Colney Heath Parish Council (CHPC) objects the proposed new quarry at the former Hatfield Aerodrome PL/0232/21 on four planning issues; Access to Country Park; Time Scale; Green Belt; Cumulative Impacts

Executive Summary

Access to Country Park

Despite the HCC reg25 letter, the Inspectors comments, and the well-known concerns of the resident groups on the issues related to access to the Country Park no additional meetings have been arranged by the applicant (Brett) to understand or try to resolve the access issues as highlighted in HCC reg25 letter and the Inspectors comments.

Hatfield is identified in Hertfordshire Mineral & Waste Plan is being in deficit of green open space, the loss or reduction in access to open space would cause considerable harm to residents of the area.

The Parish Council and resident's associations have undertaken a study to understand the usage of the Country Park as Brett have done nothing.

Our study identified a high level of use during often adverse weather conditions and enabled us to understand the routes used within the park.

The entire site layout is incompatible with maintaining access to the Country Park. All the main access points are blocked with both infrastructure and poorly designed phase layouts.

The HCC req25 letter set standards for the access that would be required, attractive to users, maintain access, of high standard and to consult with local interest groups, **none of these criteria have been meet.**

The proposed routes require long detours, routed beside a noisy road (A1057) or run in close proximity to the processing area. There is no statement about the construction standard to be used, this a particular concern for people with disabilities. From the published data noise within the park will also be a very significant issue, with levels being well above the ambient level for the area.

Time Scale

32 years of quarrying based on 4 years per phase would result in long term harm to the area, however that only stated in 2021 document. By the 2022 documents it first increases to 4.5 years per phase then later in the same document to 5 years per phase. The total could be between 37,5 to 41 years including restoration.

Brett can't even keep their story consistent.

This is a very considerable increase from the time scale considered at the Inquiry. The impact on the local communities would be significantly greater due to the increased time scale.

The Inspector at the inquiry made it very clear that any improvements to the landscape should in planning terms carry no weight. However, our analysis would indicate any improvements would be only very marginal and would not offset the harm caused by the quarry.

Green Belt

The application site forms a vital gap between St Albans and Hatfield thereby preventing coalescence as highlighted by both St Albans District and Welwyn Hatfield Councils as the gap between the two towns is narrow 1.3km.

The opening of access road and the construction of processing area would reduce this further. The visual impact would be significant due the level Hatfield plain and time scale any mitigation would take to establish.

CHPC has very considerable concerns about the reliability of the LVIA and has identified multi errors within the document.

Cumulative Impacts

The parish of Colney Heath has suffered from the harm from quarrying since at least 1930s. The Cemex site and its infrastructure adjoins this site and has been operating since the 1960s and will continue for at least another 10 years.

Granting planning permission for this quarry would be contrary to both NPPF and Hertfordshire Mineral plan policies.

The Cemex site is on the edge of Smallford, most of the Cemex output must travel through Smallford to access the major road network. The application site is also on the edge of Smallford so the same roads would be impacted by the application site traffic.

The A1057 Hatfield-St Albans Road suffers from peak time delays this will only get worse. All the output from Cemex and this application sites must travel along what are primarily residential roads.

The parish of Colney Heath is already negatively impacted by more quarries and waste processing sites than any other parish in Hertfordshire. The harm is either by the sites being within the parish or access is via the parish or by odour from the site.

For the above reasons Colney Heath Parish Council strongly objects the proposed new quarry at the former Hatfield Aerodrome due to:

poor access to Country Park during the quarrying;

the quarrying timescale;

the impact on the Green Belt and

the cumulative Impacts of quarrying for over a century if the application is approved.

Colney Heath Parish Council are very disappointed with Hertfordshire County Council for holding the consultation for such a significant planning application over Christmas and New Year period.

CHPC feel this has put those wishing to object at a very significant disadvantage. It has placed a very considerable burden on parish councillors, residents and volunteers who have undertaken the work required to prepare this objection.

Time Scale

The duration of the quarry and its impact on the local resident's health and wellbeing is critical as well the closely related environmental impacts.

In application PL/0232/21 documents submitted in 2021 the timescales for each phase was given as 4 years, with the comment that this might change due to market and climatic conditions. This would equate the widely quoted project time of 32 years.

Following HCC reg25 request in 2022 the applicates response in the LVIA appendix02final table 2 quoted 4.5 years per phase (7 x 4.5 = 31.5 years) then in LVIA appendix03 final table 3 increased to 5 years per phase. (7 x 4.5 = 35 years) No amendment or change to the earlier statement about variation due to market or climate impact was made therefore one conclude that this remains in place.

This means the quarry impact will last at least 25% longer that those stated earlier or up to 40 years from these latest documents.

Add 2 years set up and 4 for final restoration means 37.5 to 41 years. however carefully its hidden in the detail

This increase in time scale amounts to a major change to the application and should treated as such due to the cumulative impacts from other quarries in the area and the restriction on use on the Country Park.

Any benefits for residents resulting from the Quarry.

The inspector at the Hatfield Inquiry was clear that any improvement to the landscape and Country Park in planning terms can carry no weight due to the time scale over which they would occur.

This is even more significant now as it's emerged the lifespan of quarry is at least 40 years rather than the 32 years the inspector quoted.

Appeal Decision APP/M1900/W/21/3278097

70. The appeal scheme, even with progressive restoration, would have an adverse effect on the character and appearance of the area for 32 years, which in landscape terms is considered a long-term impact. With appropriate planning conditions for restoration and aftercare the appeal site would eventually provide an enhanced landscape for this part of the former airfield in accordance with MLP Policies 13 and 14. But it seems to me that this benefit would arise so far into the future that it would not compensate for the cumulative harm over the long operational period of the appeal scheme.

71. For the reasons set out above, I consider that the appeal scheme would have an adverse effect on the character and appearance of the area of moderate/substantial significance.

To aid readers and officers the CHPC comments follow the sequence of HCC reg25 letter.

Population and Human Health / Public Health

Hydrogeology and Bromate

CHPC are very concerned over the risks related to quarrying above or near an area known to be contaminated with bromate.

Similar to our conduct at the Inquiry and to avoid duplication CHPC is co-operating with other rule 6 parties. The response details are left to other rule 6 parties.

Public water supply

Everyone is hoping that the current mitigation of the largest bromate contamination in Europe continues to work, and no additional problems arise resulting from quarrying.

At the Hatfield Quarry public inquiry, the experts were unable to agree on the risks related to any future movement, nor possible impacts resulting from quarrying on the application site.

If the bromate contamination expands to a larger area the impacts would be widespread to the due large area supplied by rivers Colne and Lea catchment areas and the associated aquifers.

Bromate is a known to be harmful to health and has strict maximum permitted levels in drinking water, therefore the issue becomes related to reliability of the supply.

Bishops Rise Hatfield is already being used for mitigation of the plume. If this is unable to manage the plume and other local pumping stations are required or became unavailable to supply public drinking water. The situation would become very serious very quicky particularly in a changing climate and an area where drinking water supplies are already challenging due low rainfall and a high population. There would be a major impact on the County Council's ability to deliver growth along large parts of the A414 growth corridor

CHPC are unable to find any studies related to the health of people living in the Hatfield area related to possible bromate poisoning, this is a concern however it may not be in the public domain.

However low the risk is CHPC believe it should take any risk with the bromate plume and impact related to the health of many thousands of Hertfordshire residents.

Keeping your fingers crossed and hopping for the best does not appear a safe way to protect a public water supply therefore CHPC believe the application must be refused on this ground alone.

CHPC are very concerned over the wider impacts and risks on rivers in the area. The river Colne internationally rare chalk stream with only about 200 world-wide.

The flow in these rare chalk streams does vary throughout the year, however the flow has ceased in the Colne more often and lasted for longer in recent years. Climate change the warmer summers may be partly to blame, however CHPC are concerned on impacts resulting from the mitigation of the bromate contamination.

Bishops Rise pumping station is currently extracting up to 9,000,000 litres per day which then pumped into the sewer network. Once treated this water is discharged into the river Colne many miles downstream.

While Bishops Rise is unable to supply water for the public supply, the water needs to be replaced from other sources. Colney Heath village has two existing pumping stations which are likely to replacing some of Bishops Rise normal supply.

The concerns are five-fold -

a) The loss to the groundwater and in turn water in the aquifer due the current 9,000,000 litre per day extraction required for mitigation.

b) The additional load placed on existing pumping stations within the area which impact on river Colne and possible the river Lea.

c) Impacts from climate change.

d) Further expansion of the bromate plume requiring additional mitigation due to the possible impacts from the application site, however low they are claimed to be.

   The experts are still learning on the job how the plume is moving, what future impact might be and if the proposed measures on the application site will in fact work.

e) CHPC also have a concern about possible impacts resulting if any the local Colney Heath pumping stations were to increase output on the river Colne and its flora and fauna.
   The upper Colne was identified in 1995 Environment Agency report as requiring support to maintain summer flow rate.

CHPC supports the need to mitigate and manage the existing plume to protect the public water supply, however, has significant concerns over any additional or future risks.

Dust

CHPC are very concerned over the long-term exposure to dust resulting from quarrying activities in the area. The dust is in two forms from traffic particularly HGVs and silica dust from spillage from lorries. The parish has a long history of road spillage from lorries with more quarries and landfill sites than any other parish in Hertfordshire.

The one is the greatest concern is Cemex with the bulk of its output travelling through Smallford. A roadside inspection will identify high levels of fine dust and sand in the gutters for many metres from the site entrance. This also gets blown around and ground finer by repeated vehicle movements.

CHPC can find no evidence of any detailed investigation into any harm this might have caused or will cause in the future. The application site will add to the existing high levels on the road.

Landscape

HCC reg25 letter

The Inspector found the appeal scheme, even with progressive restoration, would have an adverse effect on the character and appearance of the area for the 32 year duration of the operation, which he regarded to be of moderate/substantial significance.

In relation to the country park use, the Inspector gave weight to the application site forming part of a country in the context of a wider extensive area of open land accessible to the public at all times (as set out in the original s106 obligation). The Inspector found the LVIA for the 2016 scheme understated the 'likely impact of the operation on extensive areas over a long period of time within a locality that includes a Country Park'. At the Inquiry the Council argued the LVIA does not properly assess the effects from within the Park.

CHPC believe that Bretts new Landscape Visual Impact Assessment (LVIA) is still fundamentally flawed. It contains so many errors that it's impossible to rely on this document.

CHPC has identified some of the many errors within each of the following topics.

- Time scale
- Access to Country Park
- Visual impact assessment
- Impact on Heritage assets
- Percentage of Country Park available to users

Landscape Visual Impact Assessment (LVIA)
Appendix 03: Landscape and Visual Impact Assessment

1.2.2 Visual Effects

Viewpoints are chosen, in discussion with *the competent authority (in this case Hertfordshire County Council) and* ***other stakeholders and interested parties,*** *for a variety of reasons* ***but most commonly because they represent views experienced by relevant groups of people.***

CHPC highlight above - None of the rule 6 parties were consulted.

Appendix 03: Landscape and Visual Impact Assessment

1.4 Study Area and Site Context

The proposed development site is located within the Green Belt between St Albans and Hatfield, as indicated on Drawings HA LVIA/01: Site Context and HA LVIA/02: Landscape Character. The site includes part of the original Hatfield Aerodrome, comprising woodland, scrub and grassland which correspond with the western extent of the associated runway. Other parts of aerodrome site to the east have subsequently been redeveloped.

Due to vegetation and a limited range in elevation, landscape and visual effects outside the proposed development site are relatively restricted and limited to well within 1 km of the development boundary. The LVIA submitted in 2016 for mineral extraction established a number of viewpoints around the proposed site which illustrate the level of site containment.

CHPC believe that the stated levels of change, sensitivity and magnitude of impact are not consistent with this statement.

CHPC then considers the magnitude against a significantly wider area beyond 1km stated above.

CHPC are concerned over methodology used in the landscape Visual Impact Assessment (LVIA).

While methodology is to a known standard CHPC believes it does not assist the readers understanding how the changes in each stage will impact the landscape due to the different scale or distances used throughout the assessment.

The LVIA compares impact over a wider beyond 1km. It then fails to reflect on the existing impacts from infrastructure and other mineral activities in the area. The area around Colney Heath and Smallford has suffered from over 90 years of quarrying, with many sites not being restored to a satisfactory standard this impacts on the surrounding landscape. While the application site has some flaws much of the surround landscape suffers from significantly greater level of harm.

- **Cemex site** large processing site, lagoons, conveyors
- **Furze field and Cooper Green Lane** – active quarries
- **Smallford Pits** badly restored now owned by HCC.
- **A414 Hatfield** Colney Heath poorly restored landscape
- **A414 Tarmac** large scale processing site
- **Tyttenhanger Estate** large scale active quarries due to last many more years.

The LVIA has also totally failed to consider the difficulties in access to alternative countryside within the surrounding area.

Time scale

As already highlighted the quarrying will last much longer that stated earlier. This would result in significant adverse impacts on the area, including reduced access to the Country Park and harm to the landscape for upwards of 40 years.

Construction Phase

This is responded to in detail later in CHPC comments on LVIA.

CHPC believe the impact on the landscape will be widespread across much of the Country Park due to the need to construct roadways, the processing area, the lagoons the bunds, and related access routes. The harm to the landscape will result from the need to clear large areas of the existing trees and shrubs for the construction and working areas related to them. The need to clear wide working areas particularly when constructing the bunds will create long vistas focusing towards the construction areas thereby causing additional visual harm.

Operational Phases

CHPC are concerned about potential for flooding in the restored areas prior to the final stage restoration. We quote from LVIA and GMWWP.

We note the need to manage ground water due to the bromate contamination in the area that the applicant proposes the use of clay seals and buttresses around and in each phase.

Groundwater and Water Management and Monitoring Plan (GWMMP)
FINAL DRAFT….

4.5.2 LMH Backfill Backfilling of the LMH void will be undertaken using site won overburden and IB material only. The LMH void will be filled concurrently with the mineral extraction process in small areas as defined above and will self-consolidate when placed beneath the water. LMH mineral will be left in place if there is insufficient site won overburden and IB to backfill all the phases of the LMH.

Site won backfill will be placed in the LMH void until it is a minimum of 1m above the groundwater level or at the base of the IB, at which point it will form the subgrade for construction of the basal geological barrier for the inert landfill.

As the filling proceeds and given the hydraulic properties of the chalk/LMH aquifer any mounding of the groundwater surface created by the infilling process will be slight and short-lived.

4.5.3 Geological Barrier Placement The subgrade will be prepared, and the geological barrier constructed using standard engineering techniques and will be subject to Construction Quality Assurance (i.e., specification, CQA Plan, independent supervision, and validation report). The basal geological barrier will in essence reinstate the IB layer separating the UMH from the LMH, which together with the sidewall geological barrier will form a continuous engineered seal across each phase and the entire site.

4.5.4 UMH Backfilling Once each area is lined, inert waste can then be placed into the void above the basal geological barrier and adjacent to the sidewall geological barrier/UMH perimeter buttresses. The site will be restored with subsoil and topsoil to a similar level as the unworked site in accordance with the approved restoration plan.

Appendix03 LVIA Report
3.4.1 Clay Ground Water Seal Treatment

At ground level the main component of the extraction area visible is the clay seal around the edge of each phase. Such seals would generally be visible for a period of around nine years between extraction and infilling. The tops of the seals would be covered with soil and seeded to merge them into the final restoration. However, it is proposed to extend this by the establishment of vegetation on solid clay sides. This is not usually proposed but is possible as indicated in research and trials. The proposed crops would consist of a ryegrass-clover mixture, winter wheat, spring barley, spring oilseed rape and spring beans. This approach would be used in specific areas where the clay seals where particularly intrusive in views. The objective would be to establish a sacrificial crop to reduce the visual contrast of the top-most sections of the clay seals and support wild bird populations.

Each phase has clay buttresses around all sides and once LMH has been worked the LMH is filled in inter-burden which the applicant states is boulder clay which has a very low porosity, so effectively sealing each phase once backfilled into a waterproof soil filled reservoir.

During backfilling of each phase, the soil is likely to become saturated from rainfall. Some surface evaporation will result in some drying in summer months, however this will be insufficient to entirely dry the soil out so gradually the soil will become fully saturated leading to winter surface flooding and waterlogging.

The impacts resulting from the construction buttresses and sealing of the base to manage the risk from bromate contamination are clear. If the interburden (IB) seals and buttress work as claimed the restored areas within each phase will become flooded and waterlogged thus restricting regeneration and reinstatement.

This will dramatically restrict usage and access of significant areas of the Country Park. If the IB seal and buttresses do not work as claimed there is a very significant risk to the water supply. This is another reason why the application must be refused.

CHPC have complied this data to demonstrate the issue.

Average rainfall 700mm per year (Rothamsted)

Water holding capacity of soil (as rainfall holding capacity per 1m of soil (afp))

Sand	65mm per 1m of soil
Clay	100mm per 1m of soil
Loamy sand	115mm per 1m of soil
Silty clay	130mm per 1m of soil
Fine sandy loam	165mm per 1m of soil
Silty loam	195mm per 1m of soil

Loss from evaporation unknown due to soil type of backfill, level of compaction and or foliage cover. The applicant accepts the soil conditions and therefore also growing conditions will be poor by stated use of pioneer plant species.

The onsite drainage ditches are not proposed to be dug until phase D reinstatement (as shown on plans) or final phase is completed (GWMMP FINAL) depending upon which document is correct. Another Brett inconsistency

The annual rainfall in the area is above the water holding capacity of the soil as each phase is surrounded by an impermeable layer of clay, they will become saturated in the winter months this is likely to last into the spring.

ES chp06Water 6.148 During operation, the UMH perimeter bunds would create a barrier to groundwater flow within the UMH that could cause groundwater levels to rise and locally alter flow direction. During certain seasons, groundwater within the UMH is close to the ground surface and the barrier effect could result in local groundwater flooding. The magnitude of the impact of increased water levels in the UMH is 'moderate' giving a significance of effect of 'moderate' so mitigation would be required.

The applicant acknowledges the issue of groundwater around the perimeter of the phases but fails to link this with ground water flooding within the restored phases. CHPC believe this will result in the restoration running late, and trees and shrubs failing to establish and make satisfactory growth. The result will in large area of poor grassland and sparse tree and shrub growth.

Any experienced landscape surveyor should have noted that some areas of the park currently suffer from winter waterlogging. This results in clearly evident stunted growth of trees and shrubs.

An experienced landscape surveyor would have recommended undertaking additional investigations.

Flooded area January 2023 where the current path crosses proposed phase B

It is difficult to understand how the LVIA comes to the conclusion the that in landscape effect is the same in all phases.

If the landscape effect of phase A is moderate, then phases C-E would be significantly greater as it divides the Country Park into small segments. Eastern end Hatfield Village, lagoons and related infrastructure, phases A and B restored or semi restored, operational phases C-E, unworked phases F and G, the access road and processing area.

One must also note that these phases last longer due the combined impact of multi phases compare the starting single phase A thus changing the overall balance to considerably greater harm. **CHPC must challenge LVIA magnitude of Change.**

Stage	Magnitude of Change
Advance works	Slight
Site Establishment	Moderate/Slight
Phases A-G	Moderate
Final restoration	Moderate/Slight
Added Value	Substantial/Moderate

If by quarrying the applicant has destroyed an existing landscape, albeit with minor flaws, mounds of soil in central area, however these only cover a small percentage of the site and from most directions are already screened by shrubs. Then reinstated it is **totally unrealistic** to claim any added value as the as the new landscape will be 10-40 years behind the current landscape in maturity.

Public Access

The draft Hertfordshire Minerals and Waste Plan currently at reg18 identifies Welwyn Hatfield District as being deficient in public open space.

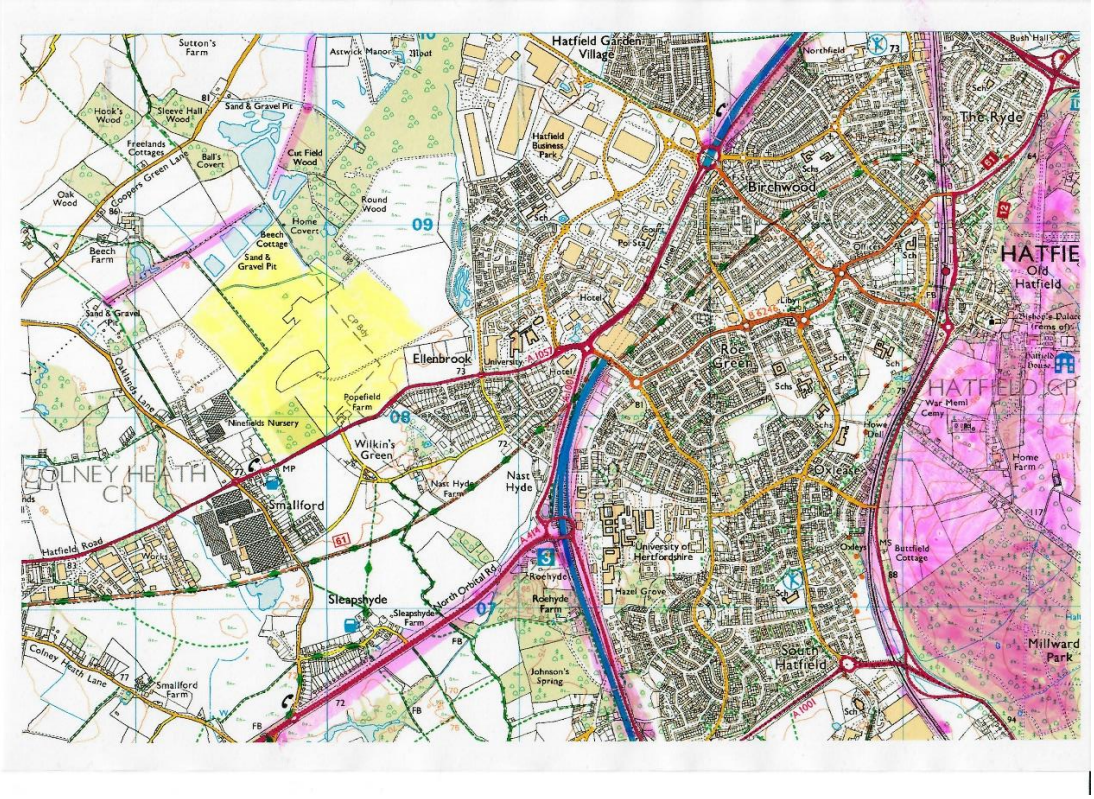
ES appendix 13-1 HIA

5.1.8 Greenspace

A report for Welwyn Hatfield Borough Council highlighted that only 468 ha or 3.6% of the Borough is Accessible Natural Greenspace (ANG) – areas of greenspace which are readily accessible to residents. The report also stated that: "Access to freely available natural and semi-natural space is more restricted in Hatfield than in other parts of the Borough. There is also significant deficiency in lateral links and access routes".

CHPC analysis indicates that this particular issue in Hatfield due to existing infrastructure and land ownership issues which restricts access and or routes to public open space. They key concerns are-

- **East Coast Mainline Railway** limited crossings points
- **A1(M)** with the only pedestrian crossings at either end of the Galleria.
- **A414 south of Hatfield** the only safe crossing is via Colney Heath pedestrian bridge.
- **A414/A1(M) and A414 north-east of Hatfield** no safe crossings to open space until Mill Green on A1000.
- **Hatfield House private park** with no public rights of way.
- **Cemex conveyor** with only one crossing point between Oaklands Lane and Coopers Green Lane.
- **Coopers Green Lane** is narrow, busy, and unsafe for pedestrians.
- **Alban Way** is considered by many to be unsafe due high-speed cyclists, this a particular problem for families with young children.



Map of restrictions (pink) to accessing open space in Hatfield area application (yellow) Mapping OS lic.0100055768 CHPC

CHPC analysis indicates that the Country Park provides an important open green space for the communities of Hatfield, St Albans and Smallford.

Access to Country Park

Despite the HCC reg25 letter, the Inspectors comments, and the well-known concerns of the resident groups on the issues related to access to the Country Park no additional meetings have been arranged by Brett, the applicant, to understand or try to resolve the access issues with any of the three rule parties at the Inquiry despite the community engagement statement made on Brett's website.

The applicant's Access to the Country statement is so fundamentally flawed that CHPC believe this alone should be grounds for refusal.

The access statement fails to consider the comments made the Inspector at the Inquiry para 76-79, Hertfordshire Mineral Plan, HCC reg25 request, or the terms set out in S106 agreement dated 2000.

Planning Regulations and Documents

Hatfield Inquiry Inspectors comments, Appeal Decision APP/M1900/W/21/3278097

Access to the Country Park

76. There is evidence from my site visits and representations to the Inquiry to indicate how much the public access rights secured in the 2000 s106 agreement are appreciated locally. Informal paths within the Country Park are well used. As a large open space, the Country Park provides opportunities for circular walks that include routes through relatively isolated and quiet areas. The 2000 s106 agreement provides for public access to be excluded when minerals are being extracted pursuant to a planning permission. Therefore, it seems to me that specifying an access strategy as an integral part of any grant of planning permission is an important consideration in this case.

77. However, I consider that the appeal scheme does not provides sufficient certainty in this regard. The appeal scheme does not make a clear distinction for each phase between areas of the appeal site that would be accessible to the public and where they would be excluded because of mineral extraction. The Phase Illustration drawings show permissive rights of way traversing areas that are not shown as required for mineral extraction. Such areas, in accordance with the 2000 s106 agreement (unless there is some specific provision in a grant of planning permission for mineral extraction to say otherwise), would remain accessible to the public.

78. In addition, some of the permissive rights of way identified on the application drawings would not provide routes that would be likely to be attractive to those visiting the Country Park. The Phase Illustration drawings indicate permissive rights of way terminating on the northern side of the A1057. Users seeking a circular walk would have to cross this busy route to walk along the footway on the southern side of the road. Given the speed of traffic and poor sight lines for pedestrians along this northern side of the road, such crossings, especially with groups of people that might include children or dogs, would be hazardous.

79. The 2021 s106 agreement provides for the dedication of bridleways that would be beneficial in the long term. However, the appeal scheme does not provide an appropriate strategy for public access throughout the lifetime of the operation that properly takes into account the provisions of the 2000 s106 agreement. Furthermore,

some of the proposed permissive rights of way would pose an unacceptable risk to the safety of pedestrians.

CHPC analysis concludes that most if not all of the Inspectors concerns have not been correctly assessed or responded with a proposal which would overcome the issues identified. CHPC analysis follows on pages 22-56.

HCC reg25 letter 30th March 2022

'You are advised to consult with the local interest groups, including the inquiry rule 6 parties, as well as the local access forum. I would encourage you to discuss the proposals with HCC Rights of Way Unit. I have forwarded you contact details for the Countryside Access Officers in this area who I understand may be able to facilitate meetings with local access groups.'

CHPC comment

Despite the strongest possible advice given in reg25 letter no meetings or consultations have been held with the rule 6 parties, Ellenbrook, Smallford Residents Associations RA) or Colney Heath Parish Council (CHPC).

The lack of engagement with the resulting lack of understanding of the needs of the local community and use of the Country Park has resulted in a proposal which fundamentally flawed and fails to answer any questions raised in reg25 letter.

However, the rule 6 parties and the local community have worked together to undertake a survey of the usage of the Country Park. **This has enabled the rule 6 parties to present an evidence-based objection to this application which something the Brett as applicant has totally failed to do.**

The applicates Response to HCC reg25 Letter

5.0 Public Access

5.1 Introduction The Council's letter refers to comments raised by the Inspector in relation to public access, noting that "an access strategy as an integral part of any grant of planning permission is an important consideration in this case." In view of this the Council indicate that to ensure the access strategy is appropriate and reflects the provisions of the original s106 agreement further information should be provided in the form of a written document and plans clearly setting out areas for public access for each phase of the mineral working for the duration of the operation. 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.

5.2 Response

A Public Access Strategy has been prepared and is included in Appendix 04 to this submission.'

CHPC objections are focused on this document Appendix 04, unless otherwise stated.

Application documents

Despite the HCC reg25 letter, the Inspectors comments, and the well-known concerns of the resident groups on the issues related to access to the Country Park no additional meetings have been arranged by the applicant to understand or try to

resolve the access issues with any of the three Rule parties at the Inquiry despite Brett's saying this has resulted in an Access Plan which is not fit for purpose.

Brett have not followed their statement to Local Democracy Reporting Service over ten months ago that ***"Over the coming weeks we will consult with local groups regarding this application and take any feedback."***

Brett set to consult on quarry plans for Hatfield Aerodrome site. Deborah Price, Local Democracy Reporter Published: 8:00 AM March 10, 2022 www.whtimes.co.uk/news/local-council/brett-aggregates-hatfield-aerodrome-quarry-plans-8745508

> *"Brett Aggregates will not challenge the decision of the Planning Inspector to dismiss its application to quarry on the former Hatfield Aerodrome site. But it will push ahead with a second application for the site, which was submitted to Hertfordshire County Council last year.*
>
> *Brett company representatives told the Local Democracy Reporting Service that – in light of the inspector's findings – they have made some changes to their latest application. "We currently have a second planning application which has been amended in light of the appeal Inspector's comments, to include more detail in areas such as public access," said a spokesperson for Brett Aggregates. "Over the coming weeks we will consult with local groups regarding this application and take any feedback."*

Access statement

The access statement is fundamentally flawed as it is not evidence based and in the view of CHPC the applicant has apparently done nothing other than draw a few footpaths and crossing points on existing plans with no detailed analysis of user's needs.

It thereby fails to meet the requirements of HCC reg25 letter, the S106 agreement or concerns raised by the inspector.

Without a detailed knowledge of the use of the Country Park and routes used by persons using the park any proposal will encounter problems, this application clearly demonstrates these problems.

Most larger scale planning applications require a highways and walking routes impact analysis and assessment.

CHPC view is that a similar level of detail is required to demonstrate that the access plan meets the needs of all users in a safe manner within the terms of S106 agreement.

Flooding within the Country Park

As already stated CHPC are concerned about potential for flooding in the restored areas prior to the final stage restoration, and this will significantly reduce the area available to users.

Brett are unable to commit to **"80 percent of country Park available to users"**

Brett should only have commented on land they may, in due course, have a right to occupation as they are not the landowner, and only have rights to quarry within the defined area. They have no legal interest in the remainder of the Country Park.

Under the terms of the Ellenbrook Country Park, Arlington the landowner has two break clauses in lease.

1) Minerals working
2) Construction of new homes factories or offices

While the area outside of the proposed quarry is not included in the current draft Welwyn Hatfield Local Plan for development, there are no guarantees this will not change over the life of the quarry. If the situation was to change it would significantly reduce the area available to users. One should note that Arlington have already promoted the site for houses on multi occasions.

Area available to Country Park users

Task	Duration years	Percentage of site	Time scale years
Phase A	9 years	26%	
Phase B	9 years	31-36%	
Phase C	9 years	31-36%	
Phase D	9 years	31-36%	
Phase E	9 years	31-36%	
Phase F	9 years	31-36%	
Phase G	9 years	31-36%	
Final restoration	0.5-1	16%	
Aftercare	5	ND	

Note - All data is from the applicants LVIA (final) ND not defined in application. CHPC has been unable to verify these areas.

As already highlighted ground and soil conditions will also reduce the area available to users within the quarry area. Due to the inconsistency of the applicants statements it's impossible to quantify how much this will reduce the area of the park available to users.

Suitability of the proposed routes

For the following section CHPC has identified the major access points to the Country Park as-

The former taxiway from Salisbury Village Ellenbrook and Hatfield

Path near Round wood from northern end of Salisbury Village and Hatfield Business Park.

Notcutts Garden Centre, Smallford
Jove Gardens, Smallford
Lawrence Close, Smallford
Footpath near Pasture View, Smallford

The evidence is contained later in the document on page 32 and appendix 1.

Length of proposed access routes

The proposed routes from Salisbury Village/Ellenbrook during phases A-B will result in considerable additional distance to access the main Country Park and this will be along less than ideal routes, beside noisy A1057 or by the noisy processing area and haul roads.

CHPC believe this will be a considerable detraction to users and therefore in turn negatively impact on resident's health and wellbeing. This opinion is supported by the study undertaken by the resident's associations and CHPC.

Users of the Country Park approaching from Smallford will be impacted from start of phase E to phase to the completion of reinstatement will have to use longer routes to access open area of the Country Park. Access from the key access points by Notcutts Garden Centre, Jove Gardens and Lawrence Close will be blocked during phase G.

Attractive to users?

HCC reg25 letter

To ensure the access strategy is appropriate and reflects the provisions of the original s106 agreement please provide further information in the form of a written document and plans clearly setting out areas for public access for each phase of the mineral working for the duration of the operation. ***To be clear****, the access strategy must provide for unfettered public access to the maximum possible areas of the park.* ***The routes must be attractive to users of the Park and delivered to a high standard.***

The area surrounding proposed quarry site suffers from high levels of noise and pollution from the existing infrastructure A1(M), A414, M25, M1, and railways which is one of the key reasons people choose or need somewhere to relax and exercise away noise and pollution. The proposed access routes beside the A1067 are simply not acceptable alternatives. These routes beside the A1057 would be used to access much of the Country Park during phases A, B, E, F and G.

As already stated, the area suffers from impacts from noise and pollution, the routes near the processing site are also considered unacceptable for users due to the levels of noise including from the Cemex site and dust. The during phases A, B, C, F, and G users of the Country Park need to pass in close proximity to the processing site are to access the larger part of the park.

During phases E and F one of the principal routes to the far side of the Country Park is heading north beside the access road and the processing area when the combined impacts of Cemex site and the applicates site will be fully exposed both visually and auditory.

Visual impact of Cemex site from the footpath running beside the proposed processing area. January 2023

For the entire working life of the quarry users must walk pass the processing area to access the only crossing of the Cemex conveyor system to access the countryside beyond. The noise from the plant and safety systems on Cemex site is clear audible in this area of the Country Park.

CHPC are unable to find any reason or evidence why the footpath requires to be closed near Home Culvert/Round Wood during phase C.

CHPC are unable to establish any commitment by the applicant as to the standard of paths and crossing points as required in HCC reg25 letter, without this **vital commitment** CHPC are very concerned this requirement has not been and will not be met.

Crossing points

Accessing the main area of the County Park

Phase	Access points	Road / haul road crossings
A	1	3
B	1	3
C	1	3
D	2	3
E	2	2 (a)
F	2	2 (b)
G	2	1 (c)

(a) The crossover on the service road is shown leading on phase E, however it is not clear if the serves any practical purpose as no footpaths are shown leading from it, and it leads directly into the quarry area.
(b) The crossover on the service road is shown leading on phase E and F however it is not clear if the serves any practical purpose as no footpaths are shown leading from it, and it leads directly on the quarry area.
(c) During this phase there will be no access from Notcutts Garden, Jove Gardens and Lawrence Close resulting in long detours.

Phase A - The crossing point near the processing site is poorly and dangerously located. The slight lines are screened by existing trees and shrubs, the route is nearer to processing area than it required. It also involves a considerable additional walking to access the main open park areas. More consideration could have been given to the access along taxiway would have resulted in a considerably shorter and safer access route.

Phase B - The crossing point near the processing site is poorly and dangerously located. The slight lines are screened by existing trees and shrubs, the route is nearer to processing area than it required. A minor change could have resulted in safer and shorter route to the main open park area.

Phase C – The crossing point near the processing site is poorly and dangerously located. The slight lines are screened by existing trees and shrubs. No evidence or reason why permissive path north of Home Culvert is closed.

Phase D - The crossing point near the processing site is poorly and dangerously located. The slight lines are screened by existing trees and shrubs.

Phase E – Long routes to main open area of the park, improved site layout would have resulted in easier access for park users.

Phase F - Long routes to main open area of the park, improved site layout would have resulted in easier access for park users. This is particular issue for users entering from northern Smallford and eastern St Albans.

Phase G – No footpath along beside access road during this phase resulting in a lack of parking for people travelling from further afield. Currently Notcutts allow people visiting the Country Park to use their car park. The alternative route is via Pastures View footpath and towards the processing site. There is no off street

parking in this area so users would need to park outside residents home in area which has high levels of street parking.

Conclusions – Crossing Points

The basic site layout is flawed in regard to maintaining public access to the Country Park, this has resulted in poor accessibility to the park throughout many of the quarrying phases. The poor location of some crossing points has added safety concerns as well.

Due to the lack of design details of the crossing points CHPC has significant concerns over the accessibility to the Country Park for those with disabilities.

The crossing of haul roads is a particular concern for those with mobility problems as they can be quite rough.

Disabled access

Our Country Park study identified use of the Country Park by people with disabilities, CHPC are unable to find evidence that consideration has been given to this group as required by English Law.

The current taxiway provides a good hard surfaced access for people with mobility problems leading into the main areas of open space and away from the impacts of highway noise. The northern routes are via narrow wicket gates over which the applicant has no control over and are unsuitable for those using mobility aids.

LVIA

4.4.1 Ellenbrook Country Park The landscape effect on the country park is identified in Appendix 02 as Moderate and Adverse due to the loss of some areas for the entire extraction period (plant site and lagoons etc.) and others (Phase A-G) on a short term basis for the phased extraction and restoration method.

It should be noted that although the entire country park is potentially accessible, in reality access tends to be concentrated along the main paths and desire lines.

Access (and recreational value) is maintained through the proposed workings by the creation of new routes around the working areas. The overall moderate landscape effect would not be significant due to the maintenance of recreational use and the enhanced nature of the restored landscape.

CHPC are unable to agree with these conclusions.

The principle open area of the Country Park is on the application site, this is criss-crossed with major and smaller paths, these are widely used even in the winter months the tracks/footprints clearly show significant levels of usage. This is evidenced in the user study.

“Access (and recreational value) is maintained”.

It is impossible to understand how experienced landscape assessor could come to this conclusion.

The Country Park which already has 25 years maturity will be destroyed and have restricted access over a prolonged period.

The access will be divided into small parcels of land with long diversions and or access via noisy routes either near a busy road or near the processing area.

The landscape will take many to recover due to the poor soil conditions already identified within reinstated phase buttressed areas.

Within the central flat area, the phases will be visible and have significant impact on the landscape and users.

Our studies

CHPC has carried out its own surveys due to Brett not "*consulting on quarry plans for Hatfield Aerodrome site with local groups regarding this application and taking any feedback." [*Welwyn Hatfield Times March 10, 2022] www.whtimes.co.uk/news/local-council/brett-aggregates-hatfield-aerodrome-quarry-plans-8745508]]

CHPC has co-operated with the resident's associations of Ellenbrook, Salisbury Village and Smallford in undertaking studies to understand the user's needs and usage of the Country Park.

The aim was to identify the routes used by people in the Country Park, other data was also collected with aim of identifying the range of activities undertaken.

The size groups were also recorded to assist our understanding of social as well as exercise and health benefits to users of the country Park.

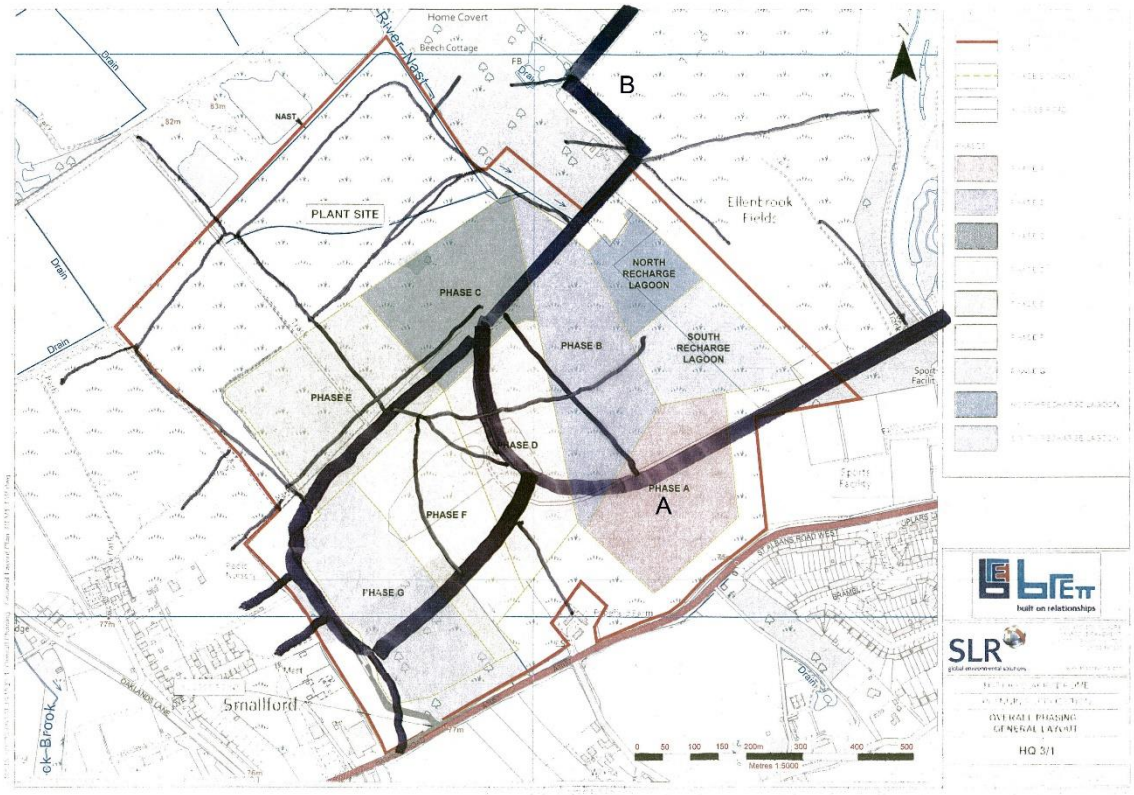
Snow tracking

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. The was undertaken on morning of 13th December 2022, so recording approximately 24 hours of activity.

The level 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 using the 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 evidence.

A considerable number of animal tracks were observed while undertaking this work crisscrossing much of the site. 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.

13th December 2022 point B near Round Wood showing the level of usage in previous 24 hours.

Usage study

Undertaken by Ellenbrook and Smallford Residents Associations (RA) and CHPC from early December 2022 to mid-January 2023.

While undertaking the study a number of users/residents pointed out that usage is significantly greater in warmer months when the days are longer.

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.

The only alternative would by undertaking interviews with users, however with Christmas, New Year, and time available this was not possible.

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 should have been expected.

Methodology

An initial walk round of site was undertaken on 4th December 2022, this identified a number of problems which needed to be resolved before the study could start. The key issues were clearly identifying people from a distance in the poor winter light and the limited resources we had available to undertake the study.

Therefore, it was concluded that the study would based on identifying the location and direction of travel rather than individual people. It was also apparent that any study we, the RAs and CHPC would miss some users due to our limited resources, dense growth along some routes and distances involved to include all routes within a short time frame.

The study worksheet was tested for 4 additional days before being released for the study.

Data bias

No route was set for this study however residents were requested to include of the County Park as possible. Early in the study and resulting from snow tracking data it become clear that we needed understand the usage along the path from Home Culvert to the northern end of Hatfield Business Park. However, this requirement may have introduced two biases into the data. The surveyed in both directions as the path leads well away from the site so the return route was the same as out bound route. Due to the low number of people recorded along this route and time taken may have biases the data by understating the average number of people in the park per hour.

See appendix 1 for the worksheet.

Results of the "Rule 6 parties" User Study

Due to the lack of engagement from Brett the study was undertaken by residents, the Ellenbrook and Smallford Residents Associations and CHPC during December to mid-January.

We recorded a significant level of use, despite the adverse weather conditions at the time.

The care taken by the recorders gives us considerable confidence in our data.

Many recorders undertook surveys along the lesser used routes which took time so we can be confident our data is an underestimate.

Along some of heavily screened route one could be within metres of a user, our recorders may have heard them but never sees them.

All recorders were instructed to only record a user when first seen.

Over the study period 45 sheets were completed.

We can be confident that at least 25 people per hour are using the Country Park during the winter months. This is likely to be greater in summer months.

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.

On the lesser used routes 87 groups of people were recorded which equates to 12.6% which considering that weather and ground conditions is significant.

During the study period snow cover lasted for over a week, and some areas were quite wet particularly the area near Home Culvert and along the site boundary with Cemex.

Average number of people using the Country Park

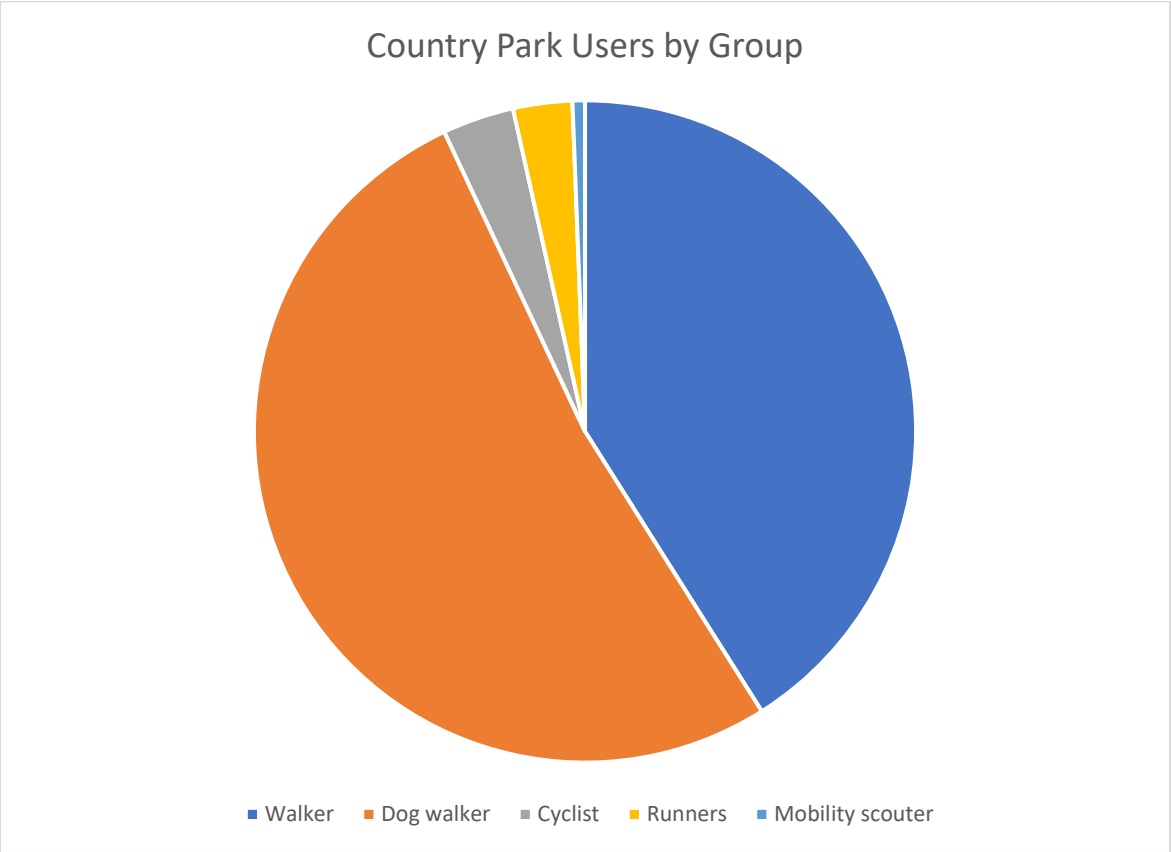
Date	start	finish	Time Duration hours	No. people	Ave. no./hr
07/12/2022	10:53	12:01	1.13	32	28.32
09/12/2022	14:20	15:51	1.52	17	11.18
10/12/2022	10:04	11:46	1.66	43	25.90
11/12/2022	14:22	15:40	1.30	34	26.15
13/12/2022	11:08	13:35	2.45	30	12.24
18/12/2022	09:58	11:35	1.62	34	20.99
20/12/2022	14:10	14:50	0.66	9	13.64
21/12/2022	12:00	13:30	0.50	14	28.00
21/12/2022	14:40	16:20	1.66	25	15.06
24/12/2022	14:45	15:10	0.50	24	48.00
26/12/2022	12:45	15:10	0.42	15	35.71
26/12/2022	12:45	14:03	1.30	52	40.00
27/12/2022	13:55	14:43	0.80	35	43.75
30/12/2022	14:40	15:55	1.25	29	23.20
31/12/2022	10:30	11:00	0.50	7	14.00
01/01/2023	10:35	12:30	1.92	45	23.47
02/01/2023	14:20	15:55	1.55	80	51.61
04/01/2023	14:20	15:58	1.63	27	16.56
06/01/2023	11:16	12:37	1.35	27	20.00
08/01/2023	09:08	10:15	1.11	41	36.94
09/01/2023	12:00	13:15	1.25	8	6.40
09/01/2023	12:35	14:42	2.15	31	14.42
09/01/2023	15:10	15:30	0.33	2	6.06
10/01/2023	12:00	12:55	0.92	6	6.52
11/01/2023	12:22	13:30	1.13	9	7.96
11/01/2023	12:35	13:05	0.50	13	26.00
12/01/2023	12:00	13:00	1.00	9	9.00
12/01/2023	12:10	12:56	0.67	13	19.52
13/01/2023	11:30	12:38	1.13	11	9.73
13/01/2023	11:52	12:20	0.47	8	17.17
13/01/2023	14:30	15:55	1.42	20	14.12
14/01/2023	09:16	11:20	2.07	31	15.00
14/01/2023	11:30	13:05	1.58	12	7.59
14/01/2023	14:35	14:55	0.33	15	45.05
15/01/2023	11:19	11:55	0.60	19	31.67
15/01/2023	11:30	12:30	1.00	24	24.00
15/01/2023	13:15	13:30	0.25	16	64.00
15/01/2023	14:07	14:25	0.30	24	80.00
15/01/2023	14:13	15:40	1.45	64	44.14
17/01/2023	12:00	13:15	1.25	12	9.60
17/01/2023	12:15	12:50	0.58	11	18.97
18/01/2023	13:01	13:30	0.48	9	18.75
Average					24.53

Types of users of the Country Park

To assist with our understanding of the use of the County Park recorders were requested to note the activity users were undertaking.

The largest groups were walkers and dog walkers. With smaller numbers required as cyclists, runners.

During the study it was noticed that a number of people were using mobility scouters also used the park, however the numbers were low during the study period and the recording only started later in the study.



Social use of Country Park

The evidence strongly points towards a strong social element in the use of the Country Park by the number of groups recorded, this is reflected in average 1.48 persons in each group.

Due to the weather in December-January when the study was undertaken this is likely to be a significant underestimate this view is supported by the comments made by users.

Size of Groups using the Country Park

Date	start	finish	Duration **hours**	No. people	no. Groups	Ave. group size
07/12/2022	10:53	12:01	1.13	32	16	2.00
09/12/2022	14:20	15:51	1.52	17	13	1.31
10/12/2022	10:04	11:46	1.66	43	36	1.19
11/12/2022	14:22	15:40	1.30	34	17	2.00
13/12/2022	11:08	13:35	2.45	30	25	1.20
18/12/2022	09:58	11:35	1.62	34	24	1.42
20/12/2022	14:10	14:50	0.66	9	6	1.50
21/12/2022	12:00	13:30	0.50	14	8	1.75
21/12/2022	14:40	16:20	1.66	25	18	1.39
24/12/2022	14:45	15:10	0.50	24	11	2.18
26/12/2022	12:45	15:10	0.42	15	6	2.50
26/12/2022	12:45	14:03	1.30	52	19	2.74
27/12/2022	13:55	14:43	0.80	35	21	1.67
30/12/2022	14:40	15:55	1.25	29	23	1.26
31/12/2022	10:30	11:00	0.50	7	7	1.00
01/01/2023	10:35	12:30	1.92	45	30	1.50
02/01/2023	14:20	15:55	1.55	80	39	2.05
04/01/2023	14:20	15:58	1.63	27	19	1.42
06/01/2023	11:16	12:37	1.35	27	20	1.35
08/01/2023	09:08	10:15	1.11	41	28	1.46
09/01/2023	12:00	13:15	1.25	8	8	1.00
09/01/2023	12:35	14:42	2.15	31	28	1.11
09/01/2023	15:10	15:30	0.33	2	2	1.00
10/01/2023	12:00	12:55	0.92	6	6	1.00
11/01/2023	12:22	13:30	1.13	9	9	1.00
11/01/2023	12:35	13:05	0.50	13	11	1.18
12/01/2023	12:00	13:00	1.00	9	7	1.29
12/01/2023	12:10	12:56	0.67	13	10	1.30
13/01/2023	11:30	12:38	1.13	11	9	1.22
13/01/2023	11:52	12:20	0.47	8	5	1.60
13/01/2023	14:30	15:55	1.42	20	18	1.11
14/01/2023	09:16	11:20	2.07	31	31	1.00
14/01/2023	11:30	13:05	1.58	12	10	1.20
14/01/2023	14:35	14:55	0.33	15	11	1.36
15/01/2023	11:19	11:55	0.60	19	7	2.71
15/01/2023	11:30	12:30	1.00	24	17	1.41
15/01/2023	13:15	13:30	0.25	16	11	1.45
15/01/2023	14:07	14:25	0.30	24	12	2.00
15/01/2023	14:13	15:40	1.45	64	38	1.68
17/01/2023	12:00	13:15	1.25	12	11	1.09
17/01/2023	12:15	12:50	0.58	11	10	1.10
18/01/2023	13:01	13:30	0.48	9	5	1.80
Average						1.49

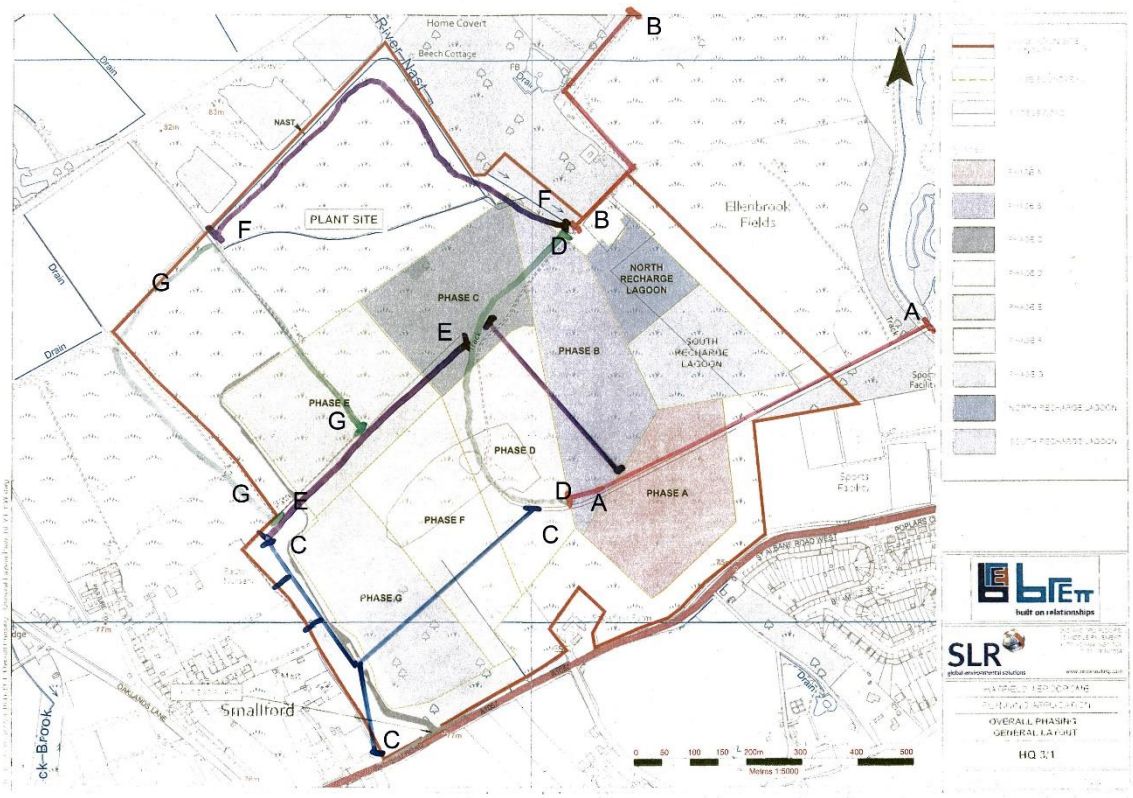
Informal data

While conducting the survey, some of the recorders chatted with users the key points made by users were-

- The importance they place on being able to access the Country Park.
- The importance of the open space of the Country Park for their mental health.
- The importance of the open space of the Country Park for those with disabilities.
- People travelling through the Country Park to and from work.
- Users in the park prior to work from 5.00am (a)
- Users in the park after work until mid-evening (a)
- Users of the Business Park exercising during midday break.
-

(a) It has not been possible to survey in the early morning and late afternoon-evening, due to the low visibility of the pre-dawn and post dusk period.

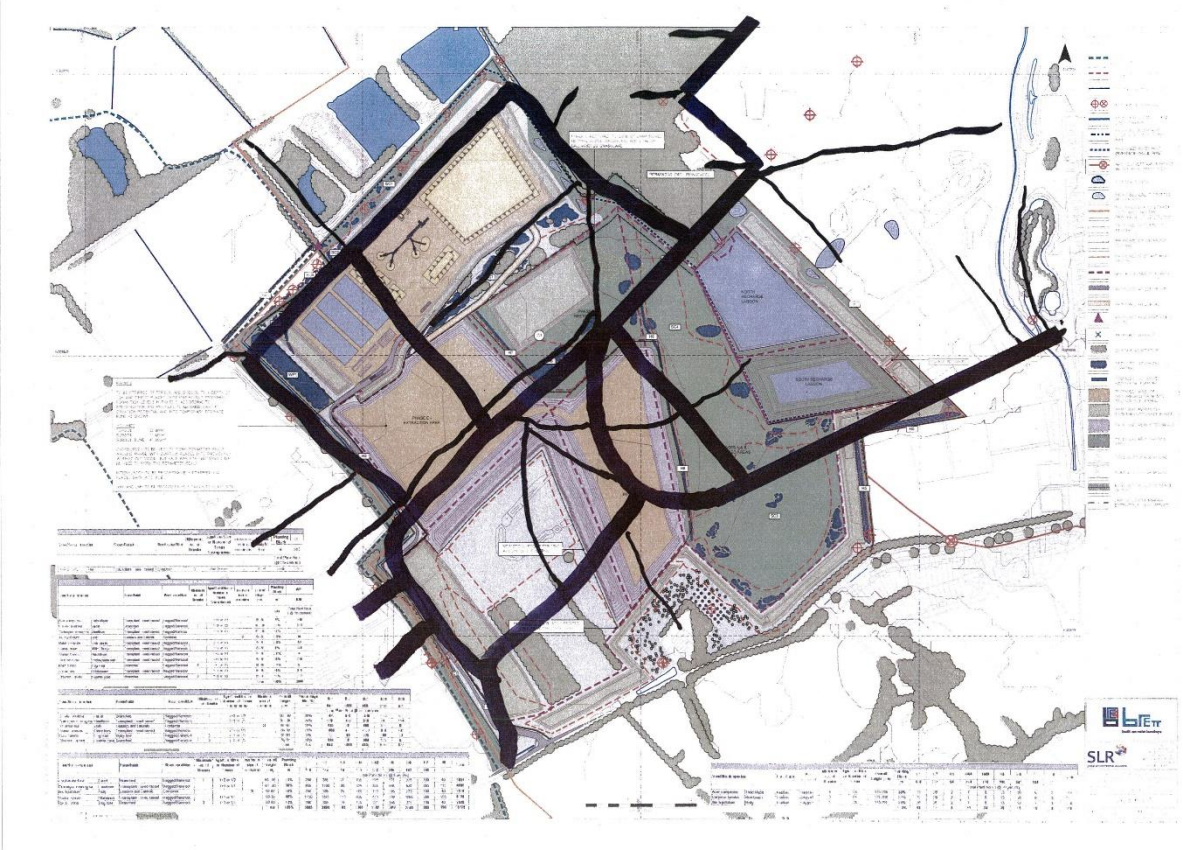
Routes used - Diagrammatic mapping.



Diagrammatic map showing the analysis sections (A- H) overlayed site layout map.

Route	Route name	Recorded no user groups
A	Hatfield - Ellenbrook taxiway access	197
B	Northern Hatfield Business Park access	38
C	Southern Smallford access routes	144
D	Central area crossing	102
E	Open area northern route	73
F	Northwest boundary route	9
G	Southwest boundary route	17
H	Shrubland enclosed central crossing	2
	Other routes	87

See Appendix 1 for diagrammatic data overlays for each stage and phase.



Diagrammatic map overlay showing the principal routes used during our study period overlayed 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.

The study data confirms the major access route to the Country Park are from Salisbury Village Hatfield and Ellenbrook route A and from Smallford route C. Smallford also has minor joining into route G.

The access from northern Hatfield and business park differs between the snow tacking 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.

Most of the users observed in the study where heading towards the central area of the park in the near the end of the taxiway.

The proposed routes to north of the processing area would clearly be not that attractive to users based on this study.

This must raise concerns throughout phases E-G for residents from the Smallford direction being able or wishing to access the park.

The only alternative routes would be past the noisy A1057 or the rear of the processing area.

Strava – Exercise data

The Strava organisation provides us with some additional information on the use of the Country Park by walkers, runners, and cyclists. Members must submit their data to be included, however it does provide an additional data source.

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

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.

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

The brighter routes show road usage which will include commuters, however records a level of cycling within the Country Park using a significant number of routes.

levels of active travel equal or higher than any other routes in the surrounding area.

Strava data records usage of the taxiway by runners (by those who share their data) on the length from the gate by Salisbury Village to the turn in the taxiway was **33829** runners.

The organised running events were pulsed during Covid, Arlington have refused the organisers permission to restart the events due to insurance problems, however this could be contrary to the terms of S106 agreement.

Reasoning why access is restricted and poorly designed.

Current Routes

Our study data confirmed that people were entering the Country Park in broadly equal numbers from the Hatfield and Smallford directions. The study data also identified the major access points to the Country Park as -

> Former taxiway from Ellenbrook - Hatfield
>
> The combined routes from Notcutts Garden Centre, Jove Gardens and Lawrence Close.

The northern route from Hatfield and Hatfield Business Park past Round Wood and Home Culvert was the second route to access the Country Park from Hatfield however the snow tracking data and study data indicated different levels of usage. It is possible as some people had stated this was people travelling to work or users in the hours of darkness.

The access route via Pastures View is less important than the other routes from Smallford.

The evidence is overwhelming that the area southeast of a line from Lawrence Close to Home Culvert (in front of the hedgerow) is the most heavily used. The area northwest has a lower level of use, this may partly be due to distance from Hatfield.

The paths through the northwest area indicate a level use but the study data failed to record it. This may be due to adverse walking conditions in this area with some paths underwater.

The study data indicates that people are currently using many different routes, however many are focused towards the central area broadly around the end of concrete taxiway.

Proposed Routes

In simple terms it would be very difficult to design the quarry layout and the related access routes in a less satisfactory manner than Brett propose for users to meet the access to the Country Park requirement.

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.

HCC reg25 letter

'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.'

Attractive

Over many phases the proposed access routes are simply not attractive to users. Brett has failed to understand the importance of the Country Park as a quiet area within the noisy environment of this area of south Hertfordshire. This area has more busy motorways, roads, and railways than almost any other area in the county.

The applicant therefore has proposed **ALL** the access routes run either beside the busy noisy A1057 or around the noisy processing area. Quite simply not understanding people's needs for quiet and relaxation, highlighting their lack of community engagement.

The length of the alternative routes is of considerable concern, getting to open areas of the Country Park will take so long, require considerable effort, along unattractive routes so most residents will simply not bother and in turn their health will suffer both physical and mental.

Unfettered public access to the maximum possible areas of the park.

As already highlighted, due to the need to manage the risk to the water from bromate contamination this results in the need to construct buttresses and seals around each phase. CHPC believe this will result in flooding and waterlogged ground so making it unavailable to users for many months of the year.

As stated above CHPC believe that the proposed routes will be a major deterrent to the use of the Country Park.

The location of the crossing points form a major restriction for accessing the Country Park, this due to the poor location of these crossing points.

CHPC also has concerns over safety and for those with disabilities.

Conclusions – Usage of the Country Park

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's 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 would not be delivered if the application is approved.

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 without engaging with the community. Brett should have re-evaluated the entire site with replanning access to the Country Park being a material consideration.

The Location of the processing site, the lagoons, bunds and the layout of the phases are all major restrictions to access to the Country Park

In CHPC's view it has prepared by quarrymen with little regard for public access as required by S106 agreement.

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 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.

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 health both physical and mental.

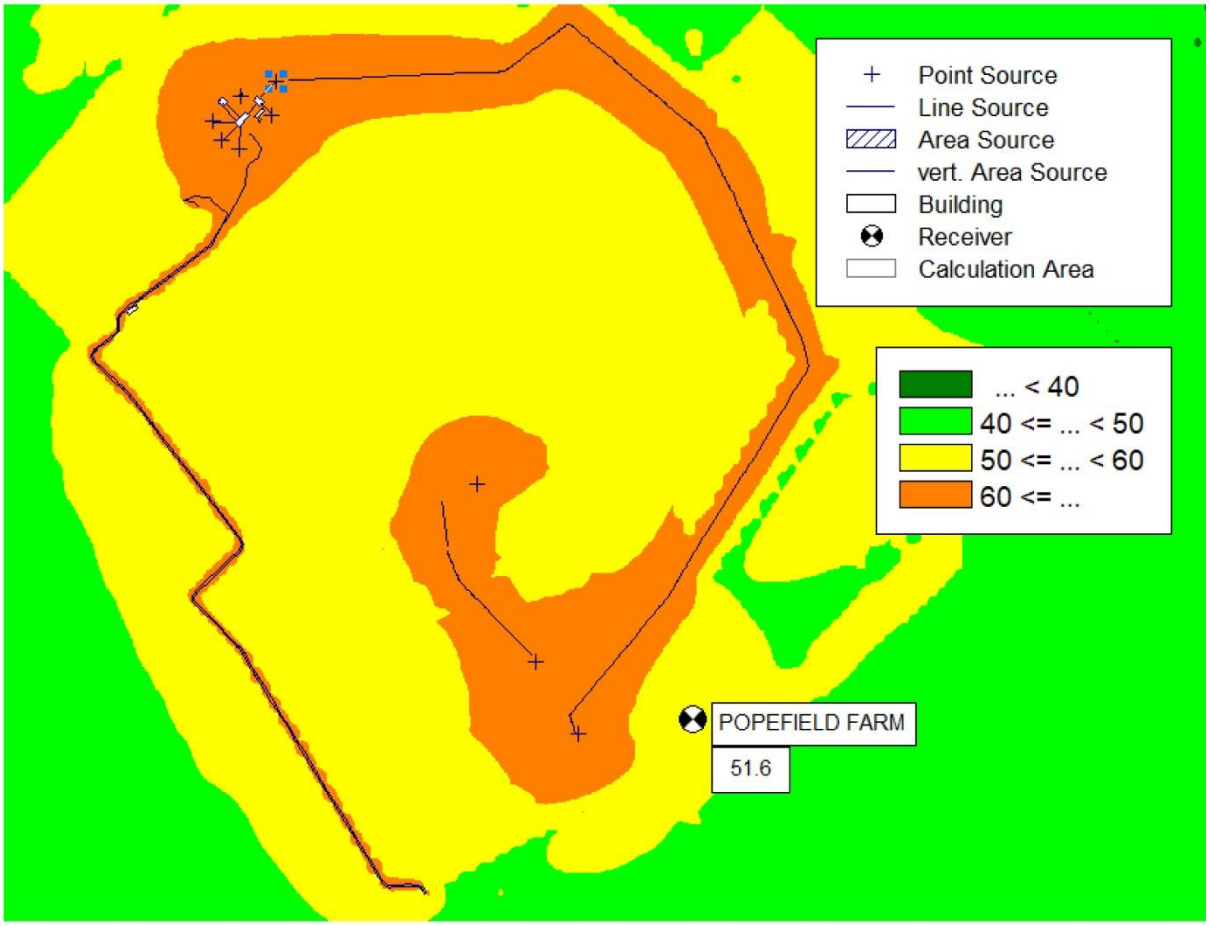
The access proposals to the Country Park are so fundamentally flawed that application must be refused for these reasons alone.

Noise

CHPC notes that the applicant's data only relates to impact on nearby homes and does not supply any 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. CHPC also notes the concerns raised by Welwyn Hatfield BC in relation to the noise assessments the concerns raised by WHBC on their reliability.

The applicants noise map of the entire site also raises concern over impact on users of the Country Park with levels between 10-20db above the ambient levels.



Robert Brett and Sons Ltd Hatfield Quarry, Popefield Farm - Noise Impact Assessment Figure 7-1 PPG Daytime LAeq,T Specific Sound Level – dB(A)

HCC reg25 letter states- *The routes must be attractive to users of the Park and delivered to a high standard.*

The user study has already confirmed a high level of use of the Country Park during the day, at the times when the quarry will be working. This study by the applicant confirms the high levels of noise user will experience while in the park.

The HCC reg25 letter is very clear that the park must be attractive to users. The proposal with this level of noise will be a significant deterrent, particularly with all the other factors already identified. **The park will not be attractive to users.**

Heritage

Popefield Farm

HCC reg25 letter

'The Inspector decided the current setting of Popefield Farm makes some contribution to significance of the listed building, and although the appeal scheme would result in less than substantial harm to the significance of the heritage asset, he indicated nevertheless the proximity of the bunds and associated activity in Phases A, B, D and F would diminish appreciation of the farmhouse and its context for a substantial period of time.'

Hatfield Quarry Phase timing (prepared by CHPC based on data in LVIA report final))

	Time scale years								
Duration	4.5	4.5	4.5	4.5	4.5	4.5	4.5	4.5	0.5-1
	4.5	9	13.5	18	22.5	27	31.5	36	37
Phase									
A									
B									
C									
D									
E									
F									
G									

Key

Activity	
Quarrying	
Phase Reinstatement	
Processing area clearance & reinstatement	

Each phase has 3 stages of which one is planning followed by two active stages.

Stage 1 Preplanning including water sampling, little or no site work so have not included in timeframe
Stage 2 (first active stage) quarrying, lasting approximately 4.5 years.
Stage 3 back filling and reinstatement, lasting approximately 4.5 years.

However elsewhere 5 years is quoted for both quarrying and reinstatement.

Appexdix02 GWWMP final

4.4 Upper Mineral Horizon The UMH sits above the low permeability IB which is a perching layer for overlying groundwater in the UMA. The UMA will be dewatered inside each phase or sub-phase to allow the mineral to be worked dry.

The outer sidewall geological barrier/clay buttress will be constructed using standard engineering practice and will be subject to Construction Quality Assurance (i.e., specification, CQA Plan, independent supervision, and validation report).

4.4.1 UMH Outer Perimeter Buttress

Each phase will be constructed with an outer perimeter buttress as shown on Drawing 11. The outer perimeter buttress of the mineral development site will remain in place in perpetuity, whereas internal buttresses will be progressively removed, and materials reused as the phases are sequentially developed

UMH Outer Buttress and Back Drain

The back drain will be constructed to manage the groundwater level and maintain the stability of the landfill perimeter buttress until site restoration. The drain shown on Drawing 11 comprises a collection pipe and a granular blanket across the cut face of the UMH and partially the overburden. The recorded UMA groundwater level will be reduced by c.1m by gravity flow and/or pumping and will discharge to the mineral processing area silt lagoons to provide mineral washing water with any excess transferred, after settlement, to the UML for recharge back into the UMA.

LVIA report final

2.3.5 Restoration around Popefield Farm

By the time extraction in Phase D reached the closest point to Popefield Farm, Phase A would have been restored for over 13.5 years, with the nearest areas restored for longer (restoration would start form the southern part of Phase A and work northwards following the extraction direction). The landscape of Phase A would be covered in grass with areas of scrub and tree planting and a long hedgerow along the western boundary of Phase A and B, as shown on the Drawing HQ 3/12 R (Phase E) and HQ 3/16 R (Final Restoration Plan) creating an open rural landscape. No views from the farm house would occur towards Phase D due to the large barn present on the Popefield Farm site which blocks such views. The areas of Phase F and G would remain unworked with grassland and scrub present within a rural landscape. The bund and planting around the boundary of Popefield Farm would maintain ground level visual screening to the north of the barn.

<u>The statement in 2.3.5 is incorrect.</u>

A buttress is constructed around each phase before to control the water level before any quarrying starts, therefore this would indicate the entire area would be cleared then the buttress constructed. In the restoration stage of phase the area must be landfilled, covered with soil and seeded this going to be well into the 4.5 year restoration period even if it started in area neatest to Popefield Farm.

As Phase D was restored the mineral working would have extended into Phase E. By the time Phase F reached the closest point to Popefield Farm, Phase D would have been restored for over 9 years in the nearest areas to Popefield Farm. The landscape of Phase D would be covered in grass with areas of scrub/tree planting and a long hedgerow along the western boundary of Phase D and across Phase C, as shown on the Drawing HQ 3/13 R (Phase F) and HQ 3/16 R (Final Restoration Plan) creating an open rural landscape in conjunction with Phases A and B. The area of Phase G would remain unworked with grassland and scrub present. The bund and planting around the boundary of Popefield Farm would maintain ground level visual screening.

<u>The statement in 2.3.5 is incorrect.</u>

Buttress are constructed around each phase before to control the water level before any quarrying starts, therefore this would indicate the entire area would be cleared then the buttress constructed. In the restoration stage of phase the area must be landfilled, covered with soil and seeded this going to be well into the 4.5 year restoration period even if it started in area neatest to Popefield Farm.

CHPC believe that construction of bunds will have a significant impact on the setting of Popefield Farm from the early days of construction. And that the setting heritage asset will be harmed, over a prolonged period from start of phase A to the completed restoration of phase F with at best 4.5 years gap while phase C is quarried.

Green Belt and Visual Impacts

NPPF

147. Inappropriate development is, by definition, harmful to the Green Belt and should not be approved except in very special circumstances.

148. When considering any planning application, local planning authorities should ensure that substantial weight is given to any harm to the Green Belt. 'Very special circumstances' will not exist unless the potential harm to the Green Belt by reason of inappropriateness, and any other harm resulting from the proposal, is clearly outweighed by other considerations.

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

Impacts

CHPC analysis of the impact on the Green Belt the quarry will have will be significant, and over a prolonged period of approximately 40 years, and will be contrary to NPPF para 150 to preserve its openness. This view is conclusion in identical to SADC & WHBC consultation responses.

The gap in development between St Albans and Hatfield along the A1057 in very narrow with a considerable risk coalescence of St Albans and Hetfield which is contrary to objective 2 of Green Belt policy.

Impact on the Green Belt will be during the construction, quarrying and restoration phases.

1) The entrance to the site from the A1057 at Smallford

   The gap between the town is at its narrowest at this point approximately 1.3km

   The removal of the existing mature hedgerow, the widening of the roadway to accommodate the filter lane together with access road and gateway would have significant urbanising influence on the area even with proposed mitigation will still have very significant impact due to the nature of development on A1057 from Colney Heath lane this edge of Smallford.

2) The large-scale processing area
   - Large scale
   - Height
   - Visual impact on flat plain – loss of existing tree & shrub screening
   - Duration 35 plus construction and decommissioning time

3) The barren industrialized working areas.

Development of Evidence for Welwyn Hatfield Local Plan:

Green Gap Assessment Final Draft Report. Prepared by LU August 2019

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.

The evidence from the Welwyn Hatfield plan, St. Albans DC and Welwyn Hatfield BC also support the view this application would be harmful to the Green Belt.

Construction Phase Site Establishment

During this stage the impacts will be cover most of the site, and the impacts will last be many years while landscape recovers.

> **Access road** – removal of the trees and hedgerow on A1057 to gain access with road to processing site visible on what is basically a flat site.
>
> **Processing site** – large scale clearance and construction.
>
> **Haul roads** – while only one is shown its unclear if more will be required to form the bunds. However, any haul road will draw the eye to areas of construction therefore highlighting the areas of harm.
>
> **Lagoons** – large scale construction over a prolonged period which may also require additional haul roads to move the soil to other parts of the site including bunds.
>
> Based on observations of other sites the total width is likely to be at least twice that of the bund.
>
> **Bunds –** these effectively encircle the entire site, this will involve large scale clearance of existing trees & shrubs to form construction area, working area and related haul roads.

Anyone wishing to enter the Country Park will have to cross one or more of these working areas.

CHPC believe that level and coverage of the proposed work it will effectively turn the entire site into one industrial working area from user's visual perception.

Even in the yet to be quarried the impact will last for many years until the landscape recovers or the mitigating planting makes satisfactory growth.

Final restoration

The applications LVIA statement that this will only impact **16%** of the site looks surprising and a gross underestimate when the areas of restoration are considered.

It also differs from construction phase when it's stated that **26%** of the park would be impacted with very similar in areas requiring work.

> **Access Road** – short length retained and car park for parks users constructed the remainder removed.
>
> **Processing area** – the entire site cleared and reinstated.
>
> **Lagoons** – re-modelled into landscaped lakes.
>
> **Reinstatement of Nast**
>
> **Bunds** – removed and soil used for reinstatement. This will require a working area beside bunds and haul roads to transport the soil along.

During this stage the impacts will be cover much of the site, and the impacts will last be many years while the landscape recovers.

CHPC are very concerned that the applicant's statement grossly under states the area impacted (%)

In fact it will impact on the entire park and users will have to cross through works to enter the park.

LVIA Landscape Visual impact Assessment

CHPC are very concerned over repeated errors in the LVIA as already stated.

LVIA final

4.3.6 Do Nothing Scenario If the current planning application is not permitted, the site would most likely be worked for minerals at some other stage due to its allocation in the Minerals Local Plan. Minerals can only be extracted where they occur, and the reserves present have been identified.

If mineral use did not occur, pressure would increase on the site for the allocation of housing within the Green Belt area, most likely in the form of expansion from Smallford.

Without the proposed development the landscape is likely to continue to develop scrub and subsequent woodland at a quick rate unless management of the landscape is established.

CHPC believe the above statement is incorrect.

a) **The S106 agreement** does NOT protect any of the Country Park from development housing, offices or factories during the term of the lease.

In a worst-case scenario there would almost be no comparable space for recreation for residents of Smallford, Ellenbrook or Hatfield West

Only Home Field and Cut Field, covering less than 10% of the whole Trust lease area, would remain in the Trust control.

b) **Loss of site to housing** – this is not evidence based, the site forms several key functions of Green Belt policy
To prevent neighbouring towns merging into one another
To assist in safeguarding the countryside from encroachment

However, the landowner continues to promote the eastern half for housing at every opportunity.

c) The Trust should have been formed over 20 years ago.

Without the formation of the trust the management of Country Park has been in limbo with the owners Arlington undertaking minimal maintenance.

It therefore impossible to form any opinion at the future of the park.

d) The application site is within the current Hertfordshire Mineral Plan, however that does not mean this will remain in the plan following later reviews.

Highways and Transport Sustainability

The site has no access to sustainable transport links, rail, river, or canal therefore is totally dependent upon lorry transport which is contrary to Policy 16 Hertfordshire Minerals Local Plan adopted 2007.

There will be increased transport mileage due to the concentration of all Hertfordshire's sand and gravel being supplied from one small area within the southwest corner of the county when other sites are available, which would reduce transport mileage *ref. Hertfordshire Minerals Plan Proposed Submission January 2019.*

This proposed site is one of the least accessible sites to the area of East Herts which is in the mineral plan forecasts to have the highest growth and hence highest demand for minerals and along routes which already suffer from considerable delays. A414 Hatfield and Hertford, A1(M) junctions at Hatfield and M25, M25/A10 junction and A10. East Herts does have promoted sites within the Mineral Plan.

This application fails to meet Hertfordshire Mineral Plan objective 4 in promoting sustainable transport and relies purely upon lorry transport.

The site also fails to meet HCC climate objective in reducing Co2 emissions as alternative sites would reduce transport mileage thus Co2 emissions because they are closer to where the minerals will be needed.

Local Road network

CHPC have considerable concerns on traffic impacts on local roads. Even if as in the applicant's statement that most vehicles will A1057 to Hatfield and then use A414 or A1(M) the impact on locals will be considerable.

All the roads to and from the site run through residential areas, including those to Hatfield the site is also within St Albans 7.5-ton weight limit zone.

From a resident's perspective the area has poor or non-existent enforcement of HGV weight limits with lorries regularly illegally travelling through restricted zones.

All the output from adjoining Cemex site is dispatched from Oaklands Lane Smallford with an already agreed up to 300 vehicles movements per day. This is along the same road network, therefore, much of Hertfordshire mineral output already uses these roads.

Impact from adjoining quarry sites

Cemex

Oaklands Lane Smallford limit 300 vehicle movements per day 150 in each direction routes not defined, approval decision notice 9th September 2021 (ref 5/1789-20)

Fuezefield Coopers Green Hatfield limit 250 vehicle movements per day 125 in each direction, routes not defined, approval decision notice 9th September 2021 (ref 5/1789-20)

A1057 St Albans Road Smallford to Hatfield

**CHPC have concerns about the turning from A1057 into the site near the village and the
Garden Centre.**

It would appear that the proposed filter lane design could only accommodate two lorries at a time.

Due to the proposed number of lorry trips, the risk of causing significant delays to through traffic is greatly increased.

Tyttenhanger Quarry landfill site Coursers Road Colney Heath this has wheel cleaning facilities which are used, but the road still requires regular cleaning by a road sweeper which travels quite slowly. While in operation long queues form behind the sweeper, we can find no evidence this has been considered. This is normally worst following rain when the mud can make the road extremely dangerous.

The St Albans Road (A1057) has significantly higher volumes of traffic than Coursers Road therefore the resulting delays would even more significant.

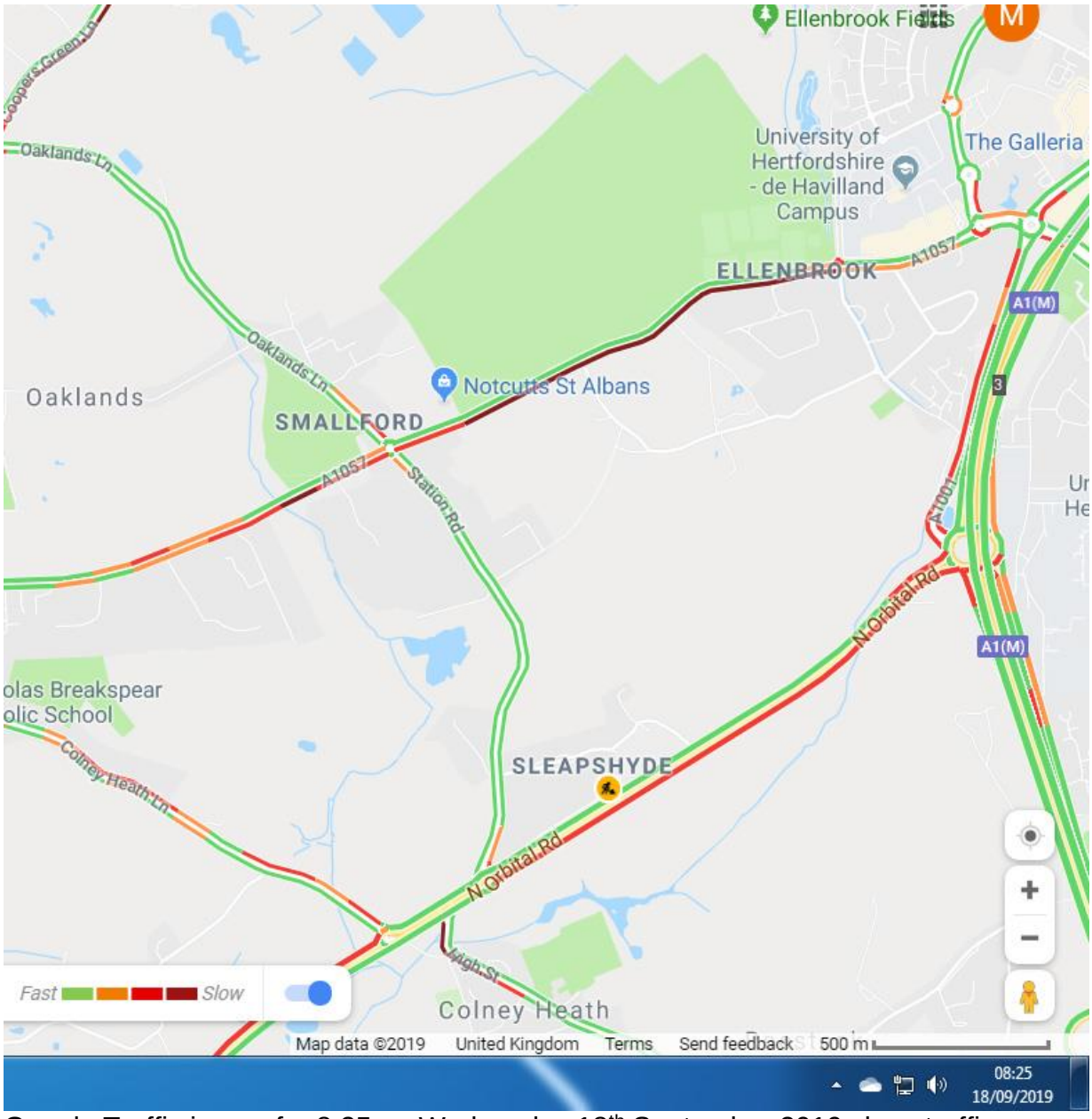
Residents' experience, Google traffic mapping and the traffic data for the emerging Welwyn Hatfield Local Plan have all identified problems on St Albans Road (A1057) between Smallford and Hatfield Comet round-about.

The most significant delays occur at peak times, any delays to vehicles entering the site or resulting from road cleaning operations would result additional significant delays.

Comet Way (A1001) and links to road network A1(M) and A414

The only links to the strategic road network are at either Hatfield North A1(M)-A414 Oldling's Corner or Hatfield south A1(M)-A414 University roundabout.

Residents and road users in the area know that the A1057-Comet Way, A1057-Mosquito Way, A1057 Ellenbrook Lane cause peak hour delays while the two A1M-A414 junctions cause considerable problems as identified in HCC and Welwyn Hatfield documents.



Google Traffic image for 8.25 on Wednesday 18th September 2019 show traffic delays along much of the proposed access routes.

The current evidence is that these are highly sensitive to changes in traffic flow and volumes and currently suffer from considerable delays.

From the evidence available there are currently significant delays at both A1(M) and A414 junctions at J3 Hatfield south and J4 Hatfield north.

From the evidence in the Welwyn Hatfield Local Plan transport assessments, they conclude that there are limited opportunities to significantly improve these junctions.

Junction 3 would appear to have the most significant delays together with least opportunities for improvement this also provides the best links to M25 and strategic road network.

Sustainability

Hertfordshire Mineral and Waste Plan (Reg18)

Policy 1: Climate Change Proposals for minerals and waste management development must demonstrate how they have incorporated mitigation measures to minimise future effects of climate change and how adaptation and resilience measures to potential climate change have been incorporated into the design. Measures will vary depending on the particular circumstances of each proposal but should, on a proportionate basis, take account of the following as a minimum:

a) location, setting and orientation;
b) renewable energy (use and creation);
c) minimising greenhouse gas emissions;
d) efficiency of plant, machinery and buildings
e) on-site water efficiency;
f) managing flood risk;
g) restoration and after-use (where appropriate);
h) the use and production of secondary and recycled aggregates; and
i) maintaining and enhancing ecosystem services.

Applicants should submit details and reasoning of any measures that have been considered and included within a Climate Change Statement, having regard to relevant legislation and guidance.

The evidence clearly shows that the application site fails to meet the Mineral and Waste Plan Policy 1 c.

The bulk of Hertfordshire's sands and gravels are being produced and dispatched from one small area in Hertfordshire.

The Mineral Plan states that east Herts is expected to have highest level of house building and thus demand for minerals.

A significant area of the application site is covered in trees and shrubs while they are only 20-30 years old, but they will continue to grow. Many trees will be 60-80 years old in the later phase F-G.

Oak one principal species found in the park indeed within Colney Heath parish does not reach commercial grade until about 100 years so the trees are unlikely to of commercial use. The trees and shrubs contain a considerable amount of stored carbon. CHPC can find no explanation how the removal of these will be managed.

If they are burnt on site, they would release a vast amount of Co2 as well as high level of particulates, or they could be shredded and composted again with would release a large amount of Co2 but over a longer period.

The total amount of Co2 would greater due power required to shred them.

Either way it would be contrary to Mineral and Waste Plan Policy 1.

Cumulative Impacts

CHPC are very concerned about the cumulative impacts from quarries in the area.

The parish of Colney Heath is already negatively impacted by more quarries and waste processing sites including landfill than any other parish in Hertfordshire. While some sites are outside the parish boundary the access or distribution is through the parish. (CHPC response to Minerals and Waste Plan reg18 consultation)

We reference the following documents-

National Planning Policy Framework rev 2021 (NPPF). Para 210, 211

Hertfordshire Minerals Plan Adopted March 2007

MINERALS POLICY 11 ~ CUMULATIVE IMPACT

Development which would result in an unacceptable cumulative impact on the environment of an area either in relation to an individual proposal having regard to the collective effect of different impacts, or in relation to the effects of a number of minerals developments occurring either concurrently or successively will not be permitted.

Hertfordshire Minerals and Waste Plan – Reg18 2021

Policy 16: Landscape and Green Infrastructure
Policy 18: Historic Environment
Policy 19: Protection and Enhancement of Amenity
Policy 20: Health and Wellbeing

Hertfordshire draft Minerals Plan: -

- Appearance, quality, and character of the landscape.
- Biodiversity.
- Geological interest.
- Flood risk and flood alleviation
- Quality of the water courses, groundwater and surface water
- Best and most versatile agricultural land; and
- Land stability.

Built Environment:

- Delivery of strategic non-mineral Local Plan allocations
- HGV movements

Historic Environment:

- Heritage and archaeological assets; and
- Social, cultural, economic and environmental benefits of conservation.

Human Health and General Amenity:

- Unavoidable noise, dust and particle emissions and any blasting vibrations and
- Public Rights of Way

Transport Networks:

- Local roads
- Primary Route Networks
- Safety and congestion
- Additional trip generation; and
- Access to and effective operation of the Transport Network

Aviation Safety

- Risk of bird strike within the Aerodrome Safeguarding Areas around London Luton Aerodrome and London Stansted Aerodrome.

Brett's Planning statement acknowledges that two mineral works (Cemex and the application site) are in close proximity would be considered cumulative impact (13.9/13.10).

Brett's statement also implies that plants sited together with associated infrastructure of quarry works would be considered a cumulative visual effect.

Planning Guidance - Minerals

How should mineral planning authorities assess the cumulative impact of minerals development?

Some parts of a mineral planning authority area may have been subjected to successive mineral development (such as aggregate extraction or surface coal mining) over a number of years.

Mineral planning authorities should include appropriate policies in their minerals local plan, where appropriate, to ensure that the cumulative impact of a proposed mineral development on the community and the environment will be acceptable.

<u>The cumulative impact of mineral development is also capable of being a material consideration when determining individual planning applications.</u>

Smallford Pits

Smallford Pits, now owned by Hertfordshire County Council (HCC), to the south of Smallford quarried pre 1939 evidenced by 1939 arial photos and still not fully reinstated.

Mineral working started in the mid-1930s the exact date is not known but by 1939 the working was well established as can be seen from the arial photo. These sites were former gravel pits filled with commercial, household, and inert waste from 7th September 1945 to 8th September 1976. During the early phase of the back filling mixed waste from London was dumped on the site. The standard of backfilling is very variable with much of the site still showing signs of construction waste. Access is still restricted to the paths with hazard notices on some routes.

The routes used by lorries is not known but residents had restricted access during the active phases mid 1930s until September 1976, and still have some restrictions due to the nature of the backfilling approximately 85 years from the commencement of work.

<u>Loss of amenity</u> – Access has been restricted from 1930 to 1976 due to quarrying followed by backfilling or tipping operations. From 1976 to the present day many activities are still restricted due the current state of site as identified by the warning signs and site inspection. It is acknowledged that the site is slowly recovering now, but some activities remain restricted.

Cumulative impacts from Smallford Pits

Traffic – mid 1930s to 1976 full routes are not known.

Cumulative impact from traffic about 40 years.

Cumulative impact loss of amenity minimum 70 years but still significantly restricted 85 years after quarrying commenced.

Hatfield Quarry (Cemex)

Cemex Hatfield (Oaklands Lane, Smallford) Work started in 1960s on this site and is still an active quarry site with mineral processing facilities, bagging plant and concrete mixing plant.

The current quarry operations are some distance to the northeast of Smallford and minerals are carried to the plant by conveyor. The earlier workings were much nearer to Smallford as shown on the EA map. Most of the output from this site must go through Smallford due to 7.5-ton weight restrictions on roads in St Albans and on bridge in Station Road over the Alban Way.

As Cemex already have approval for extraction until 2030 on its new working area which are all processed via Oaklands Lane.

Water supply – Cemex when working the minerals in the area above the area of the contaminated aquifer are only allowed to excavate the upper mineral horizon. Also a very strict monitoring regime is place, and despite the care undertaken by Cemex residents are still concerned about any risks to the water supply.

Traffic – most lorries must enter and leave the site via Oakland Lane Smallford and the St Albans Road (A1057) Ellenbrook due to weight restrictions in St Albans and Station Road Smallford.

Dust and noise – dust from quarrying when areas along Oaklands Lane and adjoining the village were worked. Dust from vehicles since 1960s and continuing today, and this will continue as the only HGV access is via Smallford/Ellenbrook unless delivering inside the St Alban weight limit zone.

Noise – From this site is clearly audible on the application site, the level of noise does depend upon the wind direction. Noise from the processing equipment and safety alarms are the most noticeable. CHPC are unable to find any assessment or consideration of the noise within the Country Park by the applicant.

Loss of Amenity – Due the business units along Hatfield Road (A1057) and the restricted access to land of Oaklands College the area to the north and east of the village are some of the prime areas for exercise and relaxation for residents of Smallford. The access and visual impacts have changed with the phases of quarrying starting in 1960s and still continues.

Cumulative impacts from Hatfield Quarry Cemex Oakland Lane

Lorries on using one route through Smallford and Ellenbrook from 1960s to 2030 a period of 75 years.

Dust and noise from 1960 to 2030, 75 years.

Loss of amenity from 1960 to 2030, 75 years.

Oakland College (rear of St David's)

This is also on Oaklands Lane opposite to the current Cemex site. Little is known about the history of this site. It was worked pre-1940 and shows clearly in 1939 arial photo EPW011643. The site is also recorded on the EA website as backfilled land.

Cumulative impact

Quarrying all factors - pre-1940-time scale not known.

Colney Heath & Roehyde (A414)

Active pre-1939, now back filled 16th April1947 - 30th November 1966 Colney Heath pit and 16th June 1977 - 15th October 1984 Roehyde pit. While the working had limited impact on Smallford, the resulting traffic had an impact on the wider area.

Colney Heath - Church Lane

An old quarry site now fully backfilled. In our view would have had limited impact on Smallford.

Tyttenhanger Pits

Large scale active workings, limited impact on Smallford but a significant impact on traffic on A414 including A414 A1M junction Hatfield south or the University roundabout and dust from lorries leaving the main site.

Proposed Quarry at former Hatfield Aerodrome (the application site)

Cumulative impacts

Traffic – The proposed route for HGV uses A1057 St Albans Road from Smallford to Hatfield via Ellenbrook. The A1057 is currently also used for most of the heavy traffic leaving and entering Hatfield quarry (Cemex) due to weight limits in St Albans area. The site entrance is located close to Smallford, just beyond Notcutts Garden Centre.

The impact will last 32-40 years depending on which document you believe, but it's also stated that only if they achieve the expected extraction rates. As the route is also used by the Hatfield quarry the total from the two sites would be a minimum 1960s – 2053 88 years.

The data we have found and collected shows significant peak time delays along this road. The A1057 already has planning approval for up to 300 HGV movements per day when added with the proposed site 174 would take the quarry related HGV trips up to 464 per day or 1 lorry every 85 seconds throughout the working day from 7.00am to 6.00pm for what is substantially a residential road the impact would be very significant.

Dust and noise – While onsite measures are in place to control noise and dust the Cemex site Oaklands Lane and Tarmac landfill site at Coursers Road Colney Heath demonstrate the issues of dust and noise from lorries. These sites have good onsite vehicle washing facilities, but the local road have considerable volumes of fine dust despite efforts by the operators to clean the highway. The long-term exposure to this dust could have negative impact on health.

Cumulative impact of 32 years is the quoted duration of quarrying but its stated only if they achieve the expected extraction rates. As the route is also used by the Hatfield quarry the total from the two sites would be a minimum 1960s – 2053 88 years and a maximum of close to 100 years.

Location of nearest homes & distance to edge of proposed site

Station Road Smallford 137m
Oaklands Lane Smallford 220m
Jove Gardens Smallford 125m
Lawrence Close Smallford 100m
Popefield Farm (St Albans Road) Smallford 45m
St Albans Road Ellenbrook

Local facilities and distance to edge of the proposed site

Three Horseshoes PH outdoor sitting area 75m
Notcutts Garden Centre 15m
Jove Garden green space 15m
Lawrence Close green space 15m
St Albans Rugby club 300m
University of Hertfordshire sport pitches Ellenbrook 5-10m
Open space Ellenbrook Crescent 440m
Ellenbrook Recreation Ground and Play Area 610m.

In the environmental assessment considering dust the forecast was for no significant change at 250m, but many of the sensitive locations are well with that radius.

Loss of Amenity – The proposed quarry site is on the site of the Country Park which was setup as part of a S106 agreement following the closure of the airfield and the resulting development of Business Park.

Most of the land to the northeast of Ellenbrook towards Hatfield is developed and has a strong urban feel.

The Ellenbrook estate only has small green space known as Ellenbrook Recreation Ground and Play Area. The area to the east has A414 and the A1M which restrict onward movement. The area to the southwest is more rural and is accessed via Alban Way. Alban Way is combined pedestrian and cycleway some pedestrians feel uncomfortable using it due the high-speed cyclists.

The Country Park is a safe and well used open space popular with many residents as it currently provides strong rural feel in what is otherwise heavily urbanised area.

The importance of exercise and being able to explore quiet rural areas has been demonstrated during the covid lockdowns. This area plays an important role for the local residents.

The car park at Notcutts Garden Centre is used by people travelling from further away to park in, so they can access the country park. If the quarry is developed access would be restricted or considerable extra distance could be needed to walk before experiencing the countryside. It is understood the Notcutts have agreed the use of their car park while the Garden Centre is open.

Cumulative impact – 32 years plus for the residents of Ellenbrook dependent upon the quarry keeping to its schedule. For Smallford resident the period would be longer 1960s – 2053, 88 years again dependent upon the quarry keeping to its schedule, so likely to be closer to 100 years.

Legal Framework

The NPPF identifies that cumulative impact is a material consideration when determining mineral applications, and it also indicates that the impacts resulting from such should carry considerable weight when they are considered with other factors.

The Hertfordshire Mineral Plan Adopted March 2007 in 'Policy 11 Cumulative Impact' includes cumulative impacts as a consideration that must be considered.

The policy also continues to state that any development that has unacceptable cumulative impact on the environment of an area either in relation to an individual proposal having regard to the collective effect of different impacts, or in relation to the effects of a number of minerals developments occurring either concurrently or successively will not be permitted.

The same Mineral Plan identifies land at former BAE aerodrome as a preferred site but fails to show any consideration as to how it meets policy objective 11, this is rather alarming considering the proposed site adjoins a large-scale existing site.

The current draft Hertfordshire Mineral Plan 2019 has a similar policy 13 which is broadly similar but contains a little more detail in what factors need to be considered.

This draft Mineral Plan again includes the Former Hatfield Aerodrome site as a preferred site but again fails to state why the proposed site meet the objectives of Policy 13.

Therefore, the reader of either of the above Hertfordshire Mineral Plans would have no understanding if the proposed site meets the Cumulative Impact policies in either document.

Therefore, one should conclude the inclusion of Hatfield Aerodrome as a preferred site is unsound.

Timescales

Neither the NPPF or Hertfordshire Mineral Plans help us when considering timescales over which cumulative impacts should be considered, other than not concurrently or successively in the Hertfordshire Mineral Plan.

Brett's statement also implies that plants sited together with associated infrastructure of quarry works would be considered a cumulative visual effect.

As the proposed quarry would result in both concurrent and successive mineral quarrying at adjoining site neither would fail to meet Hertfordshire Mineral Plan policies, policy 11 adopted, policy 13 draft Minerals Plan.

When all the factors are considered well over 100 years in and around one small village there is a long-term cumulative harm.

Cumulative Impacts

Quarrying

Smallford Pits and Oaklands were operating in the 1930s, both close to Smallford. The proposed new quarry, again close to Smallford, would operate for 30-40years giving about 120 years of quarrying in Smallford area. Continuous quarrying and related activities since the 1930s we believe is a long-term cumulative impact on the residents.

Dust

Both dust from mineral and vehicles cause long term harm, the evidence suggests that there is no safe level of crystalline silica dust. The assessments are for current levels rather than in longer term, there is no proof that long term exposure to dust resulting from minerals particularly crystalline silica is safe.

Traffic

Most lorries must use one route along which is broadly along residential roads resulting in traffic delays, dust and particulates from emissions, long term to residents in the area.

Loss of Amenities

The communities of Smallford and Ellenbrook have significant restrictions on areas for exercise and relaxation due to surrounding built environment and restrictions on access and activities in other areas surround their communities.

The development of proposed quarry would result in very significant reduction in the limited remaining facilities.

As mineral working has taken place within the area since 1930s and not always with the highest standard of reinstatement, long term cumulative impact is imposed on residents.