

COLNEY HEATH GROUP

Third Party Statement of Case Against Proposed Quarry Development in the Green Belt

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

1. Introduction

This statement is submitted in opposition to the proposed quarry development at land at former Hatfield Aerodrome, which falls entirely within designated Green Belt land. The National Planning Policy Framework (NPPF) outlines stringent policies regarding development in the Green Belt, including specific provisions for mineral workings. We contend that this proposal contravenes key NPPF principles related to Green Belt protection, visual impact, and sustainable land use, as detailed below.

2. Conflict with Green Belt Purposes (NPPF para. 143)

According to NPPF paragraph 143, Green Belt serves five purposes and the proposed quarry development would undermine these principles:

- a. **Urban Sprawl and Encroachment:** The site entrance and visible industrial activity would blur the distinction between rural and urban areas, encouraging further urban encroachment.
- b. **Preservation of Character:** The project would erode the rural character of the area, causing irreversible harm to the countryside and setting a precedent for additional development within the Green Belt.
- c. **Urban Regeneration:** This proposal does not demonstrate that alternative brownfield sites outside the Green Belt have been sufficiently considered, failing to prioritize urban regeneration.

3. Green Belt Harm and Lack of 'Very Special Circumstances' (NPPF para. 153)

The NPPF specifies that 'very special circumstances' must clearly outweigh any potential harm to the Green Belt for such developments to be justified. In this case:

The proposed quarry fails to demonstrate a need so compelling as to outweigh the substantial harm it would inflict on Green Belt openness, visual character, and environmental integrity.

Without a justification of very special circumstances, approving this project would undermine Green Belt protections and set a damaging precedent for similar proposals.

4. Inconsistency with Green Belt Assessments and Prior Studies

Arup's 2023 Green Belt Review emphasised the importance of maintaining open, undeveloped land between St Albans and Hatfield to uphold the Green Belt's integrity and character. This site lies in a sensitive area where Arup recommended safeguarding the Green Belt status.

The 2013 SKM assessment underscores the critical role of this land in maintaining separation between towns and protecting countryside from encroachment.

Developing a quarry here would disregard the conclusions of these professional assessments, eroding the visual and spatial gap between settlements.

5. Visual Impact on Openness and Rural Character (NPPF para. 155)

The openness of the Green Belt is essential to its purpose. While certain forms of mineral extraction may be permitted, they must not compromise Green Belt openness. The proposed quarry, however, would substantially disrupt openness through:

- a. **Site Entrance and Infrastructure:** The site entrance and loss of mature trees would visually encroach on the gap between St Albans and Hatfield, creating an urbanised appearance that conflicts with the Green Belt's rural character.
- b. **Bund Construction:** The proposed bunds, some as high as 4-5 meters, would create artificial mounds that are visually intrusive and incompatible with the flat surrounding landscape. These bunds are unnecessary for mineral extraction and serve only to mitigate noise and dust—issues that would not exist without the development.
- c. **Processing Plant:** At 14-16 meters, the processing plant is significantly higher than typical mineral mounds, adding to visual pollution and reducing Green Belt openness. There is no rationale provided for why the plant must be so tall, and planning conditions should enforce a reduced height to mitigate visual impact.

6. Environmental and Community Impact

- a. **Loss of Natural Habitat:** The development would destroy habitats essential for local wildlife, fragmenting ecosystems and reducing biodiversity.
- b. **Pollution:** Noise, dust, and vibration from heavy machinery and increased traffic would negatively impact the health and quality of life for nearby residents.

- c. **Traffic and Safety Concerns:** Heavy vehicle traffic would increase congestion on local roads, posing safety risks to other road users and undermining the rural experience.

7. Flawed Reinstatement Plan and Long-Term Harm

The proposed restoration timeline of 32 years raises serious concerns about feasibility and impact:

- a. **Material Balance:** The discrepancy between imported and exported materials suggests that the restoration timeline is unachievable without significant environmental impact or further prolonging the project's duration.
- b. **Increased HGV Movements:** If the timeline or material estimates are incorrect, the number of HGV movements will be higher than projected, worsening the environmental and community impacts.
- c. **Failure to Meet Restoration Plan:** If the site cannot be restored according to the HQ15 Restoration Plan, the Green Belt will suffer permanent damage, contradicting NPPF para. 155, which mandates preservation of openness.

Conclusion

In summary, this proposed quarry development contradicts the purposes and protections of the Green Belt as outlined in the NPPF. Although mineral extraction is conditionally allowed in the Green Belt, it must not harm openness or conflict with Green Belt purposes. This application does both. Furthermore:

- The project's location in a vital gap between St Albans and Hatfield contravenes the NPPF's objectives of preventing urban sprawl and protecting countryside from encroachment.
- The construction of bunds, entrance modifications, and the height of the processing plant create a stark visual intrusion incompatible with Green Belt policies.
- The extensive timescale and flawed restoration plan indicate that the proposal would have long-lasting, if not permanent, negative impacts.

We urge the planning inquiry to reject this application to protect the Green Belt and preserve the rural character, natural environment, and quality of life that residents expect. The proposal does not demonstrate very special circumstances and poses substantial, unjustified harm that would far outweigh any potential benefits.