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Essex County Council
Minerals and Waste Planning
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Dear Madam

**Public consultation on Policy S6 General Principles for Sand and Gravel
Provision and Proposed Call for sites**

Thank you for the opportunity to comment on the above proposals.

Braintree District Council wishes to express disappointment that new sites will now need to be allocated prior to the end of the plan period. The amount of land allocated should be kept to a minimum. However, the reduction in the amount of mineral needed for extraction from 4.31 million tonnes per annum (mtpa) to 3.74mtpa is welcomed.

Whilst not formally part of this consultation, Braintree District would wish to reiterate its concerns made in earlier comments regarding the number and distribution of minerals extraction sites already within its area and the possibility of further such sites arising from the call for sites. As you will be aware the draft Plan continued to indicate that over 50% of the sand and gravel for the whole of Essex was coming from Braintree District and much from a small area in the District, having a disproportionate impact on the Council's local communities, infrastructure and environment. Whilst the Council notes that the minerals can clearly only be dug where they are located, we would ask that no further allocations are made within Braintree.

The District acknowledges that the position expressed in the Topic paper is an interim focussed one and looks forward to commenting more fully at a later stage in a future Regulation 18 consultation as well as during the Call for Sites procedure.

The plan led approach that resists approval of windfall sites and that mineral extracted through approval of windfall sites is counted as contributing towards meeting the County's mineral need is supported.

It is noted that the anticipated Coggeshall flood alleviation scheme is not allocated in the plan and would be judged as a windfall site were an application to be received.

The Council notes the Essex County Council response on this, and welcomes that policy will be strengthened and if necessary strengthened further, to ensure that windfall's are only allowed in the most exceptional of circumstances and then the cumulative impact is fully considered.

Yours sincerely,

Julie O'Hara

Senior Planning Officer (Policy)

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