

COLNEY HEATH GROUP

Third Party Statement of Case Against Proposed Quarry

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

Restoration of the Site

- 1 My name is Mike Rawlins, I am a qualified horticulturist specialising in Hardy Nursery Stock Production and Garden Centre Management. I was appointed general manager in 1972 and have remained in a senior position throughout my working life including regional representative council member of the Horticultural Trades Association. In support of my employer's sales and marketing activities I was also responsible for undertaking a range of gardening and landscape, consultation and design activities, for clients ranged from multinational companies, UK companies to domestic gardens. Some of the referrals were via the local LPA.
- 2 Since 2015 I have been involved with Colney Heath Parish Council as Neighbourhood Plan Project Officer (voluntary) in preparing a Neighbourhood Plan and supporting the council in wide range of planning related issues. One of tasks included the formal assessment of all undeveloped land within the parish.
- 3 It is broadly agreed by all parties that maximising the area of Ellenbrook Country Park available to users is a fundamental priority, however in my opinion this cannot be achieved under the current proposals. The problems are in four core areas:
 - Shortfall in volumes of landfill imported
 - Soil type and conditions including drainage
 - Selected plant species
 - Time scale impacts

Short full in volumes of landfill imported

- 4 The restoration plan indicates two areas, open water in areas of the former lagoons and several areas of marginal wet land. Other than these areas the restoration plan indicates the soil level will be broadly reinstated to existing levels. Given the restriction on top and subsoil being removed from site. Together with the Environment Agency restrictions on types of soil that can be used for infill, one could expect that exported material and imported material would broadly similar in weight as both groups of materials fairly similar in weight per cubic metre ref. CHPC Footpath assessment (DC x.xx).

The ES Transport 7 (CD x.xx) provides us with the estimated number of vehicles bringing in landfill to the site. The total vehicle movements are stated and are the basis of all consultations and is limited in draft conditions. Any variation from this would mean that the consultations are invalid together with any responses received as they based on incorrect information.

Based on information provided the shortfall is c3,000,000 tonnes this could reduce to c2,250,000 tonnes if imported landfill continues into and throughout the restoration stage but this would impact on the completion of the site restoration.

- 5 This has a number of possible outcomes-
- a) The reinstatement cannot be completed, this would be contrary to Hertfordshire Mineral Plan policy 13 (CD 3.01) and Hatfield aerodrome SPG (CD 3.03) and the proposed planning conditions.
 - b) The reinstatement takes considerably longer than stated, this would beyond that consulted on therefore raises concerns on status of consultation, access to the Country Park and the proposed planning conditions.
 - c) An increase in vehicle movements HGV, this would be above those consulted on as outlined above.

Soil type and conditions including drainage

- 6 The selection of the plant species by the landscape team has shown a lack of understanding of the onsite soil types and conditions, see below. This has several implications, the availability of area of the park post restoration, the speed of restoration and the future growth rates of landscape plantings which will impact of effectiveness of the mitigation and longer-term visual impacts.
- 7 Most of the documents which consider soil types agree that there is a clay element in top and subsoils and the over and inter burden also contain some clay. During my repeated wintertime site visits I have seen localised flooding and plants suffering from waterlogging including subsequent plant death. This in my view will have a number of implications including suitable species, planting times, rates of establishment and future grow rates.
- 8 The need to use clay buttress around active quarrying area is understood to manage any possible bromate contamination, but its impacts on the areas beyond the working areas are less clearly considered. The diverting the Nast will also have an impact on the surface drainage of the area. During the early stages the area of the park available to users will be on the slightly higher ground to west of the workings so the clay buttresses will block the natural surface water drainage flow.

- 9 The impact is likely to result in earlier winter water logging of assessable areas, the waterlogging remaining later into the year due to reduced flow rates. This is clearly weather dependant and is likely to differ from year to year, but weather trend is towards wetter winters.
- 10 Following quarrying the reinstated area also will be within the clay buttresses so will also suffer from winter waterlogging in a similar manner, this is evidenced in the landscape assessment by the use of pioneer plant species.
- 11 The proposed site wide surface drainage system is not until the final restoration stage so it is highly likely that in some winters some areas of the park will be unusable to users of the park and some of the proposed mitigation plantings will fail.

Plant species

- 12 The final restoration planting species are not shown so we can only consider those species stated in the initial planting Drawing HQ 3/6 (CD2.02), of those species (spp.) two are not found locally at any significant level, *Viburnum opulus* and *Sorbus aria*. These species are likely they will fail to establish however if they do establish, they very likely perform poorly in clay heavy clay soils found in the park. These are spp. of the well-drained chalk landscape, the application site is clearly not this type of landscape.
- 13 *Ilex aquifolium*, *Malus sylvestris* and *Corylus avellana* are found locally and do tolerate clay soils but require the soil to be well drained. The spp. will only be suitable in selected areas where the drainage is better, but areas of poor drainage are likely to perform poorly, that is if they establish following the initial planting.

Planting times

- 14 Some container grown plants may be suitable for early autumn planting however most are shown as being bareroot - Advanced works HQ 3/6 August 2021 (CD 2.02). Bareroot plants must be planted while dormant, if planted in waterlogged soils the death rate is likely to be substantial. If planted later in season death rate is also likely to be significant if its followed hot dry spring or summer which has occurred in recent years. With the likely requirement to replant failed plants the delay in reinstatement and the recovery of the landscape is likely to be significantly delayed.

Time scale impacts

- 15 Two factors are likely to delay the reinstatement of Ellenbrook Country Park, the short fall in landfill and the poor establishment of the landscape plantings and seeding.

- 16 Our calculations of imported landfill include the first year of quarrying, however this may not be possible, so the commencement of importing landfill is likely to be delayed. The importation of landfill during the restrictions on periods during which topsoil can be moved together with the period for planting and sowing would indicate that no importation of landfill will be possible during the final year. These two factors limit either the volume of sand and gravel produced therefore contrary to NPPF para 216 and Hertfordshire Minerals Plan policies 13, 14 and 15 CD(3.01) or the reinstatement is unable to be completed within the 32 year time frame.
- 17 As a horticulturist I support the need to move and process topsoil when soil conditions are appropriate. On this site it is going to be particularly important due the high clay element within the topsoil. Given the shortfall of c3,000,000 tonnes of landfill therefore the need to maximise the importation of landfill the restrictions on topsoil handling and sowing and planting seasons. The only outcome is likely that is the reinstatement will be significantly delayed.
- 18 I note the aftercare period is beyond the final restoration period which will allow for some care and limited replanting of failed trees and shrubs.
- 19 Given the substantial shortfall in landfill and onsite soil conditions in my opinion it is impossible that the quarry and reinstatement will be completed within 32 years. Therefore, significant areas of the Country Park will not be available to users as promised via S106 agreement. This in turn means that the basis of consultation was flawed as the timescale was impossible to achieve and the proposed planning conditions are unable to be met. This would also raise concerns on the HCC officers recommendation that the application should be approved as this to was also based on incorrect information.

Appendix 1

Royal Horticultural Society (RHS)

Hazel *Corylus avellana* ref. Woodland Trust

In spring, hazel is laden with pretty 'lamb's tail' catkins and in autumn it produces nuts popular with wildlife. This tree responds well to close pruning. Hazel is also distinguished in legend as a magical tree that provides protection.

Hazel estimated full grown height:

10 metres or more, but its height can be controlled by pruning. Hazel trees grow an estimated 40-60cm each year.

Value to wildlife:

Hazel is associated with the hazel dormouse, which eats the nuts as well as caterpillars it finds on the leaves. Hazelnuts are also eaten by woodpeckers, nuthatches, jays and native mammals such as red squirrel, wood mouse and bank vole.

Hazel preferred soil type or environmental conditions:

A shade-tolerant tree for non-acid well-drained to moist soils. Can be planted as part of a native hedgerow.

Crab apple *Malus sylvestris* ref Woodland Trust unless stated

Crab apple is a wild ancestor of the cultivated apple and its wood has long been associated with love and marriage. Its sweetly-scented, pink-white blossom appears in spring and its apples ripen in later summer to autumn. You can use crab apples to make jellies and jams..

Crab apple estimate full grown height:

7-9 metres, growing an estimated 30cm each year.

Value to wildlife:

The flowers are a good source of early pollen and nectar for insects, particularly bees. Birds like the fieldfare, song thrush, blackbird and redwing enjoy the fruits. Mammals, like mice, voles and badgers, are also partial to the fruit as well.

Crab apple preferred soil type or environmental conditions:

Prefers sun or semi-shade, will tolerate most soil types and dryness.

Moisture Moist but well-drained pH Acid, Alkaline, Neutral - RHS

Please note that you may require tree protection if your saplings will be at risk of damage from mammals such as rabbits or deer.

Common whitebeam *Sorbus aria* ref. Woodland Trust

Charming and domestic, the whitebeam's fruit is a favourite of garden birds. It's rarely found in the wild but is a popular ornamental tree in parks and gardens, with lovely blossom and russet autumn leaves.

Whitebeam is native to Britain being more prevalent in the south of England on chalk and limestone. Hillier Manual of Trees and Shrubs

Soil Moist but well-drained, pH Acid, Alkaline, Neutral RHS.

Holly *Ilex aquifolium*

Soil prefers moist, well-drained soil that's rich in organic matter. It can grow in most soil types, but it doesn't like solid chalk. RHS

Guelder rose *Viburnum opulus* Woodland Trust

Is a spreading, deciduous, upright shrub. It can reach up to 4m high and can spread from 2–5m. It has greyish, hairless stems.

Soil moist but well-drained, pH Acid, Alkaline, Neutral RHS