

COLNEY HEATH GROUP

Third Party Statement of Case Against Proposed Quarry

Submitted to the Appeal at the request of the Inspector reference APP/M1900/W/24/3346607, Land at former Hatfield Aerodrome.

Ellenbrook Country Park Public Access

- 1 My name is Mike Rawlins, I am a qualified horticulturist specialising in Hardy Nursery Stock Production and Garden Centre Management. I was appointed general manager in 1972 and have remained in a senior management position throughout my working life including regional representative on council of the Horticultural Trades Association. In support of my employer's sales and marketing activities I was also responsible for undertaking a range of gardening and landscape design activities, clients ranged from multinational and UK companies to domestic gardens. Some of the referrals were via the local LPA.
- 2 Since 2015 I have been involved with Colney Heath Parish Council as Neighbourhood Project Plan Officer (voluntary) in preparing a Neighbourhood Plan and supporting the council in wide range of planning related issues. One of tasks included the formal assessment of all undeveloped land within the parish.

Need for public open space

- 3 The health and wellbeing benefits resulting from exercise and relaxing in the countryside are well documented elsewhere. Therefore, I will consider these only in the local context.
- 4 The area surrounding the site has many major transport infrastructure restrictions which result in poor access to the countryside this includes A1(M) and the East Coast Main Line railway, and to a lesser extent the A414 and Coopers Green Lane are barriers to the countryside beyond. Coopers Green Lane, for a substantial amount of its length has no footpath, and together with limited access points from Hatfield or Smallford thus making accessing the countryside to north and northwest difficult.
- 5 The other large-scale open countryside near Hatfield is to the east, surrounding Hatfield House with access only available on payment which is not suitable for all members of the community.
- 6 Hatfield, Sleapshyde and Smallford all have deficiency of public open spaces when assessed using the Field in Trust methodology and standards, ref. CHPC Hatfield Sleapshyde and Smallford Open space Assessment (CDx.xx). The Fields in Trust is the same standard used by the surrounding LPAs. Each community area has been assessed against the required provision and all fail

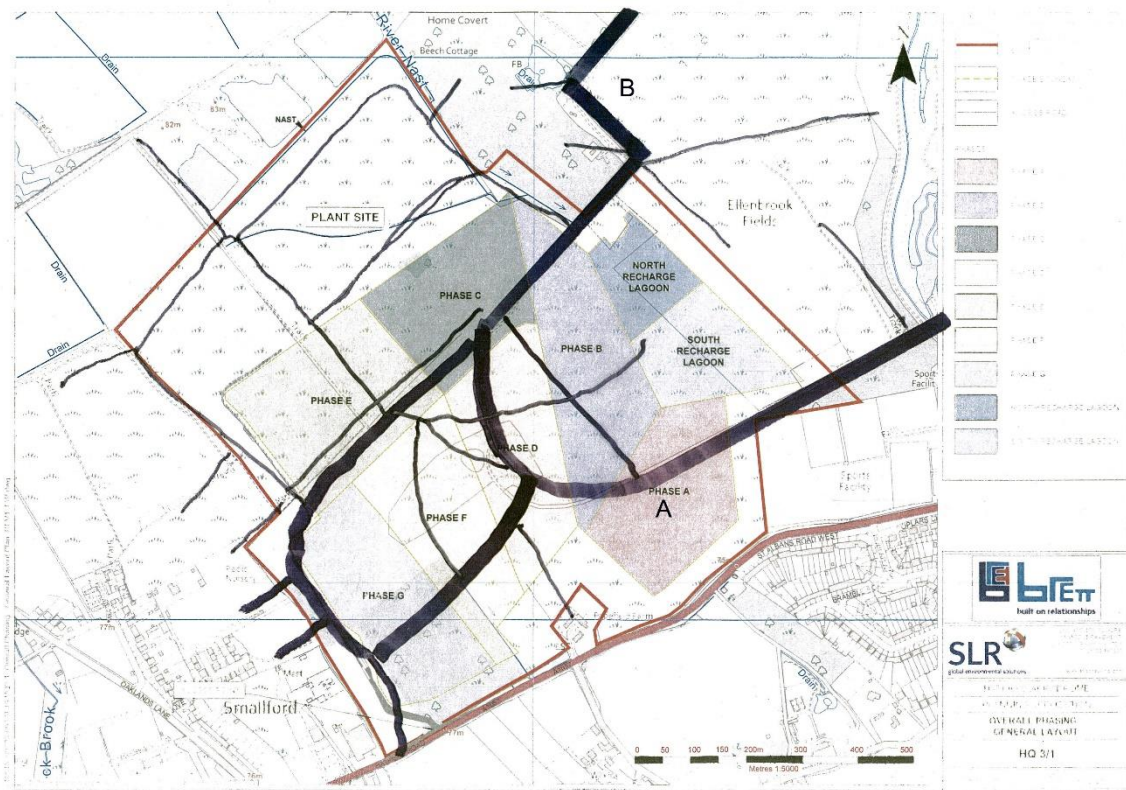
on some or all of the required provision levels. The public open space to the north of Hatfield Garden Village also is at risk from harm due to the adjoining proposed quarry ref. Emerging Hertfordshire Minerals Local Plan (CD3.02). It is reasonable to come to the conclusion that Ellenbrook Country Park plays an important role in providing access to public open space in the area. There being few alternative areas for relaxation and exercise.

User study

- 7 In winter of 2022-23 we undertook a study of users in Ellenbrook Country Park the objective of this study was to understand the level of use and routes used within the park CHPC objection 24/1/2023 and CHPC objection Appendix (CD x.xx). The study period included the Christmas and New Year and period of snow on the ground, this was far from ideal conditions to undertake a study.

Snow tracking

- 8 Following the snow fall (75-100mm) on 11th-12th December 2022 a member of the CHPC team walked and recorded the tracks in the snow over the area of the Country Park included in quarry proposal. This was undertaken on morning of 13th December 2022, so recording approximately 24 hours of activity.
- 9 The level of use was so significant that it was impossible to count the number of people who had travelled along most paths. So, our data is based on an assessment of usage, based on number of footprints observed, width of path, and the level of snow compaction in the path. Key junctions and routes were also photographed to provide additional evidence. Away from the main routes we also observed routes used by a single person or limited number of persons, these were not recorded.



Diagrammatic snow tracked routes 13th December 2022 overlayed the site plan. The wider lines indicate the higher level of usage. Points A, B for following images. The analysis is based on the previous 24 hours level of usage.



13th December 2022 point A on taxiway showing the high level of usage in previous 24 hours.

10 Residents also informed our researcher that a number of people use routes through the Country Park for commuting to and from work which is a sustainable form of transport. Due to the short winter days, we have been unable to quantify this.

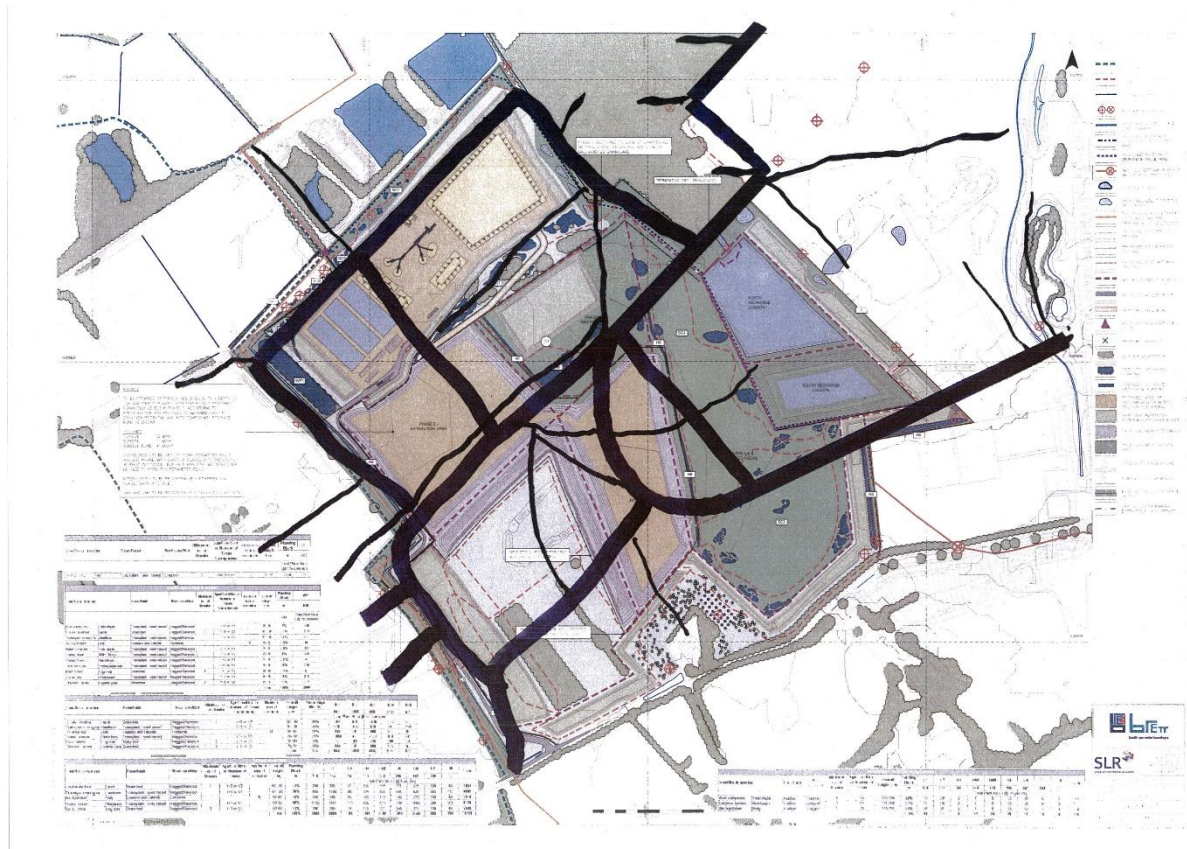
11 The anecdotal evidence would however support resident's comments by-
Level of usage observed in snow tracks along the route near Home Culvert and Round Wood. This was at a much higher level than the user study indicated we should have expected.

Results of the User Study

12 We can be confident that a minimum of 25 people per hour are using the Country Park during the winter months, however this likely to be greater in summer months.

13 From the study we have been able to identify the key access points used when accessing the Country Park. We have also been able to identify the routes which have the greatest level of activity and demonstrated that significant range of other lesser routes are used at significant levels.

14 The largest groups were walkers and dog walkers, with smaller numbers of cyclists, runners. During the study it was noticed that a number of people were using mobility scooters also used the park, however the numbers were low during the study period and the recording only started later in the study.



Diagrammatic map overlay showing the principal routes used during our study period overlaid phase E map. The wider lines are the routes/sections as identified above routes A-H. the narrower lines are more frequently used minor used routes.

- 15 The study data confirms a number of access points to the park the most important being from Salisbury Village Hatfield end, Albatross Way being the most important and at the Smallford end by Notcutts Garden Centre, Jove Gardens and Lawrence Close with the route near Notcutts being the most important. Other entrances are used at lower levels including Pastures View Smallford, Beech Farm and from Coopers Green Lane near the Business Park.
- 16 The most important route is from Albatross Way to Smallford via taxiway and open area. The next most important routes are;
 - Smallford to Hatfield via northern edge of open area then to the taxiway to Hatfield
 - Smallford to Hatfield via northern edge of open area then via front of Home Wood to Hatfield.
 - Along the northern boundary it is unclear if the majority use this circular route or for onward travel due the limited visibility along this route.

The route through the northern grass shrub area also the route of the PoRW, again it is unclear if the majority use this circular route or for onward travel due the limited visibility along this route.

A large number of other lesser used routes also exist.

- 17 The access from northern Hatfield and business park differs between the snow tracking and study data. The conclusion that this could be from early morning dog walkers or people travelling to work as the informal chats with users noted.



Strava walkers data for the last 12 months 2022 (white line indicates the approximate application site area)

- 18 This clearly shows the importance of the Country Park for walkers, the level of activity equals that of any other area which could include commuting to work and school. The area within the Country Park records the wide variation of routes used by walkers.

Proposed Routes

- 19 From a public access perspective, the current proposal is not fit for purpose. The proposed routes are longer, less safe due to poor natural surveillance and less attractive to users CHPC Footpath Assessment (DCx.xx).
- 20 CHPC believe that the applicant has failed to understand why the Country Park is so important to the people of the area. Even when requested by HCC to submit new access plan which meets the requirements, the applicant has chosen to cobble together an access plan rather than re-evaluate the entire site layout.
- 21 *MPA reg25 letter* (CD2.04)

‘The Council adds that the access strategy must provide for unfettered public access to the maximum possible areas of the Park and that the routes must be attractive to users of the Park and delivered to a high standard.’

The Minerals Planning Authority (MPA) reg25 letter makes it clear what is required, this is considered below.

Attractive to users

- 22 Over most of the phases the proposed access routes are simply not attractive to users, due adverse visual impacts, length of route, noise and dust. We have undertaken a detailed assessment of the major routes in the Country Park during each stage or phase, these assessments indicated significantly adverse impacts during every stage ref. CHPC Footpath Assessment (CD x.xx).
- 23 Due to the most frequently used routes between Hatfield and Smallford being beside or between active sites or the processing area, these are also the areas which receive the largest numbers of visitors to the park. The visual impact assessment (CD x.xx) and the footpath assessment (CD x.xx) assess the visual impact as adverse to significantly adverse throughout all stages.
- 24 The length of the alternative routes is of considerable concern, getting to open areas of the Country Park will take so longer, require more effort, along unattractive routes so residents will simply not bother and in turn their health will suffer both their physical and mental. Due to the short lengths of path between bunds and through landscape planting, the level of natural surveillance will also be reduced making it uncomfortable or unsafe for some users.
- 25 Access to open areas may be inaccessible to users in winter-early spring period due to waterlogged ground and or surface flooding. Due to the need to manage the risk to the water from bromate contamination resulting in the need to construct buttresses and seals around each phase.
- 26 The location of the crossing points forms a major restriction for accessing the park, this due to the poor location of these crossing points. CHPC also has concerns over safety and for those with disabilities.
- 27 We know the current construction and state of the existing paths and routes, however the application provides no information on the construction of the paths. The draft conditions state the use of HCC PRow standards however these includes grass paths which following tree and shrub removal in winter months and possible flooding is of considerable concern due to the damage to the existing grass. If granted it is essential that local communities are involved in conditions.

Noise

- 28 CHPC notes that the applicant's data only relates to impact on nearby homes and supplies no data on the impact on users of the Country Park. We can find no detailed assessment of the combined impacts of the Cemex site and the application site. The new noise assessment on the impact at Popefield Farm indicating noise levels above the desirable limits is a significant concern.

Dust

- 29 Dust will of greatest concern during the warmer later spring and summer months when activity in the park is at its greatest and days are longer. Dust from vehicles is clearly a concern but also during evenings and weekends when no staff are on duty to undertake dust suppression measures.

Conclusions – Usage of the Country Park

- 30 CHPC believe these issues are so fundamental they cannot be resolved by way of conditions, the changes required would need to be substantial and therefore effectively form a new application. From the evidence currently available it is unlikely that it will be possible to devise a scheme that is suitable in maintaining access to the Country Park in an attractive and safe manner. The *unfettered* access to the Country Park is required in the S106 agreement.
- 31 The basic site layout including the layout of the phases is fundamentally flawed and not compatible with the need for access to the Country Park. CHPC believe the applicant has chosen to cobble together an access plan rather than re-evaluate the entire site, replan it with access to the Country Park being a material consideration.
- 32 The Location of processing site, the lagoons, bunds and the layout of the phases are all major restrictions to access to the Country Park. The proposed layout means that **all** the key infrastructure and phases block access to the Country Park. The result is that all the currently used major routes are blocked in these proposals. The alternatives proposed routes would be beside a busy main road A1057 or beside the noisy processing area, the noise people come to the countryside to avoid. All the proposed alternative routes during many phases of operation would require significant longer detours to obtain access to the open areas.
- 33 The Country Park is used by a wide range of people with differing needs, some have mobility issues, others wishing to explore the more remote areas. The access to quiet open space either singly or with friends came up many times in the study with residents commenting how important it is for their both physical and mental health.