

Colney Heath Parish Council
Hatfield Quarry appeal
Proof of Evidence Summary

Witness M.F Rawlins

Green Belt

- 1.1 The application site is within the Green Belt zone between Hatfield and St Albans and is at a point where the separation is at its narrowest at 1.3km. When considering Green Belt policies for this site we must also consider the cumulative impact on the communities of Ellenbrook and Smallford as both are inter-related in this location.
- 1.2 We have reviewed the related Green Belt and Landscape Assessments. In the area 36 Green Belt Purposes Assessment it confirms that this area performs three functions of the Green Belt purposes significantly.
- 1) To prevent neighbouring town merging
 - 2) To assist in safeguarding the countryside from encroachment
 - 3) Maintain the existing settlement pattern
- 1.3 All assessments identify the importance that Ellenbrook Country Park plays in maintaining the separation between Hatfield and St Albans. The short distance of 'rural' highway between Smallford and Ellenbrook also plays a very significant role in maintaining the community's separation.
- 1.4 Both the proposed entrance from St Albans Road (A1057) and the processing plant with the related storage yards will have very significant urbanising influence on the area due to their height and scale. Any mitigation will only work in the longer term, due the height of the proposed structure and stockpiles and the time new landscape planting will take to establish and fulfil its intended role.
- 1.5 The current gap between St Albans and Hatfield is approximately 1.3km, the site access is within this zone and due its size and the requirement to have

turn in for lorries, removal of trees and hedgerows would reduce the 'rural' highway to about 1km.

- 1.6 The processing area will project approximately 600m beyond Smallford into the country park and due to its height and scale will have a significant urbanising influence. This again reduces the gap between Hatfield and St Albans to below 1km.
- 1.7 Due to nature the of quarrying, all the existing tree and shrub growth will be removed leaving a prairie like landscape post quarrying until the reinstated plantings establish and make significant growth. This will make significant changes to the character of the area and reduce its current charm and benefits for walking and relaxation.
- 1.8 All the evidence from Welwyn Hatfield and St Albans Local Plans shows this site performs a key role in preventing coalescence of the two towns.
- 1.9 The Country Park was the subject of S106 agreement when the Business Park was developed and now forms a vital area for relaxation for local residents.
- 1.10 The area between St Albans and Hatfield has already seen considerable development and continues to experience considerable pressures on the Green Belt.

Highways and Transport

- 1.11 The proposed site fails to comply with Hertfordshire Minerals Plan policy 16 as it is not a sustainable site as defined in the policy and is totally reliant on lorry transport.
- 1.12 Being reliant on lorry transport, the proposed site fails to meet HCC policy objective in reducing CO2 omissions. This is exacerbated by the fact that most of Hertfordshire sand and mineral working are centred around the small area between Smallford and Hatfield. This results in increased mileage due to location of a single area, away from the fastest developing areas in Hertfordshire.
- 1.13 Smallford already has an active quarry which adjoins the proposed site and has had so since the 1960s. Therefore, a cumulative impact would arise if permission were granted as this would be contrary to Hertfordshire Mineral Plan policy 11 Cumulative Impact.
- 1.14 We are very concerned that HCC officers failed to request the traffic modelling to include the key junctions on A1(M) and A414 at Hatfield south and north.
- 1.15 This could have very significant impacts across the county and result in drivers using a route through St Albans to avoid the delays, ignoring weight limits.
- 1.16 St Albans Road (A1057) Smallford to Hatfield
- The A1057 already has planning approval for up to 425 HGV movements per day when added with the proposed site 174 would take the quarry related HGV trips up to 599 per day or 1 lorry every 66.6 seconds throughout the working day from 7.00am to 6.00pm. For what is substantially a residential road the impact would be very significant.
- 1.17 Links on strategic road network A1(M) and A414 at Hatfield
- Very significant delays at both Hatfield north and south junctions. These are key junctions for travel in and across Hertfordshire particularly east-west directions.

- 1.18 The evidence also shows there are significant limitations as to what if any improvements or mitigation is possible to reduce delays at these junctions.
- 1.19 St Albans weight limit zone

The proposed site is within the St Albans 7.5-ton weight limit zone.

Cumulative Impacts

- 1.20 The NPPF identifies that cumulative impact is a material consideration when determining mineral applications, and it also indicates that the impacts resulting from such should carry considerable weight when they are considered with other factors.
- 1.21 The Hertfordshire Mineral Plan Adopted March 2007 in 'Policy 11 Cumulative Impact' includes cumulative impacts as a consideration that must be considered.
- 1.22 The policy also continues to state that any development that has unacceptable cumulative impact on the environment of an area, either in relation to an individual proposal, having regard to the collective effect of different impacts, or in relation to the effects of a number of minerals developments occurring either concurrently or successively, will not be permitted.
- 1.23 The same Mineral Plan identifies land at former BAE Hatfield Aerodrome as a preferred site but fails to show any consideration as to how it meets policy objective 11. This is rather alarming considering the proposed site adjoins a large-scale existing site.
- 1.24 The draft Mineral Plan again includes the Former Hatfield Aerodrome site as a preferred site but again fails to state why the proposed site meets the objectives of Policy 13.
- 1.25 Therefore, the reader of either of the above Hertfordshire Mineral Plans would have no understanding if the proposed site meets the Cumulative Impact policies in either document.
- 1.26 Timescales

Neither the NPPF or Hertfordshire Mineral Plans help us when considering timescales over which cumulative impacts should be considered, other than not concurrently or successively in the Hertfordshire Mineral Plan, we have explored possible times.

1.27 As the proposed quarry would result in both concurrent and successive mineral quarrying at adjoining sites, either would fail to meet Hertfordshire Mineral Plan policies, policy 11 adopted, policy 13 draft Minerals Plan.

1.28 When all factors are considered, well over 100 years in and around one small village, there is a long-term cumulative harm.

1.29 Quarrying

All the existing quarrying sites around Smallford have been reviewed and concludes that there has been continuous quarrying and related activities since the 1930s. We believe this is a long-term cumulative impact on the residents.

1.30 Dust

We have considered the evidence from both quarrying and the transport related to such activities.

The assessments are for current levels rather than longer term.

1.31 There is no proof that long term exposure to dust resulting from minerals particularly crystalline silica is safe.

1.32 Traffic

We have reviewed all HGV routes and concluded that most lorries must use one route which is broadly along residential roads resulting in traffic delays, dust and particulates from emissions, causing long term harm to residents in the area.

1.33 Loss of Amenities

The communities of Smallford and Ellenbrook have significant restrictions on areas for exercise and relaxation due to the surrounding built up environment and restrictions on access and activities in other areas surrounding their communities.

1.34 The development of the proposed quarry would result in a very significant reduction in the remaining limited facilities.

- 1.35 As mineral working has taken place within the area since 1930s, not always with highest standard of reinstatement, long term cumulative impact exists on residents.
- 1.37 As stated above a cumulative impact and harm exists, the development of the proposed site would be contra to NPPF and Hertfordshire Minerals Plan policies therefore the appeal should be refused.