

COLNEY HEATH GROUP

Third Party Statement of Case Planning Policy

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

1. Green Belt Protection and Inappropriate Development

The proposed quarry development represents inappropriate development within the Green Belt, as it does not uphold the necessary openness and character. According to the National Planning Policy Framework (NPPF), Green Belt development should only proceed if "very special circumstances" clearly outweigh the harm. The large-scale processing plant, stockpile areas, and long-term siting of bunds would significantly compromise the rural character and openness that Green Belt designation aims to protect. This proposal conflicts with:

- **NPPF Paragraphs 139, 140, 147, and 148**, which emphasize protecting the Green Belt from encroachment and maintaining openness.
- **Town and Country Planning Act 1990**, Section 13(b), which protects the rural character of the Green Belt and restricts inappropriate development.

As the applicant has not demonstrated "very special circumstances," this proposal does not meet Green Belt criteria and should be denied.

2. Heritage Considerations

The proposal fails to adequately consider the impact on heritage assets, particularly the Grade II listed Popefield Farmhouse and barns. The proximity of mineral workings and the long-term placement of bunds could significantly impair these historic assets. The application fails to note or consider the Grade II listed milepost on A1057 therefore its protection has not been considered. Both the NPPF and Hertfordshire Minerals Policy emphasise that developments must protect heritage assets and their surroundings. This proposal conflicts with:

- **NPPF Paragraphs 194, 195, and 199**, which emphasize the protection of heritage assets.
- **Hertfordshire Minerals Local Plan 2002-2016** Policy 18(ii), which requires appropriate measures to protect historical and cultural resources.
- **Planning (Listed Buildings and Conservation Areas) Act 1990**, Section 66(1), which requires that special regard be given to preserving listed buildings and their settings.
- **Hatfield Aerodrome SPG** section 9.28, which requires the safeguarding the setting of listed buildings.

3. Residential Amenity

The proposal does not provide adequate buffer distances or landscaping to protect the residential amenities of nearby residents, such as those of Popefield Farm. Proximity to mineral operations would expose residents to excessive noise, dust, and visual intrusion, thereby infringing upon their quality of life. This proposal contravenes:

- **Minerals Policy 18(vii)** of the Hertfordshire Minerals Local Plan.
- **NPPF Paragraph 130(f)**, which mandates developments to provide a high standard of amenity for existing and future users.
- **Control of Pollution Act 1974**, Sections 60 and 61, which provide mechanisms to limit noise and dust impacts on local communities.

4. Landscape Character and Visual Amenity

The proposed quarry would significantly harm the landscape character and visual amenity of the area due to its scale, the long-term placement of bunds, and the removal of roadside vegetation along the A1057 for visibility splays. The cumulative impact of these elements would create an industrialised environment that is inconsistent with the Green Belt's natural character. The proposal is contrary to:

- **NPPF Paragraphs 175 and 211(f)**, which call for minimising harm to the natural environment.
- **Minerals Policy 18(vii)** of the Hertfordshire Minerals Local Plan, which emphasises respect for landscape character.
- **Countryside and Rights of Way Act 2000**, Section 85, which requires consideration of conserving natural beauty and landscape character in designated areas.

5. Biodiversity Impact

The development fails to adequately address the impact on biodiversity, including habitats and species that may be adversely affected. The proposal lacks sufficient measures to minimise environmental harm or provide for a net gain in biodiversity. This is inconsistent with:

- **NPPF Paragraphs 174(d) and 180(a)**, which mandate minimising impacts on biodiversity and achieving net gains where possible.
- **Wildlife and Countryside Act 1981**, Section 28G, which requires public bodies to further conservation and enhancement of sites designated for biodiversity.
- **Policy 9** of the Hertfordshire Minerals Local Plan, which emphasises the protection of biodiversity in mineral operations.
- **Hatfield Aerodrome SPG** which emphasises the protection of biodiversity.

6. Public Access

The proposed Public Access Strategy for Ellenbrook Fields does not adequately protect public access and enjoyment of the area throughout the duration of mineral extraction. Restricted access and increased vehicle movements would limit recreational opportunities in Ellenbrook Fields. This proposal contravenes:

- **NPPF Paragraph 145**, which encourages maintenance and improvement of public access in the Green Belt.
- **Minerals Policy 18(x)** of the Hertfordshire Minerals Local Plan, which mandates the preservation or enhancement of public access.
- **Countryside and Rights of Way Act 2000**, which protects public rights to access designated open spaces.

- **Hatfield Aerodrome SPG** which protects access, design, duration and visual impacts particularly of the processing area.

7. Traffic and Cumulative Impact on the Highway Network

The development would generate significant additional HGV movements, impacting the character and safety of the local road network, particularly along the A1057. This additional traffic requires significant mitigation to protect vulnerable road users, including cyclists and pedestrians. The proposal is inconsistent with:

- **Hertfordshire Local Transport Plan 4**, Policy 5(d)(f)(g), which manages traffic impacts to protect road users.
- **Policy 16** of the Hertfordshire Minerals Local Plan.
- **NPPF Paragraph 111**, which states that development should be prevented on highways grounds if there would be an unacceptable impact on highway safety.
- **Highways Act 1980**, which provides mechanisms to ensure road safety, particularly Sections related to the management of traffic flow and safety on public roads.

8. Groundwater and Hydrogeological Concerns

The proposal fails to demonstrate that mineral workings will not adversely affect groundwater flow or pose risks to water quality, especially given the risks associated with disturbing the bromate plume. Effective management and mitigation of groundwater risks are essential to prevent contamination. The proposal conflicts with:

- **NPPF Paragraph 174(e)**, which aims to protect groundwater resources and prevent pollution.
- **Minerals Policy 17(iv)** of the Hertfordshire Minerals Local Plan, which requires stringent protection measures for groundwater.
- **Water Resources Act 1991**, Section 85, which makes it an offense to knowingly cause or permit pollution to controlled waters.

Conclusion

The proposed quarry development would inflict substantial, irreversible harm to the Green Belt, local heritage, biodiversity, landscape character, public access, residential amenity, traffic safety, and groundwater resources. The applicant has failed to demonstrate “very special circumstances” to justify the extent of harm caused by the development, resulting in multiple breaches of key planning and environmental policies, as outlined above.

Given these extensive policy conflicts and adverse impacts, we respectfully urge that this application be rejected to protect the unique environmental, historical, and community assets of this area for future generations.