

**IN RESPECT OF THE APPEAL AGAINST THE DECISION OF
HERTFORDSHIRE COUNTY COUNCIL FOR THE DEVELOPMENT
OF**

**LAND AT HATFIELD AERODROME, OFF HATFIELD ROAD,
HATFIELD, HERTFORDSHIRE**

PLANNING INSPECTORATE REF: APP/M1900/W/24/3346607

LOCAL PLANNING AUTHORITY REF: PL/0232/21

**Paper submitted by former Rule 6 parties now third parties at
the request of the Planning Inspector**

Green Belt

Planning framework

The National Planning Policy Framework (NPPF) provides us with clear policies in relationship with Green Belt (GB) and mineral workings. The entire application site is within the GB.

NPPF December 2023

143. Green Belt serves five purposes:

- a) to check the unrestricted sprawl of large built-up areas;*
- b) to prevent neighbouring towns merging into one another;*
- c) to assist in safeguarding the countryside from encroachment;*
- d) to preserve the setting and special character of historic towns; and*
- e) to assist in urban regeneration, by encouraging the recycling of derelict and other urban land.*

155. 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;*

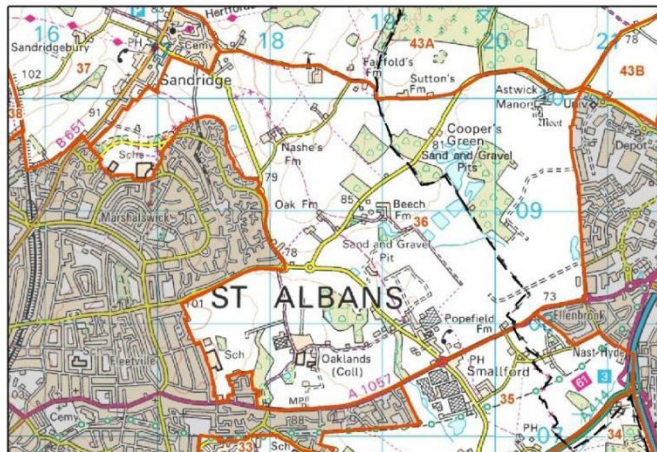
para 155 b-f are not relevant in this situation

The most recent assessment of the Green Belt in Hatfield and St Albans areas was undertaken by Arup as part of the St Albans Local Plan evidence base - St Albans Stage 2 Green Belt Review Final Report June 2023. However, this was a more detailed assessment looking at areas which the earlier SKM stage 1 Green Belt assessment had identified as possible locations or areas in which subareas could be suitable for further evaluation. The Arup assessment also included most of the Green Belt promoted sites identified via the St Albans Call for Sites.

The SKM 2013 Green Belt assessment is large parcels of land so it only provides an overview of the gap between St Albans and Hatfield. However, it does conclude that the gap is important and meet many of the five Green Belt purposes.

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.



Land use Predominately arable farmland, plus Watling Chase Community Forest, Ellenbrook Park, Hatfield Aerodrome, Oaklands College / educational campus, Home Office centre, sports centre and playing fields.

Land at House Lane displays urban influence and greater sense of enclosure



View to south from Woodcock Hill shows strong rural and open characteristics



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.

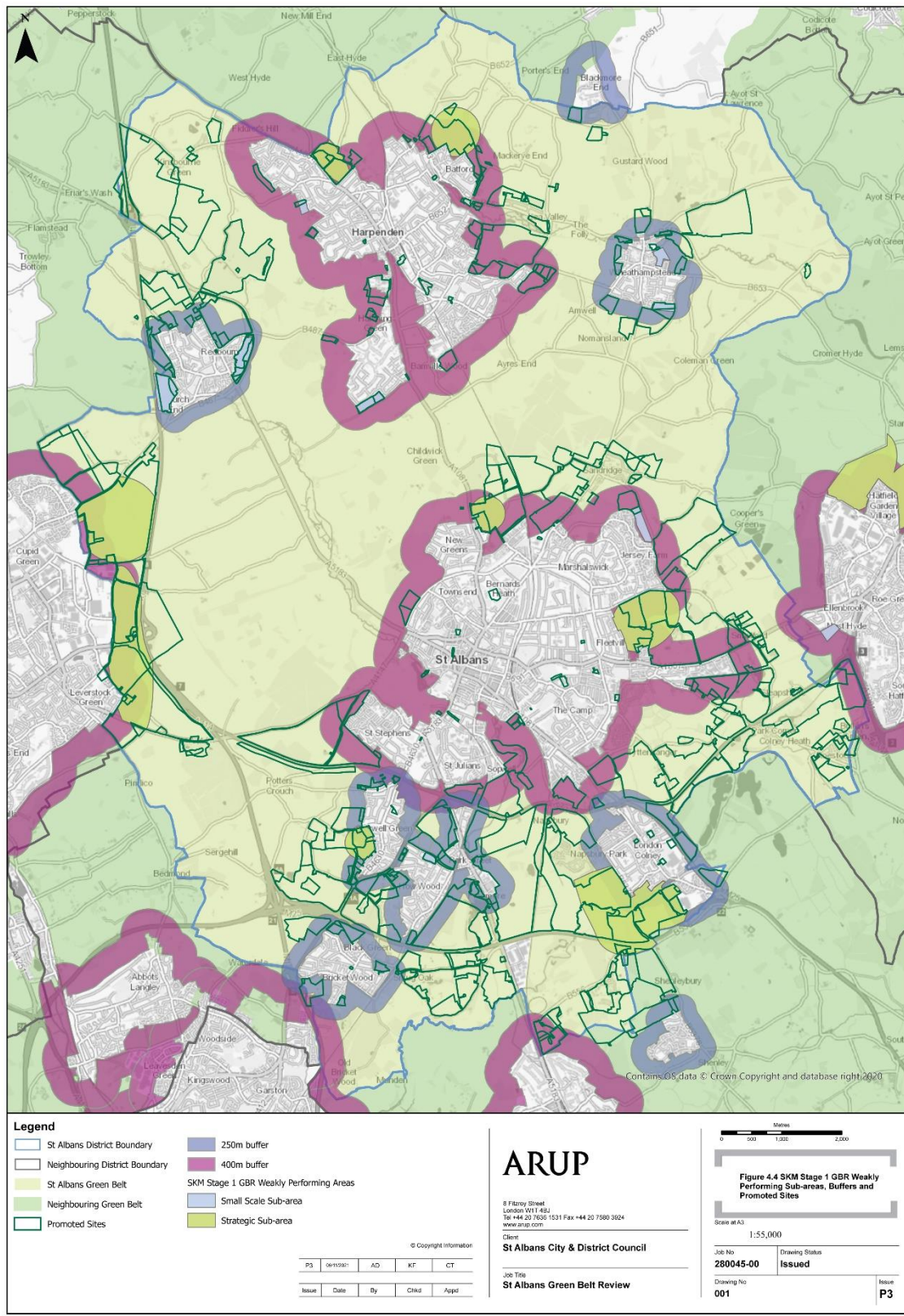
GB36 – Green Belt Purposes Assessment		Contribution
To check the unrestricted sprawl of large built-up areas		LIMITED OR NO
The parcel is located away from large built-up areas of London, Luton and Dunstable and Stevenage. It does not form a connection with a wider network of parcels to restrict sprawl.		
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 characteristics in large scale 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 (3 rd). 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.		

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	

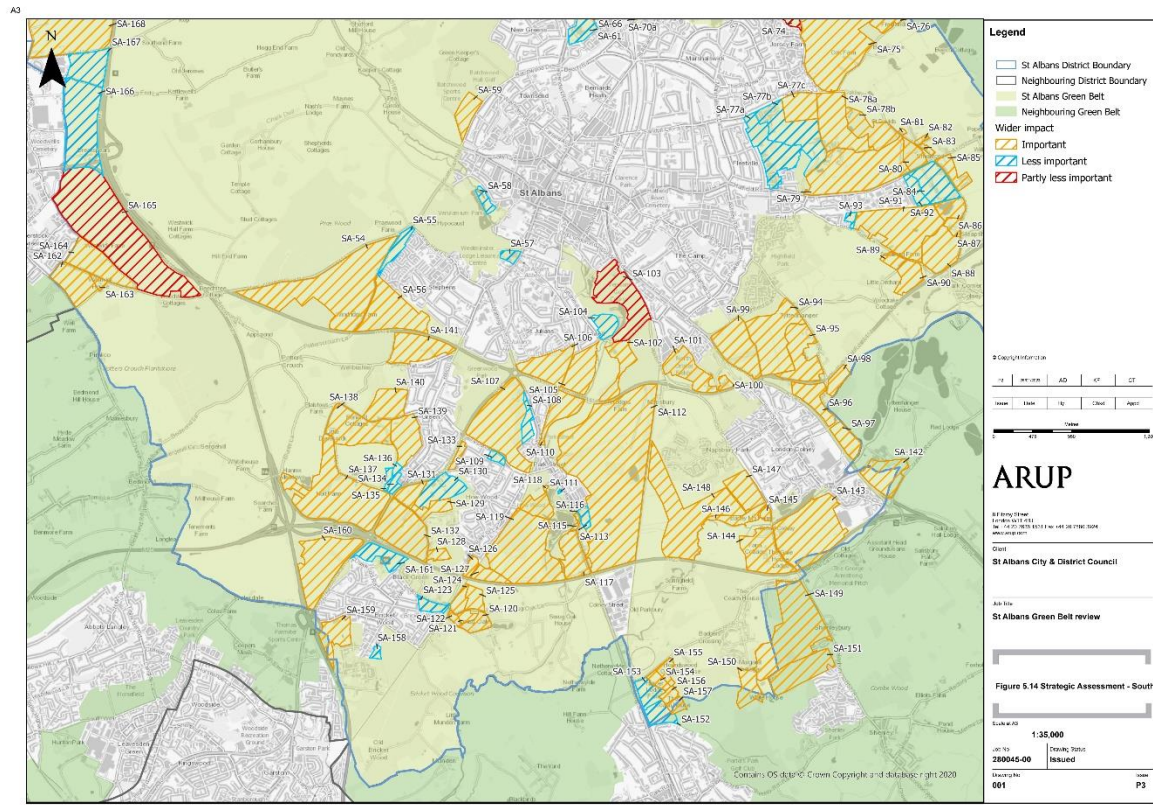
pattern of uses with the semi urban campus developments dominating.

GB36 – Next Steps

Area enclosed by residential development at east St Albans along Sandpit Lane is recommended for further assessment as a strategic sub-area (SA-S3). In light of the functions of the strategic parcel, the sub-area includes a number of built uses and urbanising influences. It is a relatively open landscape. On land to the east of St Albans which penetrates into the settlement, urban influences are particularly strong and there is significant built development within the Green Belt at Oaklands College, which has recently expanded. The land along Sandpit Lane is enclosed by three urban edges and this limits the contribution of this local area to the wider Green Belt and its important role in separating settlements. A reduction in the size of the strategic parcel at the sub-area location would have a limited impact on the overall role of the Green Belt and the physical separation of settlements. It would not reduce the existing minimum distance of the gap between St Albans and Hatfield which is 1.4km. This land makes a limited or no contribution towards checking sprawl, preserving setting or maintaining the existing settlement pattern.



This Arup GB assessment uses 250 and 400m buffer zones around urban areas, this assessment clearly demonstrates the narrowness of gap between the two towns. The proposed quarry would occupy the area of this gap. The promoted sites and the small village of Smallford are shown by the green outlines.



Arup's GB assessment of boundary sites in St Albans, the blue hatched area to the southwest of the application site are glasshouses Arup's assessment has been more recently confirmed in the ministerial statement on Grey Land which included a reference to former GB glasshouses being appropriate for redevelopment. Arup considered Smallford to be a small village and should remain as washed over Green Belt settlement.

The NPPF para 155 is clear that certain developments are is not inappropriate, this includes mineral extraction providing they preserve its openness and do not conflict with the purposes of included land within it. Therefore openness and visual impacts become a significant factor in the medium term.

Site entrance

The site entrance will reduce the gap between St Albans in both visual and perception terms, the entrance will result in the urbanisation of the gap between St Albans & Hatfield and this is exacerbated by the loss of large mature trees. During site construction and restoration stage the processing area buildings and plant will be visible from the road. The processing area and equipment will also be visible from the road during early phases before the bund is constructed and then during the later phases when it's removed for quarrying. Due to the flat landscape this will provide views of an industrial landscape from the road at the access road entrance.

Construction and location of the bunds

There is a visual element in openness of the Green Belt established in case law. The detailed visual impacts are considered in the CHPC Landscape Visual Impact Assessment. While the proposed locations of the bunds offer some noise and visual screening, their impact on the openness of the Green Belt would be significant. The most significant impact would be the location and size of bunds away from the processing area i.e. within the core park area.

The proposed location of bunds is not strictly required for mineral working, therefore the visual impact is contrary to NPPF para 155. The height of the bunds will also have a negative impact on the openness of the GB. The lower topsoil bunds at 3m high will have considerably less impact than the subsoil and interburden bunds at 4m and 5m due to the height of the shrubbery offering some screening and the colour of soil. The subsoil and interburden bunds will take time for any mitigation plantings to become effective and they will not be screened by the existing or any new landscape shrub plantings.

However, if minded to grant, planning conditions could be used to reduce the height of bund outside to the processing area to 3m and to require improved landscape orientated design of the footprint of the bunds to reduce the industrialised visual impacts.

Staff car parking – is not a function of mineral extraction therefore contrary to NPPF para 155. The number of car spaces is significantly greater than the number of employees and given the close proximity of the site to public transport and cycleways more sustainable modes of travel should be encouraged. The vehicles will also add to the noise and air pollution generated by the works.

Impact of the Processing Plant Site

This area will have a significant impact on the openness of the GB and, while the processing site falls within the defined restrictions of the GB, we can not find any assessment of why the processing plant needs to be so tall. Therefore, consideration should be given within the planning conditions to reduce the height of plant thereby reducing its impact. Consideration has been given to bunds above.

Reinstatement

The time scale for completion, including reinstatement, is given as 32 years, However, there appears to be a significant difference in amounts of exported and imported material which suggests that the time frame is impossible to maintain. Either –

- a) It's impossible to complete reinstatement which would be contrary to minerals Plans and the draft planning conditions; or
- b) The time scale will require extending considerably which would be contrary to this application and the draft planning conditions; or
- c) The number of HGV movements is grossly understated and therefore the consultation responses are invalid, the highways assessments are invalid and the draft planning conditions cannot be met; or

The restoration cannot be achieved in accordance with the submitted restoration plan, HQ15 Restoration Plan Rev1.

If the restoration cannot be achieved in accordance with the restoration plan, then the application would be contrary to NPPF para. 155 as openness would not be maintained.