

Essex County Council
Planning Service – Minerals & Waste
Economy, Localities & Public Health
County Hall
Chelmsford
Essex CM1 1QH

By email: mbrenton@peterbrett.com

Date: 10 December 2018

Dear Mr Brenton

Land at Woodhouse Lane, Broomfield, Chelmsford

Thank you for the addendum to the MRA issued as a response to those concerns raised by the Minerals Planning Authority in October 2018. It is however noted that the addendum only seems to address the matters of need for additional boreholes and recalculation of the estimated mineral resource and overburden.

Reserve assessment

It is noted that two additional boreholes have been undertaken on the northern edge of the site. However, they were undertaken very close to the boundary, it would have been preferable if they had been further into the site but it is appreciated that their location may have been influenced by the need to avoid impact upon archaeological remains.

The two additional boreholes indicate a good mineral to overburden ratio of approximately 1:1.

The overall mineral:overburden ratios are somewhat confusing. The original individual boreholes show values in the range of 2.7:1 to 1:1.7, but the average ratio was stated as 4.6:1. The additional boreholes show a good mineral:overburden ratio of 0.93:1 and 1.38:1. It seems strange that the overall overburden to mineral ratio has deteriorated from 4:6:1 to 5.6:1.

These overall ratios do not seem to be borne out by the borehole information.

I understand that a model has been used to calculate the volume of overburden and mineral resource. However, a fuller explanation as to how the volumes have been calculated is required to understand the average overburden to mineral ratios.

Constraints

The stand-off to property's still appears to be slightly generous i.e. greater than 100m. To clarify, this distance is to be taken from the façade of the property and not to the extent of any other land associated with the built development.

It is also not acknowledged that the archaeological interests in the area would only be a constraint if remains were required to be preserved in situ, which at this stage I understand is not the case. Thus there is no need to exclude these areas from the potential mineral extraction area.

Landbank and LLA

It has not been acknowledged that the size of the Landbank of permitted reserves has no bearing on the assessment of whether there is a mineral resource of economic significance. Mineral safeguarding acts to prevent the sterilisation of economically viable mineral to ensure that best-use is made of this finite resource.

Existing reservoir & north east area

It would appear from drawing 37472/2001/030 that the area in the north east of the site and around the reservoir has been excluded from the area assessed for mineral resource. It has not been justified why these areas have been excluded.

To be clear, there is no objection to the continued allocation of this site. However, the MRA as submitted is not considered to adequately assess the potential for economically viable mineral to be present on site for the reasons identified above. . If the MRA and addendum MRA are used in their current form to accompany a planning application in future, the County Council will likely object.

I trust that this is of assistance but should you have any queries regarding the content of this letter please do not hesitate to contact me.

Yours sincerely

Claire Tomalin
Principal Planning Officer

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