing the use of mineral resources through reusing and recycling minerals generated because of development/ redevelopment. The MWPA does not provide aggregate for a specific use, it is provided to the market. The National Planning Policy Framework (NPPF) requires MWPA's to provide for the need for aggregate, with 'need' established through a prescribed methodology. As the MWPA we have no ability to ensure the use of recycled material or reduce demand.</p> <p>The role of the MLP is to set out a range of policies guiding minerals development in the County. Whilst it contains policies that act to facilitate additional aggregate recycling capacity and encourage the sustainable use of minerals, including minimising mineral waste, it cannot require that aggregates are not used in construction.</p>
<p>Major infrastructure schemes post covid and climate emergency are now less likely especially.</p> <p>One only has to look at the crossings out in the previous version to see the forecast errors herein. Accuracy is vital, and so is a target to reduce minerals use per m2 developed (for all new construction and repair and maintenance activities).</p>	<p>Assuming this is in relation to the Spatial Portrait and Key Minerals Planning Issues, the major infrastructure projects set out in Paragraph 2.19 will be updated accordingly as the plan is developed.</p> <p>Five bullet points have been proposed to be removed from Paragraph 2.19 of the adopted MLP, however, their crossing out has not been undertaken for reasons of accuracy. References to a new Lower Thames Crossing, Bradwell B (in Maldon District) and London</p>

	<p>Gateway were all replaced with updated statements which detail their progression through the planning system since the MLP was adopted. Reference to the construction of Crossrail was removed as it has largely been developed and is therefore no longer a source for significant aggregate demand. Reference to proposals for a container port at Bathside Bay have been removed as proposals have yet to commence and are under review now that the Port of Felixstowe and Harwich International Port have been granted Freeport status as Freeport East. Therefore, the demand for minerals from this project are uncertain so it is proposed to remove this from the MLP.</p>
<p>The 75% of minerals extracted and used in ESSEX should be targeted for reduction in favour of recovered or reconstituted gravel and bulk construction materials.</p>	<p>The MWPA does not provide aggregate for a specific use, it is provided to the market. There is a requirement for MWPA's to provide for the sustainable extraction of minerals, with 'need' established through a prescribed methodology set out in the NPPF. The MWPA does not have the ability to require the use of recycled material or reduce demand. Policy S4 of the Minerals Local Plan (2014) advocates reducing the use of mineral resources through reusing and recycling minerals generated because of development/ redevelopment.</p>
<p>The cited silica sand pricing has not historically resulted in ANY benefit to the communities from which it has been transported through day in and day out on HGVs.</p>	<p>Value of goods travelling through a local community is not a planning matter for minerals or any other type of goods. The high price that can be secured for silica sand is a reflection of the demand for the mineral. There are no mechanisms through which the value of a commodity, mineral or otherwise, travelling through a local community can be taxed for the benefit of that community.</p>
<p>How much of the Local Aggregate Assessment is recovered</p>	<p>The 2018 Local Aggregate Assessment (LAA) reported</p>

<p>or reconstituted gravel and bulk construction materials – why is this not measured in this report as new minerals become more physically, environmentally, and politically difficult to justify digging out?</p>	<p>that 1.05Mt recycled aggregate was produced in Essex and Southend-on-Sea in 2014. Paragraph 1.1 of the WLP (2014) states that “<i>there is a need to move away from traditional forms of waste management towards greater levels of re-use, recycling and recovery.</i>”. Whilst an MWPA can create a policy framework which encourages the minimisation of aggregate waste and the development of additional recycling capacity, the MWPA does not have the ability to ensure the use of recycled material or reduce aggregate demand.</p>
<p>Essex should have a strategic lorry route for HGV traffic – especially x-ESSEX. Communities such as Bradwell and Coggeshall have been punished for years.</p>	<p>Essex operates a route hierarchy as set out in the Highways Development Management Policies (February 2011) document. The route hierarchy catalogues roads by capacity, and mineral traffic will be expected to use those roads in the upper tiers, defined as trunk roads (including motorways), strategic routes and main distributors, and in some circumstances appropriate suitable secondary distributors. However, local roads in proximity to quarries may be required to be used prior to being able to join upper tier roads</p> <p>Through the MLP review proposed amendments ensure that Policy S11 states that “<u><i>Planning applications for new minerals development proposals or proposals that generate traffic impact and/or an increase in traffic movements, shall be accompanied by a Transport Assessment or Transport Statement</i></u>”. The policy then goes on to explain the criteria that needs to be met and this includes “<u><i>Consideration of road users, including cyclists, horse riders and pedestrians</i></u>”. Proposed amendments to Policy S11 also include that “Minerals development shall not</p>

	<p>cause... <u>Unacceptable impacts on the efficiency and/or capacity of the highway network (including the trunk road network)</u>". Proposed new Paragraph 3.197 states that "<u>The operator may also enter into a unilateral agreement to ensure acceptable routing of its HGVs.</u>" Therefore, the most appropriate route will be assessed on a case-by-case basis in accordance with the route hierarchy.</p>
<p>This consultation process is one of the least public friendly I have ever seen. The combination of review of 230 page document, highly prescribed feedback process creating hours of work to repeat in each section is designed to frustrate consultation and reduce local input. Let's look at the responses and assess its consulting effectiveness, a review at 5 years is too long – especially in the light of the climate crisis.</p>	<p>The Essex Minerals Local Plan (MLP) was adopted in 2014. Paragraph 33 of the NPPF (2021) states (inter-alia) that "Policies in local plans and spatial development strategies should be reviewed to assess whether they need updating at least once every five years and should then be updated as necessary. Reviews should be completed no later than five years from the adoption date of a plan and should take into account changing circumstances affecting the area, or any relevant changes in national policy." Reviews at least every five years are a legal requirement for all local plans (Regulation 10A of the Town and Country Planning (Local Planning) (England) Regulations 2012 (as amended). This Review was completed in November 2019 and it concluded that the MLP would benefit from modification.</p>
<p>We note that the waste group is excluded from consultees – under the response to climate change we need to find ways to avoid emitting CO2 to the atmosphere and also reduce minerals extraction – for bulk construction materials – why are we burning / burying what we could be building with?</p>	<p>Paragraph 3.14 of the MLP states that "<u>It is vital that Local Plans ensure that new development does not increase vulnerability to the range of impacts arising from climate change and support appropriate measures to ensure the future resilience of communities and infrastructure.</u>". Policy S2 states that "<u>The Mineral Planning Authority will promote sustainable development by requiring new</u></p>

	<p><u>development, where relevant, to accord with the following principles:</u> ... 4. Improving access to, and the quality and quantity of recycled/ secondary aggregates, by developing and safeguarding a well distributed County-wide network of strategic and non-strategic aggregate recycling sites". The plan then also seeks to establish a network of aggregate recycling sites through Policy S5.</p> <p>No 'group' has been excluded from the consultation. Proximate Waste Planning Authorities were consulted under Regulation 18 and through the Duty to Cooperate.</p>
<p>The key drivers for development have changed significantly since this report was drafted including but not limited to; reduced Garden Communities, no rapid transit link Marks Tey to Colchester, no new A120 etc etc. The growth targets need to be rapidly revised down.</p>	<p>Assuming this is in relation to the Spatial Portrait and Key Minerals Planning Issues, the Spatial Portrait will be updated accordingly as the plan is developed. Information around growth areas in Essex has been included to bring the plan up to date. The removal of Garden Communities has had no impact on the need for additional housing, the Inspector thought that those particular mechanisms for the delivery of those houses was not appropriate for the reasons they set out in the Inspectors Report into the Examination in Public on those Plans. The NPPF expects strategic policy-making authorities to follow the standard method as outlined in Planning Practice Guidance for assessing local housing need. The standard method uses a formula to identify the minimum number of homes expected to be planned for, in a way which addresses projected household growth and historic under-supply. Figure 1 – "Housing Growth as committed to in</p>

	<p>adopted and emerging Local Plans at April 2019” and supporting text will be amended to bring this up to date.</p>
<p>Emerging Local Plans are behind schedule, the housing requirement is challenged and the GVA (gross Value added) is a simple measure which does not value or measure the significance of a place or community.</p>	<p>GVA is a long-established economic productivity metric which measures the value of goods and services produced in an area, industry or sector of an economy, and it is therefore considered to have significance. The NPPF expects strategic policy-making authorities to follow the standard method as outlined in Planning Practice Guidance for assessing local housing need, and therefore local plans being behind schedule does not impact on the need for aggregate.</p>
<p>The statement summarising the employment generated from sectors of the economy has no basis of detail.</p> <p>The opportunity cost and value lost of concreting greenfield to speed up HGV traffic across Essex is vast – but has not been measured or developed in ECC to date.</p>	<p>The NPPF Paragraph 209 (2021) states that “It is essential that there is a sufficient supply of minerals to provide the infrastructure, buildings, energy, and goods that the country needs.”. Without these, a sustainable economy would not be possible and therefore, it could be argued that most employment is reliant on a sufficient supply of minerals.</p> <p>The role of the MLP is to set out a range of policies guiding minerals development in the County, it is not a transport plan.</p>
<p>Transport Infrastructure requires a strategic review and the establishment of STRATEGIC LORRY ROUTES FOR X-ESSEX TRAFFIC. The current “free for all” is damaging communities. The removal of lorry filling fuel facilities in rural single lane locations should be prioritised with a move to hydrogen for the fleet x-Essex gravel fleet.</p> <p>During / Post covid the rail network has been operating sub optimally, yet still the majority of minerals are transported by road with HGV, on any road, not strategic lorry routes. This</p>	<p>Policy S11 states that “<u>Planning applications for new minerals development proposals or proposals that generate traffic impact and/or an increase in traffic movements, shall be accompanied by a Transport Assessment or Transport Statement</u>”. Therefore, the most appropriate route will be assessed on a case-by-case basis in accordance with the route hierarchy (as set out in the Highways Development Management Policies (February 2011). Proposed amendments to paragraph 3.173 (3.188) of the MLP makes it clear that</p>

<p>has caused potholes, drainage and costly verge damage (which require frequent repair- which disrupts rural communities and businesses – but does not get billed to the fast heavy HGVs which damage the road network).</p>	<p>“The transportation of minerals over long distances is more sustainable by rail” and that the safeguarding rail head facilities will enable the long-distance haulage of aggregate imported to and exported from Essex to continue. There are however a very small number of railheads in Essex that are able to be used to transport minerals. Further, approximately 80% of sand and gravel extracted in Essex is used in Essex and these shorter distances are more economic to be carried out by road due to an absence of rail facilities and the avoidance of double-handling.</p>
<p>This list of areas of interest is significant; countryside, rivers, listed buildings etc etc , however the of these communities and countryside is not measured in their natural state only for their capacity to absorb, more houses, roads and provide mineral extraction opportunities.</p> <p>The current value and potential value of sustainable growth in these communities from leisure and tourism GVA, jobs etc should be compared with the build type growth solely advocated in this paper, there is no balance</p>	<p>Policy S10 aims to protect and enhance the environment and local amenity by setting out a criterion that applications for minerals development should demonstrate adherence to. Policy S12 -‘Mineral Site Restoration and After-Use requires proposals for minerals development to demonstrate “that the land is capable of being restored at the earliest opportunity to an acceptable environmental condition <u>to support Local Plan objectives</u> and/or <u>other</u> beneficial after-uses, with positive benefits to the environment, biodiversity and/ or local communities.”. Therefore, both policies ensure beneficial after uses. Policy DM1 sets out a criterion that proposals for minerals development will be subject to which ensures “that the development would not have an unacceptable impact, including cumulative impact with other developments”. Mineral workings are temporary in nature. Restoration and after-use schemes are integral to site selection and the consideration of planning applications, with progressive working and restoration schemes expected.</p>

	<p>The role of the MLP is to set out a range of policies guiding minerals development in the County. The majority of development allocated in the MLP is temporary in nature and allocated land will be restored.</p>
<p>It is clear from map 3 that certain communities have now done their bit; Coggeshall, Colchester and Rayne and that the strategy should relocate minerals extraction and recovery to hubs with more rail / water borne support and rely less on road HGV The word “sustainable” has been misused to promote ongoing mineral extraction in Essex.</p>	<p>Despite the potential impacts to the road network as a consequence of mineral development, there are limitations with alternative transport modes as the rail network is also under pressure and mainly geared for passengers. Transporting minerals by water is another alternative to road transport but opportunities in the Plan area are small due to the absence of wharf facilities managing aggregate in the Plan area. Whilst full geographical dispersal across Essex to more closely support growth in every district in the county may be preferential, minerals development differs from other forms of development because minerals can only be worked where they occur. When the word ‘sustainable’ is referenced through the MLP it refers to the economic, social and environmental aspects of development. As per the NPPF Paragraph 7 (2021), sustainable development addresses “social, economic well-being and environmental protection.”, and the MLP must contribute to the social, economic, and environmental objectives set out in Paragraph 8. A draft a criteria-based policy for new transshipment sites is proposed, however the MWPA are unable to bring these forward itself.</p>
<p>Sustainable mineral and mineral-related development will be approved when aligned to the target of recovered or reconstituted gravel and bulk construction materials without delay when in accordance with this Plan, whereas new mineral extraction will be analysed in detail with simple community consultation ahead of new activity – EVEN if</p>	<p>Policy S4 in the MLP requires sustainable procurement and a reduction of primary mineral use and Policy S5 seeks to establish a network of aggregate recycling sites. New proposals are subject to a public consultation at both the local plan allocation and planning application stages.</p>

<p>(and especially) if adjacent to historic extraction sites [over 5 years]. Minerals are essential for buildings and roads however there comes a point that the demands for minerals should be reduced. Recycling and retaining building materials should be a priority.</p>	
<p>Maintenance of existing infrastructure will reduce its need for new minerals in preference for recovered or reconstituted gravel and bulk construction materials to reduce incineration and landfill in Essex and beyond.</p> <p>Rural communities will not be sacrificed for urban expansion plans.</p>	<p>The MWPA does not provide aggregate for a specific use, the MWPA allocates land to allow for the provision of aggregate to the market at a rate which provides for the need for aggregate. Whilst an MWPA can create a policy framework which encourages the minimisation of aggregate waste and the development of additional recycling capacity, the MWPA has no ability to ensure the use of recycled material or reduce demand for aggregate. Policy S4 of the Minerals Local Plan (2014) advocates reducing the use of mineral resources through reusing and recycling minerals generated because of development/ redevelopment. Policy S9 ensures the safeguarding of mineral sites and infrastructure, including the site allocations within the plan.</p>
<p>What role will ECC play in mediating the power balance between a planned extraction site and a local community or will this be delegated to local communities supported by strategic lorry routes and local powers of enforcement compliance? E.g. Fines.</p>	<p>The MWPA provides an enforcement service which ensures activities permitted by ECC are carried out in line with planning permission. It is also good practice to set up a local liaison group that includes the operator and the local community representatives for new extraction sites/permissions. The MWPA secures this through the use of S106 legal agreements.</p>
<p>There is currently NO PLAN for recovered or reconstituted gravel and bulk construction materials... our communities expect and deserve plans and consultation ahead of implementation not some “existing or future adopted Local Plans and/ or Joint Strategic Plans”... phrase. This will save</p>	<p>Policy S4 in the MLP requires sustainable procurement and a reduction of primary mineral use and Policy S5 seeks to establish a network of aggregate recycling sites. All Local Plans, including site allocations, are subject to a public consultation ahead of</p>

<p>ECC millions in new minerals extraction costs and communities decades or more of HGV nightmare!</p>	<p>implementation.</p>
<p>Communities must be consulted on any 'Minerals Safeguarding Areas' (MSA's) which may sterilise future mineral resources by development (including tree planting or re-wilding).</p> <p>Mineral Infrastructure Consultation Areas (MICAs) will not be designated without appropriate community engagement and appropriate positive approval.</p>	<p>As per the NPPF Paragraph 210 (2021), planning policies should “safeguard mineral resources by defining Mineral Safeguarding Areas and Mineral Consultation Areas” (Primarily in two tier areas) “and adopt appropriate policies so that known locations of specific minerals resources of local and national importance are not sterilised by non-mineral development where this should be avoided (whilst not creating a presumption that the resources defined will be worked)”. MICAs are designated around existing, allocated and permitted mineral infrastructure. Therefore, MSAs, MCAs and MICAs are designated through the MLP as a consequence of the presence of unextracted resource or existing, allocated and/or permitted sites for mineral infrastructure. They are not designations to be consulted on individually. Information on how they have been designated can be found in the ‘Essex Minerals Local Plan Review 2021 – Report setting out the Rationale behind the Proposed Amendments – 2021’ from paragraph 4.209. All Local Plans, including site allocations, are subject to a public consultation ahead of implementation.</p>