Colney Heath Parish Council (CHPC)

Proof of Evidence
Green Belt

Witness M.F. Rawlins

1 Introduction

1.1 All the proposed site is currently in the Green Belt. Part of Smallford village is identified in the emerging St Albans Local Plan as Green Belt settlement envelope, in the current proposals this does not adjoin the proposed site but is close by.

1.2 The Dacorum, St Albans and Welwyn Hatfield joint Green Belt review contains an assessment of this area, it was completed in 2013 but no significant changes have occurred in the area surrounding the site since 2013.

1.3 The Hertfordshire Landscape Assessment was undertaken 2000-2005 therefore pre-dates some recent changes.

2 Planning Policy

2.1 National Planning Policy Framework (NPPF) July 2021

150. Certain other forms of development are also not inappropriate in the Green Belt provided they preserve its openness and do not conflict with the purposes of including land within it.
These are:
a) mineral extraction;
b) engineering operations;
c) local transport infrastructure which can demonstrate a requirement for a Green Belt location;
d) the re-use of buildings provided that the buildings are of permanent and substantial construction;
e) material changes in the use of land that would preserve the openness of the Green Belt and not conflict with the purposes of including land within it (such as changes of use for outdoor sport or recreation, or for cemeteries and burial grounds, so long as the development would preserve openness); and
f) development brought forward under a Community Right to Build Order or Neighbourhood Development Order.

2.2 The NPPF is clear that mineral quarrying is not inappropriate in the Green Belt provided it preserves the openness and the purposes of the Green Belt. We need to consider both aspects in the assessments.

2.3 'HERTFORDSHIRE MINERALS LOCAL PLAN REVIEW 2002-2016 Adopted March 2007

A2.4 The settlement pattern of the sand and gravel belt is such that remaining known resources are often in close proximity to the urban areas. If these resources are to be extracted, it is essential that the afteruse takes account of the proximity of the urban area. Most of the gravel belt outside the towns is designated Green Belt. Although not a constraint in terms of national policy, in 48 Green Belt situations the overriding consideration must be the appropriate afteruse and the restoration process which leads to it.'

2.4 The Hertfordshire minerals Plan does not assist in Green Belt policies but rather highlights post quarrying reinstatement. We should also read it with cumulative impacts on residents of the area.

3 Character of proposed site

3.1 The proposed site has conveyers and infrastructure for the Hatfield quarry to the north, Hatfield Business Park to east, St Albans Road (A1057) to south and the village of Smallford to west.

3.2 All the boundaries are tree and mature hedgerow lined, resulting that site is contained, views beyond the site are generally intermittent.

3.3 The site is broadly level and flat with varying levels of open space, trees and shrubs. The species reflect those commonly found within the parish of Colney Heath, Oak being the dominate large tree with smaller numbers of ash, willow, and silver birch. The shrubs are nominated by hawthorn, sloe and blackberry again typical of the parish.

3.4 The trees are of a maturity that restricts long sightlines and are limited generally to 300-400m but some longer vistas and larger open spaces also exist. The density and maturity of shrubs does much to reduce the noise from the St Albans Road (A1057) and the nearby Hatfield quarry.

3.5 The area is intermittently overlooked by the university buildings and homes and buildings on the Hatfield Business Park. The two urbanising features impacting localised areas are the floodlights of the university sports field and processing plant of Hatfield quarry, otherwise the entire site has strong rural feel.

Location N taken 15/10/2021 Nikon D3400 focal length 18mm

Location C taken 15/10/2021 Nikon D3400 focal length 18mm

The conveyer system related to Hatfield quarry. This is the only crossing within the area so separating the site from the countryside to the north. The alternatives are via Oaklands or Coopers Green Lanes.

Location K taken 15/10/2021 Nikon D3400 focal length 24mm

The university sports field flood lights which have a slight urbanising influence when in the area in close proximity to the sports field.

Location T taken 15/10/2021 Nikon D3400 focal length 170mm

3.6 The processing plant related to Hatfield Quarry (Cemex) near Oaklands Lane Smallford, this is slightly below the level of main site and also benefits from mature tree and shrub screening which appear to date to the establishment of the site in 1960s.

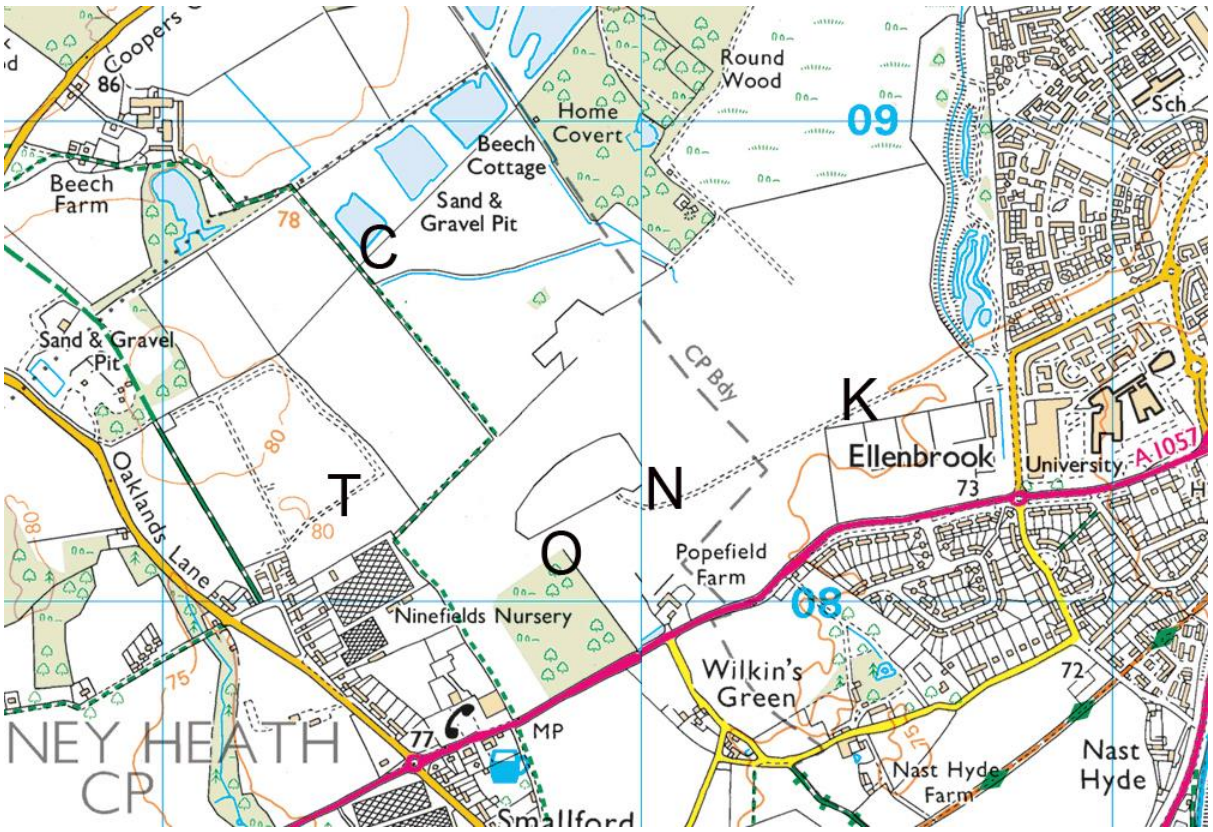
3.7 Access to the appeal site is via a concrete roadway from Hatfield Business Park and a crossover of the brook by Hatfield Aerodrome Memorial at the eastern end. At the western end of the site several paths lead from Smallford village onto the site.

Location N taken 15/10/2021 Nikon D3400 focal length 27mm.

3.8 In the centre of the site are piles of construction waste which are now mostly grown over or screened by vegetation.

Location O taken 15/10/2021 Nikon D3400 focal length 30mm

3.9 This image shows one the larger more open areas but still shows significant well established internal screening within the site.



Map showing location of image reference points.

3.10 The area is popular with residents from Ellenbrook, Smallford and Hatfield due to the limited access to alternative areas for relaxation and exercise. The surrounding area is restricted due to highways infrastructure, built environment and the large private estate of Hatfield House. Due to the current open access to the entire site it has many heavily used footpaths which are popular with both dog walkers and walkers.

3.11 This forms a significant function in maintaining the openness of the area thus meeting the objectives of Green Belt policy.

3.12 Visual assessment along A1057

This assessment was undertaken as the other documents were divided along the A1057 therefore this assessment brings together both sides of the road.

Hatfield Road (A1057) between Lyon Way and Acrewood Way St Albans 16/10/2021

3.13 The A1057 on its southern side has continuous development from Central St Albans to the eastern side on Lyon Way.

3.14 A small gap of 77M exists which already has planning consent for glasshouses (St Albans 5/2017/2232) followed by glasshouses to Station Road.

3.15 The Glasshouses are known as Glinwells and already have a farm shop on site therefore could be regarded as brown field site and so could lead to redevelopment.

3.16 The glasshouses adjoining Station Road are currently screened by Leyland Cupressus (Cupressocyparis leylandii) which is non-native and comparatively short lived, but currently forms a screen.

3.17 From Station Road to the edge of Smallford is mixed development including houses, a filling station and public house.

St Albans Road (A1057) between Smallford and Ellenbrook taken 16/10/2021

3.18 Open fields adjoin the A1057 (St. Albans Road West) from the edge of Smallford to the community of Ellenbrook. Once into the community of Ellenbrook the development is then continuous into Hatfield.

Hatfield Road (A1057) Poplars Close Ellenbrook taken 16/10/2021

3.19 The A1057 (Hatfield Road) north side has continuous development from central St Albans to Wynchlands Crescent, then undeveloped until Oaklands Lane Smallford. This undeveloped area is part of Oaklands College and is a mix of sports fields, agriculture, and woodland.

3.20 The area north of the A1057 in Smallford is dominated by a garden centre (Notcutts) with its buildings and car parks. The northern side is currently largely undeveloped until the University sports fields and then University buildings on the edge of Hatfield. Within this sector is Popefield Farm, the building is set back from the road and are well screened.

3.21 The NPPF does not give a distance to prevent coalescence of towns therefore the visual test could be applied. When driving between St Albans and Hatfield the over whelming impression is of an urban continuous landscape except the small area rural between Smallford and Ellenbrook.

3.22 If the quarry site is developed the proposed road junction and turn-in urbanises the road between Smallford and Ellenbrook and the industrial processing area reduces the gap between St Albans and Hatfield. Post

quarrying the industrial area becomes a brownfield site therefore open to redevelopment.

3.23 Applying the visual test, the proposed changes to the highway from the turn into the quarry would result in a very significant urbanising influence and therefore a significant impression of the merging of the two towns.

3.24 Station Road-Smallford Lane - from the centre of Smallford village A1057 roundabout to former railway bridge Station Road is of urban character with dwelling's east side. The west side has glasshouse and trees interspersed with houses until the rail bridge.

3.25 Once on the bridge for about 350m the road has rural feel before impact of Industrial Estate and Sleapshyde residential area changes again to a more urban character.

3.26 Oaklands Lane is of broadly of rural character with most of the houses screened from the road until the developments of Jersey Farm and Oaklands Grange. The Cemex site is situated to the northeast of the road but screened from the highway.

3.27 Due to the flat ground surrounding the site any buildings and soil bunds would be visible from distance again negatively impacting on openness of area and giving a more urban Character.

3.28 This assessment assists in understanding the perception of separation between the communities of St Albans-Smallford- Ellenbrook and Hatfield. The current gap is 1.3km but would be reduced by the proposed site entrance gates and signage. The gaps between Smallford-Sleapshyde and Colney Heath again are marginal at less 400m between each community.

3.29 The large often illuminated business signs have a greater urbanising impact beyond communities by virtue of size, colour, and lighting.

4 Impact on the Green Belt.

4.1 The proposed area forms a key gap between St Albans and Hatfield thus preventing coalescence of the towns, The National Planning Policy Framework (NPPF) para 138b - to prevent neighbouring towns merging into one another.

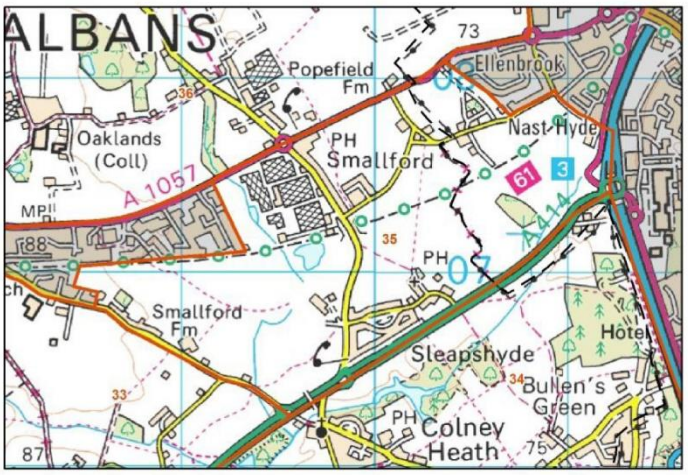
4.2 GREEN BELT REVIEW PURPOSES ASSESSMENT

(Prepared for Dacorum Borough Council, St Albans City and District Council and Welwyn Hatfield Borough Council)

Annex 1 – Parcel Assessment Sheets for Welwyn Hatfield Borough Council

November 2013 by SKM

"*GB35 –Green Belt Land between St Albans and Hatfield (Smallford)*

Description The parcel is located to the east of St Albans and the west of Hatfield. The boundary to the south follows the North Orbital A414 to the north follows the Hatfield Road. It is 250 ha in size and forms a virtually flat clay plain.	

4.3

Principal Function / Summary
Significant contribution towards preventing merging (of St Albans and Hatfield) and maintaining the existing settlement pattern (providing gaps between St Albans and Hatfield with Smallford and Sleapshyde). Partial contribution towards

preserving the setting of Sleapshyde. Overall the parcel contributes significantly towards 2 of the 5 Green Belt purposes.

4.4

GB35 – Green Belt Purposes Assessment	Contribution
To check the unrestricted sprawl of large built-up areas	**LIMITED OR NO**
The parcel is located away from large built-up areas of London, Luton and Dunstable and Stevenage. It does not form a connection with a wider network of parcels to restrict sprawl.	
To prevent neighbouring towns from merging	**SIGNIFICANT**
The parcel provides a strategic gap to separate St Albans and Hatfield. The gap is 1.2km and has been subject to ribbon development extending from St Albans along the Hatfield Road including the village of Smallford and associated development including industrial and commercial activities and housing in the Green Belt. There is also ribbon development in the form of large housing along Colney Heath Lane extending southeast from St Albans, and along Wilkins Green Lane close to Ellenbrook to the west of Hatfield. Any small scale reduction in the gap would be unlikely to further compromise the separation of settlements in physical or visual terms however it would negatively impact on overall visual openness. This is because there is already relatively significant ribbon development along the Hatfield Road and therefore the perception of the gap is limited.	
To assist in safeguarding the countryside from encroachment	**LIMITED OR NO**
The parcel displays mix of strong urban and rural and countryside characteristics due to significant encroachment. It contains medium scale arable fields with hedgerow boundaries and hedgerow trees, as well as areas of heath, semi natural grassland and ponds at Smallford gravel pits. However there is significant built development at Smallford, Sleapshyde and the edge of St Albans and Hatfield resulting on encroachment into open countryside. Therefore settlement boundaries display strong urban fringe characteristics. In particular, Hatfield urban edge, especially along Ellenbrook Lane and close to Great Nast Hyde House, exhibits a greater sense of localised landscape enclosure as a result of the influence of existing residential edges and development and activities in the Green Belt. Therefore levels of visual openness are mixed throughout the site due to contrasting characteristics.	
To preserve the setting and special character of historic towns	**PARTIAL**
The parcel contains Sleapshyde Conservation Area. The Green Belt acts as an immediate open and rural historic setting, providing views to and from the countryside. Due to scale of the feature this is noted as a partial contribution.	
To maintain existing settlement pattern	**SIGNIFICANT**
The parcel provides primary local gaps between St Albans and Hatfield with Smallford (3rd) and Sleapshyde (3rd). Both gaps are approximately1.2km and 0.5km respectively. The gap to St Albans is especially narrow and there is limited perception of the gap and openness from the main routes due to scattered and ribbon development. Any reduction in gaps, especially to the west, would further compromise the separation of settlements in physical and visual terms, or overall visual openness.	

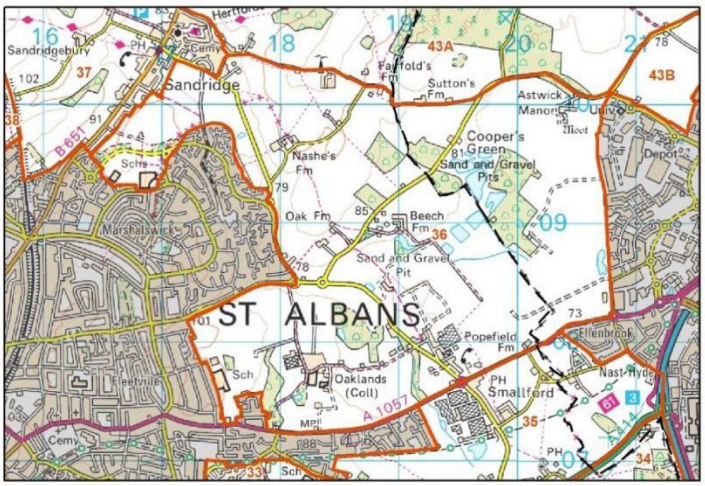
4.5

Level of openness and countryside character
Existence of built development *The level of built development is high at 1.1%. There is evidence of ribbon development along the A1057 Hatfield Road at Smallford, including nursery buildings as well as commercial and industrial development.*
Visual Openness *There is a network of hedges, field trees and tree belts to the urban areas that visually contain the largely arable character.*

4.6

GB36 –Green Belt Land between St Albans and Hatfield (North)

Description The parcel is located to the east of St Albans and the west of Hatfield. The boundary to the south follows the Hatfield Road / St Albans Road West and to the north aligns with Woodcock Hill / Coopers Green Lane to Sandridge. It is 864 ha in size and forms an extensive flat clay plain, more undulating to the north.



4.7

Principal Function / Summary
Significant contribution towards preventing merging (of St Albans and Hatfield), safeguarding the countryside and maintaining the existing settlement pattern (providing the gap between St Albans and Sandridge). Overall the parcel contributes significantly towards 3 of the 5 Green Belt purposes.

4.8

GB36 – Green Belt Purposes Assessment	Contribution
To check the unrestricted sprawl of large built-up areas	**LIMITED OR NO**
The parcel is located away from large built-up areas of London, Luton and Dunstable and Stevenage. It does not form a connection with a wider network of parcels to restrict sprawl.	
To prevent neighbouring towns from merging	**SIGNIFICANT**
The parcel provides the strategic gap to separate St Albans and Hatfield. The gap is 1.2km. It is large and generally well maintained (relatively free of development), in comparison to GB35. However it is subject to development at Oaklands College and ribbon development at Smallford. There is a strong visual perception of the Green Belt from the Hatfield Road. Any reduction in the gap, assuming it is located away from Smallford, would be unlikely to further compromise the separation of settlements in physical or visual terms, or overall levels of visual openness.	
To assist in safeguarding the countryside from encroachment	**SIGNIFICANT**
The parcel displays typical rural and countryside characteristicsin largescale arable fields with hedgerow boundaries and hedgerow trees and is interspersed by woodland blocks with areas of ancient woodland to the north. There is a parkland landscape at Oaklands College with substantial areas of playing fields. There is evidence of urban features, especially at the former Hatfield aerodrome which is partially redeveloped with a new business park including visually dominant buildings. To the west there is a mix of urban fringe development as Oaklands College has recently been subject to expansion, representing further development in the Green Belt. The west part of the parcel, which contains development in the Green Belt, is enclosed by the St Albans settlement boundary on three edges. It therefore exhibits strongest levels of urban influence and represents a more enclosed area of land especially along Sandpit Lane and House Lane. Therefore levels of visual openness vary throughout the parcel but are high in general.	
To preserve the setting and special character of historic towns	**LIMITED OR NO**
The parcel does not provide setting for any historic places.	
To maintain existing settlement pattern	**SIGNIFICANT**
The parcel contributes with GB37 to the primary local gap to separate St Albans and Sandridge (3rd). This gap is narrow at 0.4km and ribbon development is evident between the settlements along St Albans Road, at Sandridge, and therefore there is limited perception of the Green Belt. Any reduction in the gap would be likely to compromise the separation of settlements in physical and visual terms, or local levels of visual openness.	

4.9

Level of openness and countryside character
Existence of built development *The level of built development is low at 0.7%. There is evidence of ribbon development on the A1057 Hatfield Road at Smallford*

with commercial buildings, nurseries and the large development at the Oaklands campus.
Visual Openness *There is a network of hedges, field trees and tree belts that visually contain the largely arable character. Around the Oaklands and Hatfield aerodrome sites views are more open.*
Countryside Character *The parcel is unified by the level topography yet has a diverse mix and incoherent pattern of uses with the semi urban campus developments dominating"*

4.10 The combined LPA Green Belt Purposes Assessment, this independent work carried out by SKM has considered all the factors within Green Belt policy and has identified area 36, the appeal site as offering a significant contribution to three purposes.

Preventing neighbouring towns from merging
To assist in safeguarding the countryside from encroachment
To maintain the existing settlement pattern

5 Character of the gap between St Albans and Hatfield

5.1 The local Hertfordshire Landscape Assessments areas 30 and 31 are also divided along the St Albans Road (A1057) rather than combining both sides in a single assessment.

5.2 Hertfordshire Landscape Assessment area 31 De Havilland Plain c2005
This assessment includes the appeal site.

LANDSCAPE CHARACTER

An area dominated and unified by the level topography yet with a diverse mix of uses and an incoherent pattern. To the north, arable cropping dominates, with open views, very few hedges or trees and only isolated farms. To the centre, the disused Hatfield aerodrome and the new business park have visually dominant structures, together with areas of existing and redundant mineral extraction. To the south there is a mix of extraction, urban fringe development and Oaklands College, which has a disjointed and mixed character. There is generally poor access within and to the area.

5.3 VISUAL AND SENSORY PERCEPTION

This is largely an open and exposed landscape which nonetheless has a private and remote feel in places. It is clearly visible from a number of more elevated locations outside the area. Within the area there are views of the arable landscape from the local roads, including Coopers Green Lane and Green Lane. To the middle, tall hedges, crude earth bunds and modern built development restrict or frame views of this rather incoherent landscape. Within Oaklands many of the views are contained.

5.4 Rarity and distinctiveness. The area is most unusual due to its flatness and open character.

5.5 *VISUAL IMPACT*

The major intrusive built elements within the area are the Hatfield Business Park warehouses. Other significant features are to the eastern fringes and include the former De Havilland flight sheds and control tower. Localised items are the batching plant on Oaklands Lane, glasshouses and nurseries.

5.6 *Over much of the area there is a sense of semi dereliction or poor management. There has been extensive land-use change and little of the original pattern remains. Changes have been from arable to mineral and also from mineral to arable and pasture. Some of the workings are poorly screened.*

5.7 This assessment assists in understanding the character of the site and its contribution to the local landscape. It should be noted this work was carried out 2000-2005 so some changes have occurred. The most significant is the plant growth which has changed the screening and character of some areas.

6 Development of Evidence for Welwyn Hatfield Local Plan: Green Gap Assessment Final Draft Report

Prepared by LU August 2019

6.1 Area between Hatfield St Albans p67

Gap Size, Character and Strength

This is a large gap that exceeds a distance of 3km in places. The smallest part of the gap is around 1.3km along the Hatfield Road (A1057) and the village of Smallford (and its adjacent glasshouses) lies within this gap reducing the perception of separation further. Nevertheless, the two settlements of Hatfield and St Albans retain separate identities and the presence of Ellenbrook Fields country park, blocks of woodland and undeveloped slopes are strong features that ensures there is perception of leaving one settlement and travelling to another when using the roads and footpaths between the two. The two settlements are not currently inter-visible with each other. The gap is vulnerable to being eroded by further development, such as has already occurred along Hatfield Road and within Sleapshyde, although current planning permissions typically consist of alterations to existing dwellings rather than new dwellings.

6.2 Landscape Sensitivity Welwyn Hatfield Borough's part of the gap occupies Landscape Character Areas (LCA) 30 Colney Heath Farmland and 31 De Havilland Plain. The evaluation, as set out in the Landscape Character Assessment, is to 'improve and conserve' the landscape within area 30, and 'improve and restore' the landscape within area 31.

6.3 The landscape sensitivity assessment subdivides these character areas into assessment parcels. Sub areas 30, 31 and 31a fall within this gap. With regards to the role of these areas providing a setting to settlements, deciduous woodland and mature hedgerows in sub-area 30 provides some rural setting to Hatfield as does Ellenbrook Fields country park in sub-area 31a.

6.4 The landscape sensitivity of sub-area 30 is described as moderate as although reduced by the surrounding major road network, the simple and flat landform and the sense of enclosure created by mature hedgerows and trees, there are a number of valued features including the presence of priority habitat deciduous woodland (which creates a buffer to the edge of Ellenbrook and enhances rural character), the historic character of built development along Wilkin's Green Lane, the rural character of the lanes along the settlement edge and the presence of the Alban Way long distance recreational route.

6.5 The key sensitivities are:

- *The areas of priority habitat deciduous woodlands*
- *The historic buildings off Wilkin's Green Lane*
- *The rural character of Wilkin's Green Lane and Ellenbrook Lane; and*
- *The Alban Way Long Distance Footpath.*

6.6 The landscape sensitivity of sub-area 31 varies between low-moderate in the northern part of the area given the evidence of mineral extraction which has altered the field pattern and limited the coverage of habitats, and moderate in the southern part where much of the land has regenerated to form more important habitats. The key sensitivities are:

- *The pockets of priority habitat deciduous woodlands, as well as other large areas of semi-natural or restored habitats associated with past mineral extraction*
- *Rural character*
- *Visually prominent areas comprising an open character; and*
- *Listed buildings and their rural setting.*

6.7 The landscape sensitivity of sub-area 31a also varies between low-moderate in the northern part of the area due to the visible urban edge influences of Hatfield Business Park and busy roads and moderate in the southern part which contains Ellenbrook Fields country park, valued for its parkland vegetation, woodlands, recreation and with some heritage interest as it is located on the site of the former Hatfield Aerodrome.

The key sensitivities are:

- *Visually prominent areas that have an open character*
- *Extensive public access in this area; and*
- *Priority habitat deciduous woodland as well as other small copses.*

6.8 Analysis of Gap Value and Opportunities:

Ecological, Cultural Heritage and Habitat Networks

There are a number of Local Wildlife Sites between the two settlements and within the Welwyn Hatfield Borough part of the gap: Sleeve Hall Wood, Home Covert & Round Wood and Copse at Nast Hyde. Priority habitats include scattered deciduous woodland and a traditional orchard at Great Nast Hyde House. A Network Enhancement Zone 1 (mapped by Natural England) lies between the settlements at Colney Heath although this is outside Welwyn Hatfield's administrative boundary. The Herts Ecological Network data indicates that the areas within Welwyn Hatfield Borough's part of the gap have a medium/high priority for habitat creation, particularly in relation to enhancement of acid grassland and broadleaved woodland. There are some scattered listed buildings/ structures (such as a listed cottage, manor house, and farm buildings) and an area of archaeological significance at Astwick Manor.

6.9 Analysis of Gap Value and Opportunities:

Recreation The area of this gap that falls within Welwyn Hatfield Borough contains recreational value in the form of the Alban Way Long Distance Footpath, national and local cycle paths, and the Hertfordshire Sports Village at Ellenbrook. Informal recreation opportunities also exist within Ellenbrook Fields country park which contributes to the recreational value of the area. There could be an opportunity to improve the footpath and cycleway network in the area.

6.10 Pressure on the Gap and Potential Impact of Promoted Sites on the Gap

There are no site allocations in this area, although there is a draft allocation in the emerging St Albans Local Plan 'East of St Albans'. There are a number of

promoted sites from the Council's 2019 Call for Sites along the western edge of Hatfield: Hat2 Land west of Hatfield, Hat19 Land off Bramble Road, Hat3 Land at Great Nast Hyde, Hat 4 Land at Wilkins Green Lane, and Hat9 Roehyde. If these sites were to be developed this would extend the western edge of Hatfield further into the surrounding countryside, and the Land at Great Nast Hyde would extend development further west towards Smallford. Although there is a clear gap between Hatfield and St Albans across much of the area, the gap between Hatfield and Smallford is vulnerable and development of these sites will almost join Hatfield to St Albans.

6.11 *The whole of the area to the west of Hatfield that lies within the Welwyn Hatfield Borough boundary could form part of a 'gap policy area'. This area is illustrated on Map 2 and within it the aims should be to:*

- *Maintain a physical and visual separation between the two settlements, avoiding scattered and ribbon development along the connection roads that could erode the gap. This is particularly pertinent between the edge of Smallford (St Albans) and Ellenbrook (Hatfield)*

- *Protect existing features of ecological interest including the traditional orchard at Great Nast Hyde House and the scattered deciduous woodlands, seeking opportunities to extend and link these features where possible*

- *Improve habitat provision throughout the area, particularly acid grassland and broadleaved woodland*

- *Preserve the character of Ellenbrook Fields country park and its role as a recreational resource*

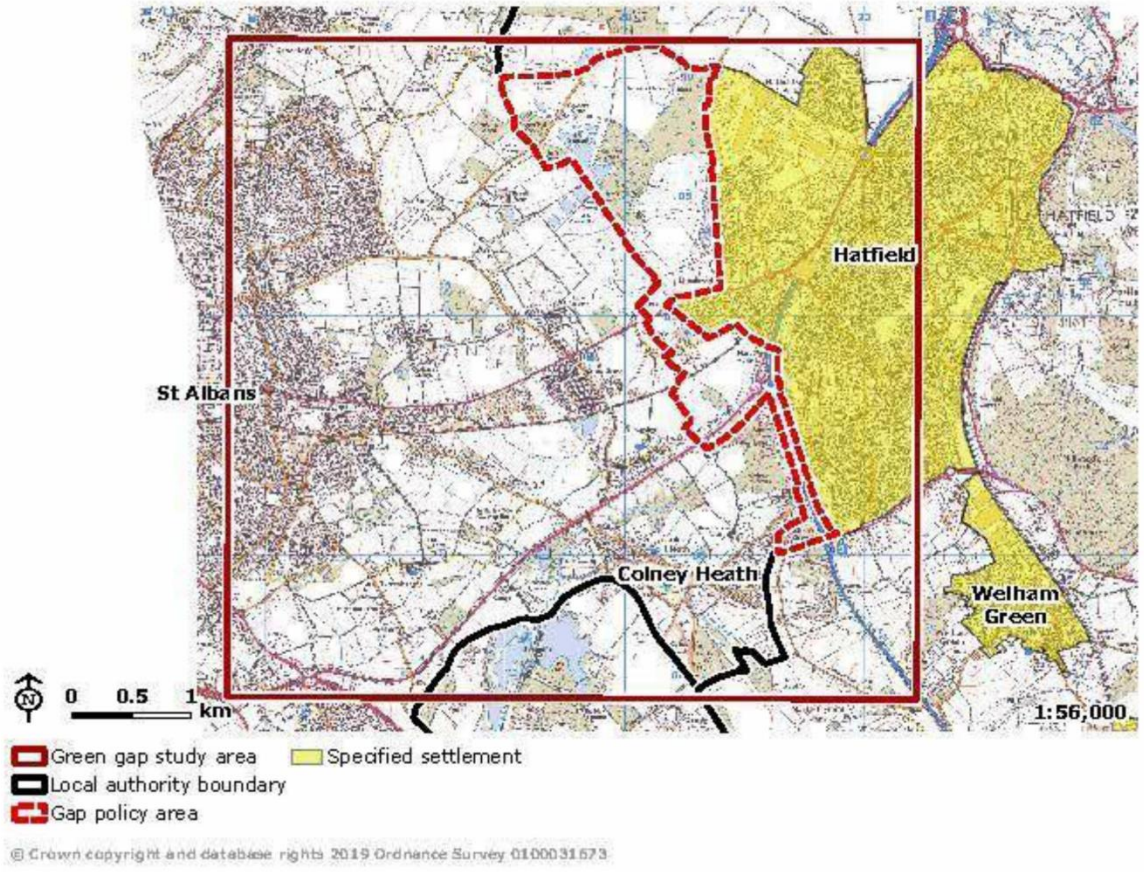
- *Ensure the area within the gap continues to provide a rural setting to Hatfield*

and

- *Maintain public access to and across the area, seeking opportunities for further public rights of way.*

6.12 This report demonstrates the importance of Ellenbrook Fields as an open space for the residents of the area and the critical importance of avoiding ribbon development between the two settlements.

Map 2: Area in which impact of development on settlement separation should be a consideration



6.13 This Gap assessment from Welwyn Hatfield draft Local Plan identifies that some development could be possible the area bordering Hatfield but clearly shows the importance of the bulk of the site in maintaining the gap between Hatfield and St Albans.

6.14 HCC Draft A414 Corridor Strategy 2018 Segment 7: St Albans-London Colney-Hatfield

St Albans and Hatfield are two of the largest settlements on the corridor and quite closely spaced. They are primarily linked by the A1057 Hatfield Road, the Alban Way cycle route and the A414 dual carriageway. The A1057 is characterised by ribbon development on either side, including residential and commercial properties, meaning that it is harder to distinguish the outer suburbs of St Albans from those of Hatfield.

6.15, We have included this as its slightly different approach by highways engineers but they still come to the same conclusions.

6.16 Pressure of the Green Belt

Development of Evidence for Welwyn Hatfield Local Plan:

Green Gap Assessment Final Draft Report Prepared by LUC August 2019

1.28 Gap between Hatfield and St Albans

'Although there is a clear gap between Hatfield and St Albans across much of the area, the gap between Hatfield and Smallford is vulnerable and development of these sites will almost join Hatfield to St Albans.'

6.17 Neither St Albans nor Welwyn Hatfield have a current up to date Local Plan. Both councils are currently preparing new Local Plans.

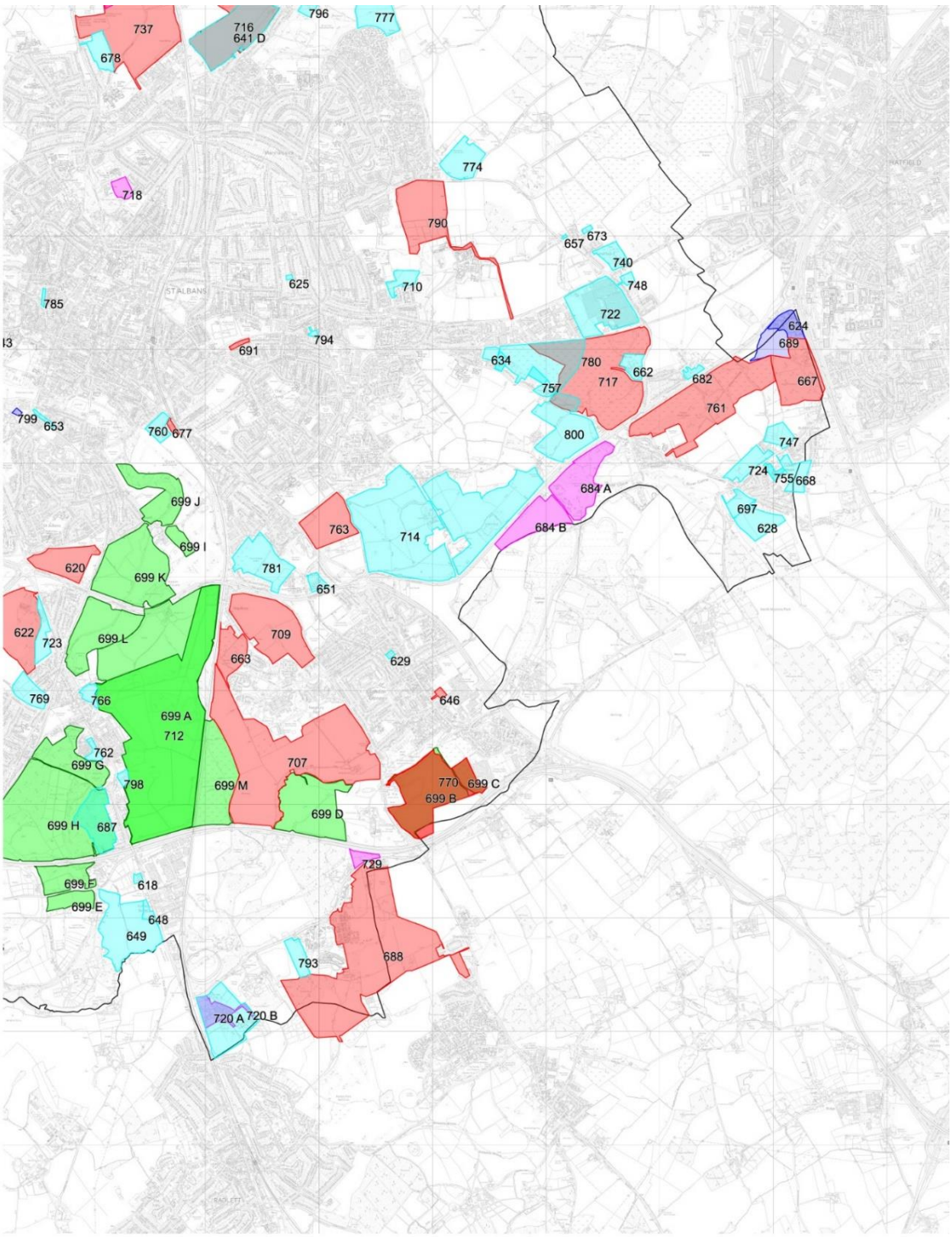
6.18 As part of the local plan process a call for sites was made which resulted in a considerable number of sites being promoted within the area, from Potters Bar to Hatfield and to Welwyn Garden City, Hatfield to St Albans.

6.19 The Welwyn Hatfield Local Plan is at reg.22 the inspector has identified a short fall in housing numbers proposed in the Plan and has requested that additional sites are proposed.

6.20 The Site known as Hat2 (map below) is being proposed for residential use this site is between the business park and proposed quarry site so would significantly reduce the gap between Hatfield and St Albans. It would also mean housing within a few metres of an active operating quarry for some 40 years.

Image from Arlington Hatfield Aerodrome – Garden Village consultation 2018 showing master planning site layout.

6.21 Following the inspector's decision at Roundhouse Farm Bullen's Green Lane (ref no. 3265925 326592) for development of land in the Green Belt due to the lack of housing the districts, other sites are being brought forward for housing again applying pressure on the gaps between the towns.



Call for Sites 2021 - Site Submissions

Key:

- Housing
- Employment
- Strategic Rail Freight Interchange (SRFI)
- Other Uses
- Housing Led Mixed Use
- Employment Led Mixed Use

St Albans City & District Council

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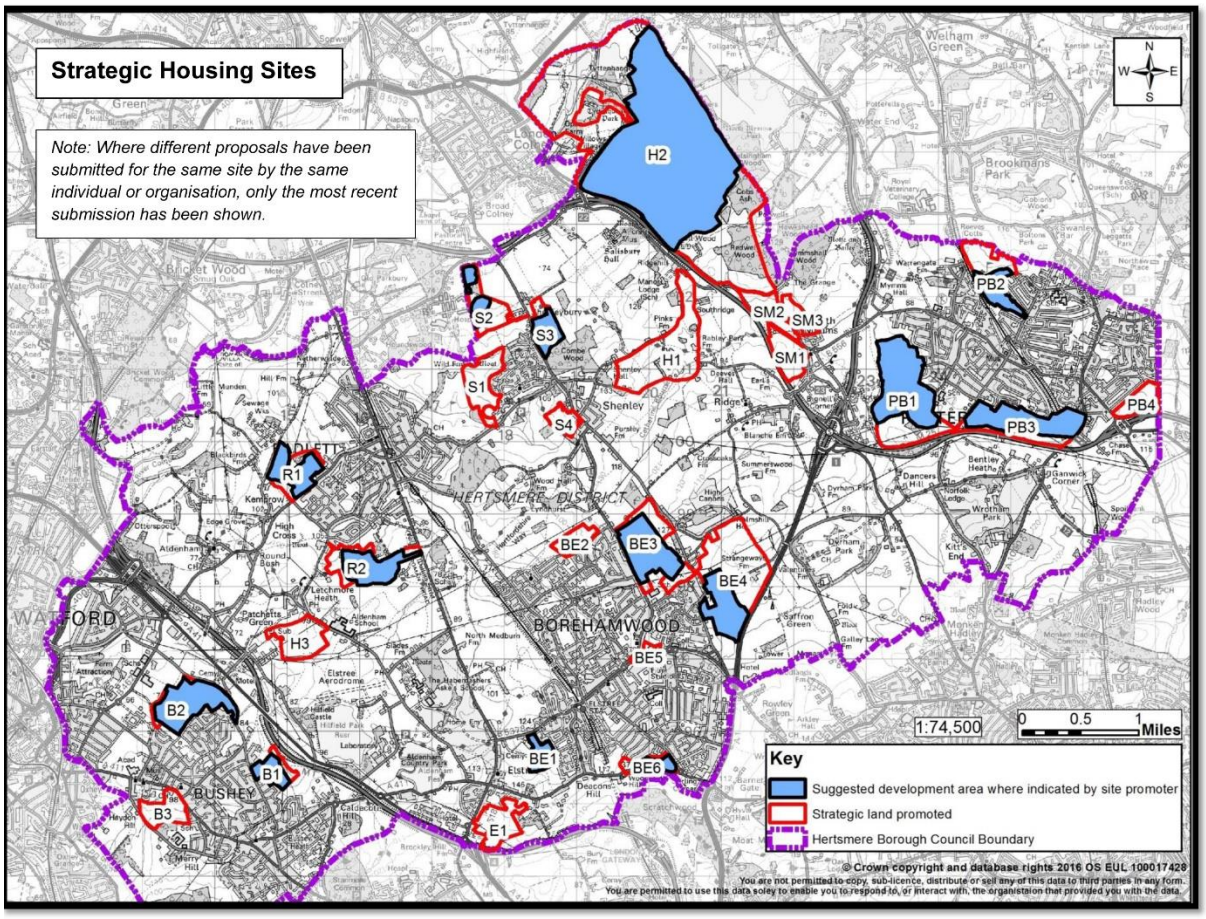
Note this image has been reduced to only include southeast area of the district.



Potential sites for Housing and Employment | Hertsmere Borough Council 10

6.22 These maps from St Albans and Welwyn Hatfield call for sites demonstrate the very significant pressure the Green Belt is under in the area, while not all will be developed some are being brought forward. Some promoters and developers are bringing forward sites as neither St Albans or Welwyn Hatfield have up to date Local Plans. Hertsmere are currently at Reg.18 consultation on Garden Village between Colney Heath and London Colney.

6.23 Gap between Hatfield and St Albans

The proposed quarry site forms part of a key gap between St Albans and Hatfield thus preventing coalescence of the towns. The width of the gap between St Albans and Hatfield is at its narrowest along the route of the St Albans Road (A1057) at 1.2km. The urbanising influence of the proposed junction with the related gates etc. would have a significant impact in the reducing the gap to approximately 1km.

6.24 Conflict of Interest at HCC

On this evidence alone it should be difficult for the inspector to give any weight to officers comments or their recommendations regarding this application.

6.25 Impact of the proposals

LANDSCAPE AND VISUAL 8 (Brett/SLR)

‘6.26 8.64 The magnitude of change upon individual elements and features during operational phases would vary over the project lifecycle from low during initial site establishment, rising to medium during the middle phases (maximum extent of disturbance), then becoming low towards the later phases, due to the following:

- *progressive clearance of vegetation and soils in advance of operations, starting with initial site clearance around perimeters, northern and eastern areas, then gradually working westwards;*

- *diversion of 0.6km of public right of way and other permissive footpaths and access within the application site around the perimeters;*

- *advance planting of approximately 2km of native trees and shrubs around the perimeter and a small c1ha block adjacent to the plant site at the outset and then retained on a permanent basis;*

- *retention of two great crested newt ponds around the boundary / corridor, with new ponds created;*

- *new internal access roads, including over 0.8km from A1057 site entrance to the plant site area, installed at outset and retained on a permanent basis;*

- *formation of soil/overburden storage mounds, typically 3 to 5m above existing ground levels, mainly around the site perimeters with steep gradients as dictated by operational and geotechnical constraints and other shorter-term locations as necessary;*

- *formation of the around 11ha plant site area at the outset, including new structures (processing plant with up to 10m highest point and batching plant with up to 13.3m highest point) and temporary formation of mineral stockpiles up to 10m above existing ground levels and steep sides;*

- *formation of voids on a progressive basis, typically by between 12 and 17m below existing ground levels, to the base of the lower mineral horizon (leaving 1m standoff to the chalk), across the c53ha mineral extraction area and all with steep gradients as dictated by operational and geotechnical constraints;*

- *subsequent engineering, backfilling and restoration of majority of voids on a progressive basis, using imported inert materials and site derived materials; and*

- *the operational phases at the site as a whole are long term overall'*

6.27 We need to understand the implications of this -

The early but shorted lived stage will only have a modest impact on the area. The operational stages quarrying and backfilling by far the greatest time 30 or more years will have significant impact on the area. The final removal of infrastructure and reinstatement will have a less impact, but again over a considerably shorter time scale.

6.28 Progressive clearing of the site leaving a flat barren landscape with 3-5m high moulds of soil round edge of the site while quarrying.

6.29 Residents will be restricted from accessing most of the site with paths going round the edge, we should also note the existing restrictions to the countryside beyond due the conveyer system.

6.30 The existing trees and shrubs many over 20 years old will be replaced by newly planted plants which will take many years to establish and to form an effective screen. The proposed small-scale planting near the processing area will be dwarfed the 13.3m high processing plant and the stockpiles for most if not all of the working life of quarry.

6.31 We need to consider the processing area with a maximum building height of 13.75m (Appendix 3-1_Indicative Elevations of Concrete Batching Plant) and stockpiles up to 10m high. The HQ3-3.0 Plant Site

(Masterplan)_A3 indicates that processing area would be approximately 600m into the Green Belt beyond the settlement boundary of Smallford.

7 Conclusions

7.1 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.

7.2 The area 36 Green Belt Purposes Assessment confirms that this area preforms 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

7.3 All assessments found 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.

7.4 Both the proposed entrance from St Albans Road (A1057) and the processing plant with the related storage yards would 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 hight of the proposed structure and stockpiles and the time new landscape planting will take to establish and fore fill its intended role.

7.5 All assessments completed assess the gap at approximately 1.3km, the site access is within this zone 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.

7.6 The processing area will project approximately 600m (ref HQ3/3) 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.

7.7 Due to nature of quarrying all the existing tree and shrub growth will be removed leaving a prairie 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.

7.8 Due to the existing and former quarry sites in the area, the existence of major road infrastructure restricting access to areas locally, Green Belt and cumulative impacts merge and so need considering together for this location.

7.9 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. 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. The area between St Albans and Hatfield has already seen considerable development and continue to experience considerable pressures on the Green Belt. On balance the benefits of the minerals do not outweigh the harm.

7.10 When all factors are considered, the Green Belt and character of the area are of major significance to the area and should carry great weight for this appeal in an area which has had continuous quarrying since 1930s.

7.11 On this evidence the appeal should be refused, as not complying with Green Belt Policies, and causing significant harm to the character of the area.