

PROPOSED QUARRY AT FORMER HATFIELD AERODROME

Ref: APP/M1900/W/24/3346607

APPELLANT'S REPLY TO CHG CLOSING FOR RECONVENED INQUIRY

<u>Point in CHG Closing</u>	<u>Appellant's Reply</u>
Page 1, "the local population has at the current time unfettered access and can wander the park at will"	This is on a permissive basis, and is subject to the 2000 Agreement as varied which provides for mineral extraction.
Page 1, the scheme is not "substantively different"	The Appellant has explained this in the context of Wheatcroft principles. However, important improvements have been made with significant public access improvements.
Page 2, CHG say "these paths result in users walking along corridors which are encircled by 5 metre high bunds, quarry activities and quarrying infrastructure.... lack of open and uninterrupted views"	This is simply incorrect. That is clear when the paths as plotted on the Public Access Strategy and those are closely considered.
Page 3, "the appellant has acknowledged..... the position of the lagoons is not ideal"	That is not correct. It is agreed with the MPA in the SOCG that the lagoons are in "the preferred location" CD/17.15. The lagoons are in exactly the position the SPG envisages will contain a lagoon and are actually smaller than envisaged by the SPG. It is agreed with the EA that the lagoons are required to be sited in this area.
Page 3, "the bunds that surround them" in relation to the lagoons	Again, this is simply not correct.
Page 3, we are concerned about safety of crossing points.	The safety of crossing points is addressed in Mr Mutch's Proof.
Page 3, "hemmed in by bunds" "noisy, dusty and unattractive quarry workings"	Again, this is simply not correct. This inquiry is not revising the evidence on noise and air quality given at the last occasion.
Page 4, describes the "minor" changes as being limited to phasing	That is not correct. There are new paths, the new access to sub-stages of phases, and new conditions.