

Colney Heath Group (CH Group)

Appeal by Brett Aggregates Limited

Land at former Hatfield Aerodrome Hatfield Hertfordshire AL4 0JB

Ref. App/M1900/W/24/3346607

Proof of Evidence - Public Access

M.F. Rawlins

1.0 Executive summary

- 1.01 This Proof of Evidence sets out the CH Group's assessment of the *Public Access Strategy 2026*. Based on site knowledge, the CH Group's 2026 User Study (the only recent empirical study of park usage) and detailed analysis, the CH Group concludes that the Public Access Strategy proposes only minor changes and is fundamentally flawed, unworkable in practice, and fails to meet the requirement for convenient east - west public access and integration into the rest of the park as set out in the SoS letter.

Key Findings

1. Site Layout and Quarry Phasing

- 1.02 The proposed layout -particularly the lagoons, haul roads, and phasing - creates major, long-term barriers to east–west movement, effectively dividing the park into two disconnected halves.

2. Establishment Stage

- 1.03 The strategy provides no explanation of how public access will be maintained during the two-year establishment stage, despite the site being fully encircled. Lagoon construction will permanently block key routes, and the service road will act as a continuous barrier, especially for mobility-impaired users, parents with children, and dog walkers.

3. Impacts During Quarrying

- 1.04 The location of the lagoons represents the worst possible arrangement for maintaining east west access and integration into the rest of the park. They permanently block east–west movement, splitting the park into two disconnected zones. Paths will take long periods to become usable and will also be adversely affected by poor weather conditions. Haul roads, gates, crossing points and fenced buttresses will restrict movement for many years, contrary to the requirement for unfettered access.

4. Drainage Failures

- 1.05 The strategy does not address the significant drainage problems created by clay seals and buttresses. Final restoration drawings show drainage ditches, but none are shown during earlier phases. Large areas of the park will become unusable after rainfall until final restoration, when drainage ditches are proposed. This omission alone renders the strategy unworkable.

5. Pathway and bridleways

- 1.06 Grass paths will take long periods to become usable and will be constantly affected by adverse weather conditions. Although presented as mitigation, the proposed bridleways are either poorly located, delayed, downgraded, or

positioned close to active workings. They do not compensate for the loss of existing routes or the long-term barriers created by quarry operations.

6. Restoration Stage

- 1.07 The final two-year restoration period will result in a second full encirclement of the park, again with no access plan. The installation of drainage ditches at this stage will divide the park into small compartments, reducing connectivity even after restoration.

7. Eastern End of the Park

- 1.08 This area contains two of the most heavily used entrances (Albatross Way and Barlow Hatfield). The former taxiway - an important accessible route - will be reduced by around 60% due to lagoon construction. The narrow grass path proposed through the lagoons does not in any way compensate for the loss of the taxiway.

8. Impacts on Key Routes

- 1.09 The quarry will severely disrupt the park's three current principal east-west routes:
- **Route 1:** Used by up to 50% of all park users; the most critical east west corridor. **Most used route and severely impacted.**
 - **Route 2:** Used by 16–29% of users; intersects quarry phases.
 - **Route 3:** Used by 9.67% of users; affected by cattle field and northern boundary works. **Least used route and least impacted.**

9. Impacts by Phase

- **Worst impacts:** Phases A and B are located in the most heavily used areas, 82% of users pass near these phases. The lagoon path often closed or unusable
- **Next most impacting:** Phase G has no method statement for works, bunds appear/disappear in drawings without explanation
- **Significant impacts:** Phases D and F: Long north-south phases in the central, most used area which affect 79% of users
- **Lesser impacts:** Phases C and E are located further north but Phase E still harms the central bridleway

Overall Conclusion

- 1.10 The Public Access Strategy 2026 does not provide a realistic, workable, attractive, unfettered framework for maintaining east west public access during the establishment, operational, or restoration stages of the quarry. It fails to protect the park's most important routes, ignores real-world conditions

such as drainage and path establishment, mobility needs and would result in repeated, prolonged, and severe restrictions on public access across Ellenbrook Fields. The strategy therefore does not provide a satisfactory solution to the concerns raised by the SoS regarding east west access and integration into the rest of the park.

2.0 Introduction

- 2.01 The CH group believe from a public access perspective the proposed site layout is fundamentally flawed and does not provide for the unfettered access required in 2000 Agreement and MLP Policy 18(x). The 2026 Public Access strategy (CD17.02) only proposes minor changes the most significant being a path between the lagoons. The location of all the quarry related infrastructure and the layout of the phases remains unchanged.
- 2.02 Option 2 in the public consultation document (CD17.02). The CH group did discuss with Brett the reordering and reshaping of the infrastructure and phases as part of the constructive discussions held with them. However, the Brett prepared option 2 does not reflect the CH groups views in any way. As CH groups proposal required a redesign of some phases and infrastructure as well as the reordering of some tasks and phases.
- 2.03 In simple terms CH group proposal was to consider the site in three sections southern quarry area, northern quarry area and processing site. Then to quarry the entire southern area first, then secondly the northern quarry area. Using this approach the entire former southern quarry area would be available for public access at an earlier time and in a beneficial manner. Redesign of phases would be required and changes to the lagoon area to improve access, none of these suggestions are reflected in Brett's Option 2. CH believes that the level of changes required would breach the Wheatcroft principles
- 2.04 The CH groups User Study 2026 is the only study undertaken within the park in recent years, therefore the evidence contained in and analysis resulting from it should carry significant weight in the planning balance in regard to public access.

Establishment stage

- 2.05 The public access strategy (CD17.02) is silent on the establishment stage of the quarry despite it lasting about two years and encircling the entire application site. Importantly no method statement is provided how the lagoons, bunds and paths can be installed particularly at the southern end of the lagoons near the University sports field where the gap is narrower and subject to the greater levels of user activity. Once the lagoons are constructed, they will effectively restrict or block east-west access and the integration of the park for ever. From a public access perspective, the lagoons are in the wrong place as they separate the park into two zones and will always be a barrier to east-west movement, there being few alternative routes.
- 2.06 The plant service road with its crossing points will always be a barrier to cross park travel and accessing the park from the Smallford end. The service road will also prove to be a barrier to accessing the park particularly for those with

mobility issues which accounts for a small but significant number of park users and for people with children, CH Group User Study 2026.

Quarrying Phases

- 2.07 The proposed layout of phases is the worst possible from a public access perspective, due to the orientation and length effectively blocking east-west access and the integration of the park. With only phases D and E having a slightly lesser impact on public access due to their orientation and location being north of the more heavily used areas of the park.
- 2.08 Grass paths will take time to establish and become useable in any area where the land has been subject to soil movement, vehicle movements and / or following the clearance of trees and shrubs. The site becomes very wet now following heavy rain resulting in some paths becoming very muddy and unusable. The buttresses are designed to manage water flow within the quarry area, the use of clay seals within the landfilled areas will also restrict drainage from the site, therefore the lack of a new drainage system following quarrying will make the situation worse. The current proposal indicates that the onsite drainage will be installed during the final restoration phase. Open grass areas may become usable within 12 months following seeding, but paths will take longer to establish. Wider paths are likely to be useable before narrower paths due to the onsite soil conditions as people would be able to avoid the most damaged areas.
- 2.09 The public access strategy does not reflect or indicate the time taken for grass paths to become useable, this is particularly important at crossing points which are all shown as being grass paths, therefore the strategy does not reflect reality.
- 2.10 The haul roads will be a constant barrier to travel within the park and restrict the unfettered access required in the 2000 agreement. The haul roads gates will be significant barrier to those with mobility issues, those with children and for dog walkers as they will need to put their dog on a lead to cross the haul road. The limited number of crossing points also acts as a barrier to unfettered access required within the park contrary to 2000 agreement.
- 2.11 When considering each phase, the construction of buttresses is the first issue as they block access during their construction and the proposed crossing as they are shown as grass paths which will take time to establish and become useable. Due to their depth each buttress will require fencing on safety grounds being up to 10m deep. The public access strategy (CD17.02) shows the buttresses are installed in advance of quarrying that phase e.g. image 5, thereby restricting access within the park for a prolonged period. The buttresses will inhibit the unfettered access required in the 2000 agreement.

- 2.12 The impact resulting from the quarrying of each phase will vary with phases C and E having the lesser impact due to their location and orientation. However, phase E will cause considerable harm to the central bridleway as it passes through that phase and requires a downgraded footpath round the north of the phase. Phases C and E are north of the currently most heavily paths and routes CH group User Study 2026.

Footnote – image x refers to image no. in Public Access Strategy in option 1 (CD17.02).

- 2.13 Phases A and B will have the greatest impact on park access being just south and west of the lagoons and on the most heavily used routes within the park with 82% CH User Study 2026 of users having to pass at either end of these phases, during both working and buttress construction. During much of this time the path between the lagoons will be non-operational due to closure or the grass path as it will be unusable.
- 2.14 The next most impacting phase is G being beside the service road, we have not been provided with any method statement that shows how the works in this area will be carried out. In the Public Access Strategy image 5 a new bund appears but we are provided with no details of routes the vehicles will use or any possible impacts on service road or footpaths. Then in image 27 the bund vanishes, and a new buttress is constructed in its place. Again, we are provided with no vehicles routes or impacts on paths. All the paths from Smallford will run beside the active phase as quarrying continues.
- 2.15 Phase D and F, the phases in the central area will impact cross park travel and the integration of the park due to the orientation being north - south and the physical length of each phase. These phases are within the most heavily used area of the park with 79.33% of park users using this area of the park CH group User Study 2026. The impacts will be first from the construction, then buttresses, then from the active quarrying over a long period of time.
- 2.16 Critical in providing unfettered access within the park is drainage, currently the park becomes very wet and muddy following heavy rain. However, to manage the bromate problem clay buttresses and seals are proposed, these will surround or be below all of the restored phases. The restored phases are east of the natural water flow path, and lower than the western end of the park, and between the main park area and the natural river outlet the Ellen Brook.
- 2.17 The final restoration drawing HQ3/15 (CD17.03.16) clearly shows drainage ditches crossing the site, which is something that is clearly required due to the proposed use of clay buttresses and seals for bromate management and the need for ditches to manage flooding. The public access strategy does not show any ditches prior to the final restoration. Therefore, one must conclude that areas of the park will be inaccessible following heavy rain due to flooding and therefore contrary to 2000 agreement which requires unfettered access to the park and the appellants public access strategy is totally unworkable.

Bridleways

- 2.18 The proposed bridleways with their higher standard of construction could potentially improve east-west access and the integration of the park. However, only the most northern bridleway is open throughout the quarries life, and the CH group user study shows that only 9.67% of park users use any part of this route as the route does not provide a direct route to any more widely used entrances.
- 2.19 The potentially more important bridleway but along a longer and less desirable route is not completed until about year 9, Public access strategy 2026 (CH17.02) image 9. However, this bridleway suffers from poor natural surveillance until the later years of the quarry and is in close proximity to active workings and it will be impacted by the construction of the Smallford end bund in about year 7 (image 5) and the removal of the same bund in about year 27 (image 27).
- 2.20 The middle bridleway, also along a longer less desirable route, is proposed to be completed during the establishment stage but is closed and downgraded to grass path during phase E Public Access strategy 2026 (CH17.02) images 20-25. The concern is that the grass path will be on land which currently has significant shrub growth so the grass path will take time to establish.

Restoration

- 2.21 The Public Access Strategy (CD17.02) is silent on public access during the final restoration stages. This, the second total encirclement of the western end of the park (application site), will last for two years. During the restoration stage the lagoons will be reshaped and partly filled, the bunds and the processing site removed and landscaped, together with the roadways being modified for future use. Also, during restoration very considerable harm will occur to formerly restored quarried areas by the digging of drainage ditches.
- 2.22 The final restoration drawing shows a series of drainage ditches dividing the park into small sections which require crossing, and so reducing access within and across the park.
- 2.23 The proposal indicates that the drainage ditched will be installed at the same time as the final restoration making the park almost unusable with other restoration projects which will encircle the park.

Eastern end of the Park

- 2.24 The Secretary of State's letter requested evidence on this area in paragraph 6a, however this area is beyond the application site. From the CH groups 2026 user study the evidence shows that this area forms a key route into the park with the Albatross Way and Barlow Hatfield being two of the most heavily

used entrances into the park. The user study recorded a number of routes through this area but only two exclusively within this area of the park.

- 2.25 The linear Park loop (green route) only recorded 7.02% of park users using any part of this route and the route to the north eastern corner of park (orange route) only 3.98% of park users using this route. In an open question in the user study people also made comments about the distance and time required to access the northern field.
- 2.26 The cattle field is within this area of the park and does show a lower level of use, currently a factor impacting on use is the number of dog walkers using the park with 59.74% of park users were recorded as being with a dog in CH group user study 2026. With the high number of dog walkers 55.08% recording concerns about their dogs' behavioural issues which also impacts on their choice of route in wishing to avoid cattle.
- 2.27 The former taxiway which offers a high-quality walking and cycling surface for all users is within this area of the park but will be reduced in length by about 60% by the construction of the lagoons. The taxiway also currently offers those with mobility issues a high-quality walking surface.
- 2.28 To summarise the impact of the quarry on key routes across I have undertaken a detailed assessment of each route which is illustrated below. The detailed methodology and scoring are contained in CH group detailed analysis of the proposed access strategy.
- 2.29 The scoring aims to provide a comparison of how the quarry will impact on the use of Ellenbrook Fields during the life cycle of each phase. The initial assessment is based on the current position, right through to post restoration. There is one graph for each of the three main routes.
- 2.30 The scoring, using the methodology described in the CHG detailed analysis of Brett's proposal document shows where and when the most impact will occur. A low score indicates that the quarry has had a significant impact on the east west route across the park.

Route 1

- 2.31 This is the most important route in Ellenbrook Park with about 50% of park users using the eastern end and 21.44% of park users using the western end CHG User Study 2026. The high use of this route is linked to the proximity to residential areas and the limited parking available at Notcutts.
- 2.32 This route forms the most direct route between Salisbury Village and Smallford. The current route leaves Salisbury Village at Albatross Way and quickly joins the wide former taxiway running just north of university sports

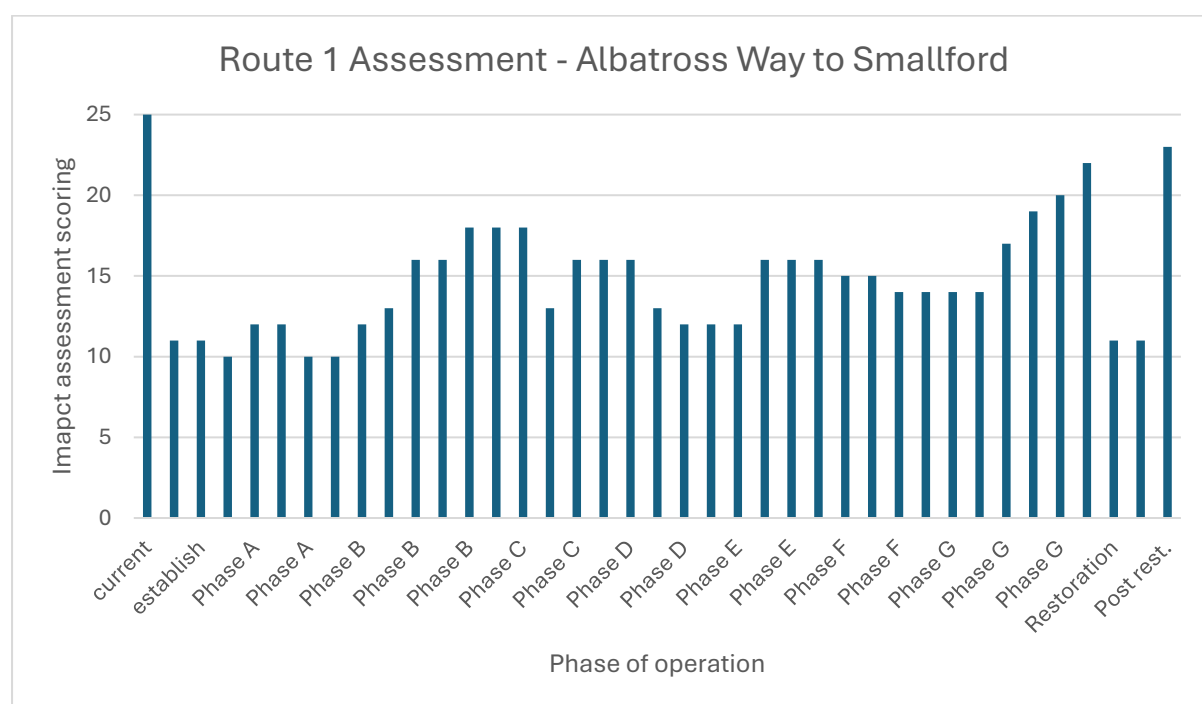
field. Towards the middle of the park the taxiway bends north before ending, at this point walkers use a wide grass path heading towards Smallford. On approaching Smallford the user has the choice of several routes to entrances 2,3 and 4 (appendix 3) Notcutts Garden Centre, Jove Gardens or Lawrence Close, Jove Garden (entrance 3) has been selected as it's the central entrance in Smallford.

2.33 Graph 1 below plots the Route 1 impact assessment score for each stage in the phase (based on the detailed analysis). A low score correlates to an increased negative impact on the users of the park.

2.34 For users of Ellenbrook Fields, the current position (ie no quarrying) Route 1 impact assessment score is 25. During establishment this score falls significantly to 11. It remains low during phase A with a trough of 10, then rises and falls during subsequent phases, with a peak of 22 during phase G, after which during the restoration phase it drops significantly to a score of 11.

2.35 **The establishment and restoration scores are a drop of 14 from the current (no quarry) score of 25. Phase A troughs are a drop of 15.**

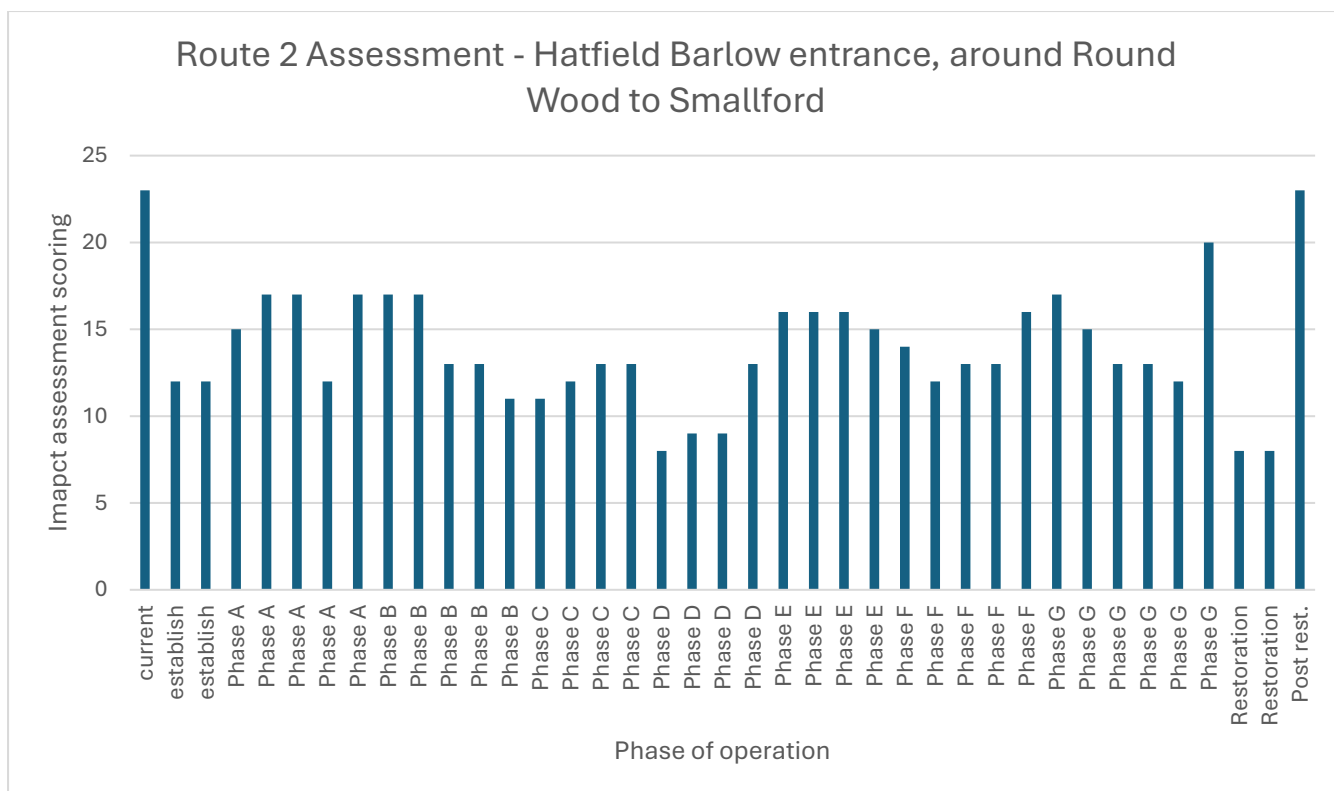
Graph 1 - Route 1 Assessment - Albatross Way to Smallford



Route 2

- 2.36 This route is used by a minimum of 16.32% of park users at western end and to a maximum of 29.4% of park users at the eastern end, CHG User Study 2026.
- 2.37 The current route leaves Barlow area of Salisbury Village via an ungated entrance, then turns right heading north along gravel path for about 110m. At the Hatfield Airfield Memorial, the route is along a wide grass path until a tarmac path is reached. The route follows the tarmac path through two kissing gates until it reaches Round Wood. At Round Wood the surface degrades to compacted gravel, hardcore with intermittent areas of tarmac zig-zigging in front of Home Covert and is approximately 2m wide, by the end of Home Covert the path will be within the application site. From this point onwards the path is heading west towards Smallford. The first part of this section is along raised compacted hardcore overlooking grassland with varying levels of shrubby growing in it. After about 250m the surface path turns south towards the taxiway, the route then follows a wide grass path to Smallford, open grassland to south with mature hedge to north. On reaching Smallford the user has number of routes to select from to reach their final destination.
- 2.38 Graph 2 below plots the Route 2 impact assessment score for each stage in the phase (based on the detailed analysis). A low score correlates to an increased negative impact on the users of the park.
- 2.39 For users of Ellenbrook Fields, the current position (ie no quarrying) Route 2 impact assessment score is 23. During establishment this score falls significantly to 12. It then rises and falls during subsequent phases, with a very low score of 8 in phase D, then improves with a peak of 20 during the last stage of phase G. After which during the restoration phase it drops to significantly again to a very low score of 8.
- 2.40 The restoration score of 8, and the trough in phase D, are drops of 15 from the current (no quarry) score of 23.**

Graph 2 - Route 2 Assessment - Hatfield Barlow entrance, around Round Wood to Smallford



Route 3

- 2.41 This route is used by about 9.67% of all Ellenbrook Park users CHG User Study 2026.
- 2.42 The current route leaves Barlow area of Salisbury Village via ungated entrance, then turns right heading north along gravel path for about 110m. At the Hatfield Airfield Memorial, the route heads west towards the cattle field. Users pass through a kissing gate to enter and leave the cattle field. The route passes in front of Round Wood for about 120m before heading north beside Home Covert. At the north boundary of the park the route turns left heading west on reaching the edge of the application site (entrance 6) users can continue to Oakland Lane or walk through the former BT trials site to Smallford.
- 2.43 Graph 3 below plots the Route 3 impact assessment score for each stage in the phase (based on the detailed analysis). A low score correlates to an increased negative impact on the users of the park.
- 2.44 For users of Ellenbrook Fields, the current position (ie no quarrying) Route 3 impact assessment score is 22. During establishment this score falls significantly to 8. It then rises and remains fairly steady during subsequent phases until the restoration phase where it falls significantly with a very low score of 7. A score of 7 is the lowest score across all routes.

2.45 The restoration score of 7 is a drop of 15 from the current (no quarry) score of 22.

Note that this route is the least used area of the park based on the Colney Heath survey and is the furthest away from the residential areas.

2.46 Graph 3 Route 3 Assessment - Hatfield Barlow entrance, around the top of the processing site to Oaklands Lane

