

# **HATFIELD AERODROME**

## **Town and Country Planning Act 1990, Section 78**

Application for the establishment of a new quarry on land at the former Hatfield Aerodrome, including a new access onto the A1057, aggregate processing plant, concrete batching plant and other ancillary facilities, together with the importation of inert fill materials for the restoration of the minerals working

**Application Ref. 5/0394-16**

Section 78 Appeal against refusal of planning permission by Hertfordshire County Council.

**Appeal Ref. APP/M1900/W/21/3278097**

**Proof of Evidence of Simon Treacy MRICS MIQ BSc**

**Subject - The Applicants Site**

**Document – BAL3/1**

Brett Aggregates Limited  
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Kent  
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October 2021

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## **1.0 QUALIFICATIONS**

- 1.1 I am Simon Richard Treacy. I am employed as Planning Director of Robert Brett and Sons Limited, the parent company to the appellant, Brett Aggregates Limited, in this case.
- 1.2 I am a Chartered Minerals Surveyor with over 20 years post qualification experience in the quarrying industry. I hold a BSc in Surveying for Resource Development and an HND in Minerals Surveying. I have been involved in the development of minerals resources throughout the UK for over 25 years and prior to joining Robert Brett and Sons in 2018 I held a number of senior positions within Tarmac Limited. In this time, I have also worked for a firm of Chartered Surveyors in London at associate partner level providing a professional service representing the interests of minerals production companies, planning authorities and landowners.
- 1.3 I have extensive experience of quarrying and its associated industry that has been developed through my numerous positions within the industry. This experience has encompassed various rock types, aggregates, wharves, rail heads together with recycling and inert landfilling and the phased restoration of sites. Geographically this experience extends to cover mineral planning developments within sensitive locations such as National Parks including the Yorkshire Dales, the Peak District, the Lake District, and the South Down's in addition to Greater London, the Home Counties, the wider SE and Anglia areas.
- 1.4 I am a longstanding member of the Institute of Quarrying in addition to my professional membership of the Royal Institution of Chartered Surveyors. I also chair a team of directors that manage the Minerals Products Association 'Restoration Guarantee Fund'. This is a minerals industry pledge whereby should a member operating company fail to deliver on its restoration obligations, a planning authority can apply to the fund for financial assistance to complete a scheme.
- 1.5 My current role incorporates the management of the Robert Brett and Sons development requirements, managing a team of qualified planners to deliver the planning and property needs of the business.
- 1.6 I have a detailed knowledge of the Robert Brett and Sons' businesses including its quarry sites and other operational activities.
- 1.7 I confirm that the opinions I have expressed in this proof of evidence represent my true and complete professional opinions on the matters to which they refer and complies with the Royal Institution of Chartered Surveyors Practice Statement: 'Surveyors acting as Expert Witnesses'.

## **2.0 PURPOSE OF MY EVIDENCE AND SUMMARY**

- 2.1 My evidence provides a background to the appellant company, it describes the approach the appellant takes towards regulatory compliance through its integrated environmental management systems and restoration awards received over many years.
- 2.2 It also discusses the socio-economic benefits that the proposed development will bring and describes how a sand and gravel extraction development commonly occurs within the metropolitan green belt.

- 2.3 Whilst Chris Lowden will reference a planning related discussion on need in relation to the appeal site, national policy and the development plan, and that these have also been referenced in our Statement of Case and the planning application, my evidence will concentrate on requirements from an industry perspective.
- 2.4 In summary I state that the appellant is a long-standing firm with a good track record in delivering restored sand and gravel developments. I also describe that the appellant manages an accredited environmental management system that is subject to both internal and external auditing.
- 2.5 I have reviewed current demand for aggregates in the locality and referenced published data in this respect by the Minerals Products Association. I have highlighted how the appeal site can contribute towards a high local demand for aggregates and also as void space for inert backfill.
- 2.6 I have reviewed sand and gravel developments within the metropolitan green belt, demonstrating that these are numerous. I have highlighted that allowing sand and gravel extraction from within the green belt is essential to not only Hertfordshire but the wider Greater London and home counties area to ensure that a sufficient supply of minerals to meet local needs is made. For Hertfordshire I consider that there is very little alternative to sand and gravel extraction occurring within the green belt.
- 2.7 Finally, I have described the socio economic benefits that the scheme would bring.

### **3.0 BRETT AGGREGATES LIMITED**

- 3.1 The Brett group is proud to be an independent business for over 110 years and is the UK's largest independent building materials group. The company comprises 5 key operating businesses:
- a. Brett Aggregates Limited
  - b. Brett Concrete Limited
  - c. Brett Landscaping and Building products Limited
  - d. Granite Products Limited (in Jersey).
  - e. Britannia Aggregates Limited
- 3.2 The company operates from more than 50 sites employing over 700 people. The company manufactures paving products for use in town centres and house building projects, and safety kerbs for traffic containment. A high percentage of paving is produced for SUDS (Sustainable Urban Drainage Systems) related work. Up to 1,000,000 cubic metres of ready-mix concrete is produced every year by Brett for infrastructure, commercial and house building projects, whilst the company typically produces nearly 5,000,000 tonnes of primary and recycled aggregates each year for homes, roads, shopping centres, schools and hospitals.
- 3.3 Approximately 2,000,000 tonnes of this supply is dredged each year from the English Channel, the North Sea and Thames Estuary supplying a network of aggregates wharves in London, the South-east and Anglia. In order to supply its customer base, Brett has access to a network of depots enabling its products to be transported by road, rail, sea and river.
- 3.4 The company has won almost 50 awards for quarry restoration projects. In 1970 Brett won its first restoration award at Willow Close near Canterbury in Kent. Since then, the Company has gone on to win a further 48 awards from local council and industry bodies

including the prestigious 'Cooper Heyman' trophy six times. In 2009, at the one off 40th anniversary trophy for the best Cooper Heyman trophy winner since the scheme began, Brett was presented with the award for its 'Laleham Farm' site in Middlesex. This former sand and gravel quarry in the green belt at Staines in Middlesex was chosen because of its restoration to 'Immaculate farmland' involving the backfilling of the quarry void with imported inert materials and handling and replacement of topsoils across the site.

- 3.5 In connection with the appeal site and proposed restoration scheme, it should be noted that Brett, amongst the awards referred to above, has been specifically recognised for restoration schemes with similar themes completed at the following locations:

- a. Country Park – 'Conningbrook' at Ashford in Kent.

The site contains three profiled lakes, all the result of sand and gravel working. Public access routes have been provided for walkers and cyclists whilst the restoration works deliver enhanced nature conservation habitats to the existing riverside setting. The location offers sporting and recreation use across the site including 'The Julie Rose Athletics Stadium' and won the MPA's 'Chairman's Trophy' in 2006.

- b. Public access – 'Church Lammas', Staines, Surrey. (Mineral Products Association - Cooper-Heyman Cup winner 2005).

Following restoration of this site, Church Lammas was chosen as a demonstration site for 'ground-breaking access for all', including people with physical and mental disabilities, looking to enjoy the biodiversity and nature conservation habitats at this location.

The restored site in the green belt contains designated wheelchair accessible footpaths and interpretation boards, with a specially designed braille panel. The site also boasts a bespoke bird-hide shelter, a boardwalk installed around a small shallow bay to give a heightened experience of contact with water, whilst maintaining safe routes for disabled visitors.

Bird and bat boxes have been installed around the site and sensory planting areas set aside for use by local interest groups to provide a range of sensory experiences.

- c. Nature conservation – 'Lydd Quarry', Kent

A unique landscape through gravel extraction has been created as has been recognised by Natural England. Restoration works have been undertaken in a sensitive environment within nationally and internationally recognised designations where a series of wetland habitats had been formed. Brett's restored areas were themselves designated as a Ramsar site to acknowledge the importance of the restored areas in attracting flora and fauna.

#### **4.0 BRETT NEED FOR A LOCAL AGGREGATES SUPPLY**

- 4.1 Chris Lowden will, in his evidence address need from a planning policy perspective, in this section I consider the Brett related commercial strategy for the appeal site including other published information concerning current trends for aggregates demand. I also consider mineral developments in how these are typically designed in the context of the metropolitan green belt.

## **Brett Commercial strategy**

- 4.2 The Hatfield location is recognised by Brett as being very well placed to supply the local market with aggregates alongside other market areas to the north and northwest of London. The site is also very well located for receiving and placing inert waste arisings. Brett is seeking to establish an aggregates development that would supply 250,000 tonnes per annum into an established and local construction and building industry. This would comprise circa 150,000 tonnes per annum for the off-site production of ready mixed concrete, 50,000 tonnes per annum into builders' merchants and aggregate bagging and 50,000 tonnes to local contracts. The inert fill for the restoration activities will come from the north London and other local markets and will be brought in as soon as sufficient void has been created and engineered by the excavation operations.
- 4.3 The Hertfordshire Local Aggregates Assessment 2020 (covering the calendar year of 2019) reports annual Sand and Gravel sales of approximately 1.25 million tonnes, of which 60-70% is sourced from within Hertfordshire, 10-20% from Essex and 1-10% from other counties i.e., Cambridgeshire, Bucks. Notably 30% to 40% is imported to help meet demand.
- 4.4 There is also significant population growth forecast in Hertfordshire which is expected to grow from 1.17 million in 2014 to 1.37 million by 2039. This is reflected in County and District housing plans, with significant housing growth proposed across southern Hertfordshire. Approximately 4,200 houses were constructed in Hertfordshire in 2019 and assuming a typical primary aggregates requirement of 166 tonnes per house (MPA study August 2018 – 'How much aggregate do we use to build a house') including services, means an annual requirement of just under 700,000 tonnes was required to service this requirement alone. Should Crossrail 2 proceed then it is due to terminate at Broxbourne, just 12 miles east of the appeal site, whilst other significant infrastructure projects include HS2, A120 Bypass at Little Hadham, A602 Improvements (Stevenage to Ware).
- 4.5 Significant growth is expected across southern Hertfordshire, and the appeal site is well located to supply this growth, distances to key markets being:

| <b>Town</b>        | <b>Distance Miles (by road)</b> |
|--------------------|---------------------------------|
| Hatfield           | 2                               |
| St Albans          | 5                               |
| Borehamwood        | 9                               |
| Hertford           | 10                              |
| Hemel Hempstead    | 11                              |
| Welwyn Garden City | 12                              |
| Watford            | 14                              |
| Barnet             | 16                              |

- 4.6 There is insufficient supply from local quarries to meet market demand, as evidenced by the significant imports of mineral into the area. The future long term aggregate market for the Hatfield area will continue to be primarily based on use of sand and gravel from local quarries supported with imports from adjacent Essex, Cambridgeshire and Bedfordshire sites.

- 4.7 The market in and around Hatfield is supplied by land-based Sand and Gravel from a number of large quarries, the largest current operations being Tarmac at Tyttenhanger and Cemex at Hatfield. Two quarries have recently closed - Panshanger and Ware quarries following completion of mineral extraction at those sites. Tyttenhanger has approximately eleven years of reserves remaining, and Cemex has approximately ten years left at Hatfield Quarry. Limited quantities of crushed rock are imported into the market area by rail but there is very limited scope to increase this due to the lack of suitable rail sidings in the county.
- 4.8 Brett's proposed quarry at the former Hatfield Aerodrome will assist in replacing supplies following the closures of Panshanger and Ware quarries but will also replace minerals currently imported by road from outside the area. It will also assist in replacing part of an existing short life quarry that Brett operates at Wexham in Buckinghamshire that is due to close in the next two years.
- 4.9 In terms of ready mixed concrete production, Brett will look to serve its ready mixed concrete plant outlets in north London in addition to third party (non-Brett outlets) and will invest in establishing an additional new ready mixed concrete plant operation in Watford. Other outlets (non-ready mixed concrete) will comprise aggregate bagging companies that serve the DIY chain stores alongside requirements around housing (e.g., pipe bedding associated with provision of services, SUDS and highways schemes), major infrastructure schemes and local smaller contracts.
- 4.10 Brett's proposed sales of aggregates from the appeal site would in general terms supply the housing market (new build, extensions, DIY etc), at about 40% of sales, infrastructure at about 22%, industrial and commercial at 21% with the remainder, 17% supplying 'other' sales. Given the level of imports into the county alone, Brett has absolute confidence that the market has demand for a local source of aggregates from the appeal site to supply in the order of 400,000 tonnes of aggregates per annum. However, the permission being sought would produce an output of circa 250,000 tonnes per annum..
- 4.11 The appeal site is well connected to Central London via the A1 and , due to the shortage of quarry void within the M25, is a good location for receiving inert materials for infill and the restoration of quarry workings. Much of the construction spoil from north and northwest London is taken to restore quarries in Hertfordshire and with capacity diminishing at existing sites there is a significant demand for future void space.
- 4.12 There is an established market to serve from the proposed location and given the growth that is expected within the market area, can only reinforce the need for and establishment of a source of aggregates supply in addition to a quarry void for inert backfill at this location.
- 4.13 If the proposed development does not proceed then higher quantities of aggregates will have to be delivered into Hertfordshire by road, with additional HGV road miles, traffic and emissions as a result. This assumes that those supplies are readily available, transportable and viable to trade. In addition, spoil from the local market and London will have to travel further for disposal, generating additional traffic and emissions and again the same assumption above, on void availability, would apply. The proposed development enables local demand to be met locally and demand in North London to be met with as few road miles as reasonably possible.

4.14 Given the previous planning approval decision at committee, Brett has commenced the process of securing board approval to invest an initial £10m into the development of this location . Assuming a favourable decision, this investment would establish the site infrastructure needed before the quarry development could be commissioned. This would take circa 1 to 2 years to complete and would include:

- planning and environmental permitting costs (environmental permit for landfill has already been secured)
- power supply, aggregates processing plant and associated lagoons
- highways access, weighbridge, offices and wheel cleaning
- internal site roads, infrastructure, fencing and security
- ecology habitat creation and translocation,
- archaeology,
- soil stripping and placement.

#### **Mineral Products Association (MPA)**

4.15 MPA is the industry trade association for the aggregates, asphalt, cement, concrete, dimension stone, lime, mortar and silica sand industries. Since its formation in 2009, MPA has grown and now represents the vast majority of UK mineral products operating companies across its 14 product groups. These include most of the independent SME quarrying companies throughout the UK, as well as a number of major international and global companies. MPA covers 100% of UK cement and lime production, 90% of GB aggregates production, 95% of asphalt and over 70% of ready-mixed concrete and precast concrete production.

4.16 The MPA highlights that in 2018, the industry supplied £16 billion worth of materials and services to the economy and was the largest supplier to the construction industry, which itself had an annual output valued at £172 billion. MPA also highlights that industry production represents the largest materials flow in the UK economy and is also one of the largest manufacturing sectors.

4.17 The MPA releases on a quarterly basis the latest production figures for the industry and has also produced a UK Minerals Strategy (2019). These are particularly useful documents for understanding the most up to date current demand for mineral products and for long-term forecasting. In addition to carrying out its own research, Brett uses this market intelligence when making business decisions on its investments, budgeting and strategies.

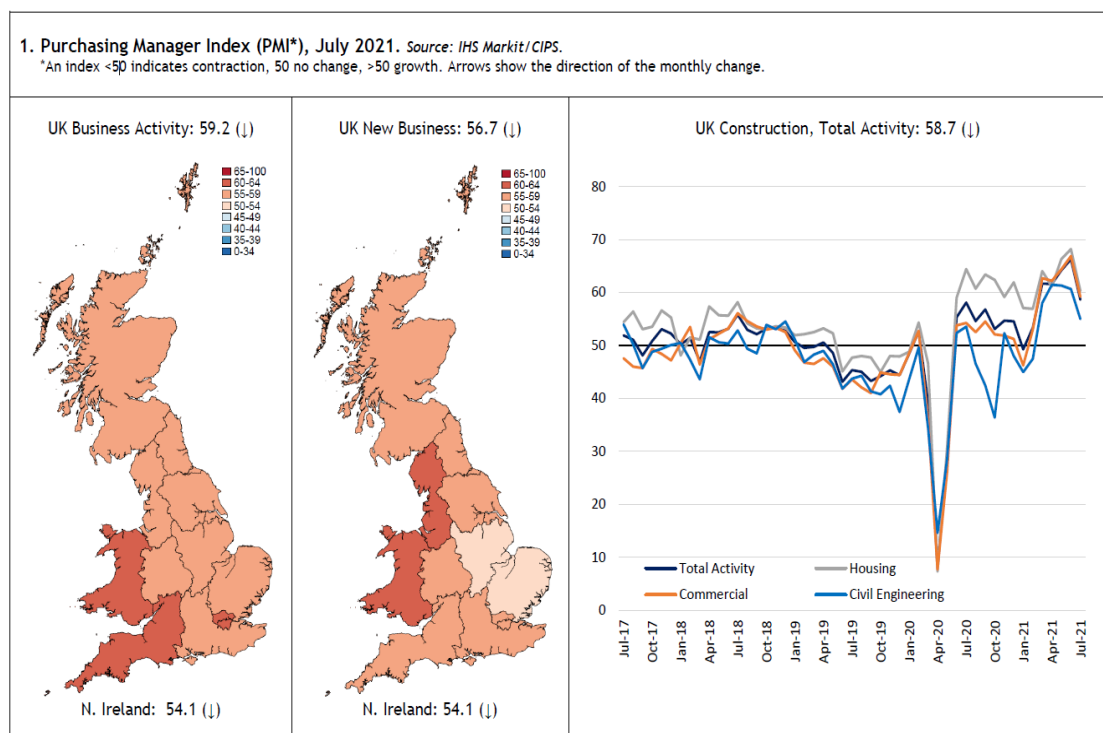
4.18 In terms of aggregates demand, data is collated by the MPA across the three main sources – ‘primary aggregates’ these are extracted through quarrying or mining on land or marine dredging from the seabed, ‘recycled aggregates’ that are sourced from the reprocessing of construction and demolition waste, and ‘secondary aggregates’ that are made from using the by-products of other industries. Recycled and secondary aggregates account for almost a third of the total construction aggregates used in Britain.

#### **MPA Economic & Market Briefing 26 August 2021**

4.19 The latest statistics are useful to highlight the demand for products at the current time. The most recent statement produced by the MPA is dated 26 August 2021. This is appended as ‘SRT/01’ and describes the level of activity for the summer of 2021 but also makes a comparison with the rolling previous 12 months data and also forecasts demand for the subsequent 12-month period.



- 4.20 The August statement highlights that “the industry has been supplying record volumes of materials such as aggregates and asphalt in the first half of the year”. It also states that “the MPA market forecast published in May-21 suggested growth in aggregates sales this year by 11% compared to 2020, 9% for asphalt, 10% for ready-mixed concrete and 15% for mortar. The stronger than expected outturn for 2021 Q2 and continued strength in demand over the summer both suggest that sales are increasing ahead of our 2021 forecast”. Moreover “industry forecasts indicate further growth in output over 2021 H2 and next year, with the pipeline of new contract awards remaining at above-average levels and industry optimism strong.”
- 4.21 The report goes on to say that “for aggregates, although sales recorded a small quarterly rate of decline of 0.4% in 2021 Q2, volumes were at historical highs, boosted by demand for fill materials on major infrastructure projects and highway schemes”. The report then states that “Further growth in construction output is expected over the second half of this year and into next year. In their latest update published in July, the CPA forecasts construction output to rise by 13.7% in 2021 (a small upward revision on their previous forecast) and by 6.3% in 2022”.
- 4.22 In terms of the pandemic, this did result in a significant drop in demand as most construction and building activities came to a temporary stop. However, the graph below (taken from the August MPA statement) shows that this fall was very short lived, with activity fully recovered and exceeding pre-pandemic levels.



- 4.23 Whilst the MPA figures describe a national picture, from Brett’s perspective in terms of activity closer to London, its own experience shows that the MPA position is reflected in this area with demand at least either matching or outstripping the national forecast. In relation to the appeal site, Brett has an existing operational position in Greater London and most of the ‘home counties’ (Essex, Bucks, Kent and Surrey). The MPA August report demonstrates that the current demand for aggregates is very healthy and with a positive outlook going forward.

## **UK Minerals Strategy**

- 4.24 In July 2018 the MPA published its 'UK Minerals Strategy', a focus on non-energy minerals (Appendix SRT/02). The purpose of the document was to 'help national and local Government and key stakeholders understand not just the scale and importance of the industry to the UK, but how best to ensure that future demand can be supplied sustainably and support growth in the economy' and to provide 'a common platform and context to inform future policy development'. Usefully the document forecasts demand for the next 25 years. The strategy has been publicized and widely circulated amongst national and local government. It was acknowledged by Government as 'helping to achieve a productive, innovative, sustainable and successful minerals sector'.
- 4.25 The report highlights that 'the continued extraction of minerals is essential to the UK for our economy and quality of life. Minerals provide the main constituents for most construction materials, such as asphalt, cement, concrete, bricks, mortar, glass, plaster, ceramics, and for uses as diverse as chemicals manufacture, pharmaceutical products, agriculture, and the production of paper and steel. While the largest tonnages extracted and supplied are construction and industrial materials, the manufacturing industry as a whole requires a greater range of minerals than ever before'.
- 4.26 The report then states that 'Based on recent consumption, the industry estimates that in excess of 5 billion tonnes of primary minerals, predominantly aggregates, will be required over the next 25 years, the majority of which will be from primary indigenous sources.' Importantly, in terms of sourcing, the report highlights that 'while recycled and secondary materials now provide around 30% of aggregates supply, reducing some requirements for primary materials, this source is virtually maximised and primaries will form the vast majority of future supply'.
- 4.27 Despite the importance that construction aggregates play in contributing towards local and national economies, the report states that 'permitted reserves, particularly of construction aggregates, are not being replenished quickly enough and some major extraction permissions, providing large amounts of material across the country, will be coming to an end in the near future or, in the case of some old permissions, 2042. Some local shortages in minerals supply are already evident, such as certain qualities of sand, and are likely to increase.'
- 4.28 Underpinning the UK Minerals Strategy, the MPA produced in 2016 its report entitled 'Long term aggregates demand supply scenarios'. This report (Appendix SRT/03) provided a forecast for minerals demand for the period to 2030. Using projections for general construction activity, population growth and the UK economy, demand forecasts have been made. The key findings of this report describe that by 2030 267 mt per annum of aggregates being needed to respond to construction needs and the industry faces a cumulative demand for aggregates of between 3.2 and 3.8 billion tonnes over the next 15 years. A concern is expressed about a decline in permitted reserves of sand and gravel in that planning permissions are not keeping up with the pace of annual sales (replenishment rate) and if this continues, shortages of supply may become apparent. The MPA projections show an increasing requirement for aggregates demand each year over the period to 2030 with a rising demand as the next decade is entered.

- 4.29 In my opinion there is a strong need for the appeal site to be granted permission in order that it may contribute towards local minerals supply requirements. Whilst the MPA projections referred to above generally describe a national picture, these, in addition to the company's own research, local growth projections etc. do give Brett confidence that, should permission be granted for a sand and gravel development at the appeal site, given the projected demand for aggregates, pressures on supply chains to replenish sand and gravel consumption, there is very little doubt concerning the appeal sites ability to contribute towards demand over the proposed development timeframe.

#### **Quarry design in the metropolitan green belt**

- 4.30 In order to give access to and expose a sand and gravel mineral deposit the overlying topsoil, subsoil and overburden material needs to be stripped and relocated. In my experience all sand and gravel deposits have this order of stratigraphy – a sand and gravel deposit does not outcrop at the surface, for example, without being overlain by these materials. Best practice (and policy) is to preserve these materials on site temporarily for future use in restoration. Thus, there is a need to temporarily store them.
- 4.31 To screen the mineral workings, best practice is to locate soil stores on site to assist in hiding the mineral development from sensitive views. These 'bunds' are then 'profiled' to reduce the visual impact of them, seeded to grass or vegetated in some other way until they are required for restoration purposes. These bunds also have an additional benefit in providing noise attenuation, by being placed between sensitive noise receptors and the development, reducing any noise impact by absorbing and reducing noise. Thus, established and best practice is to retain soils and overburden on site for:
1. Use in the restoration of the site.
  2. As visual screening bunds to screen operations from external views to minimise visual intrusion.
  3. Used for noise attenuation purposes.
- 4.32 In my experience, it would be almost impossible to work a sand and gravel mineral deposit without stripping and storing the soil and overburden resource on site. This approach is the most sustainable way of managing this resource and has other benefits as described above. It is not accepted practice to remove, transport and store elsewhere the soil resource and overburden for later relocation back to the mineral site for use in the restoration of the working site. To do so would generate additional impacts in terms of noise, visual intrusion, economics, transport, carbon emissions and air quality in addition to reducing the scope for on-site mitigation in terms of noise, visual screening and potentially impacting on the subsequent restoration of the site. As far as I am aware, in relation to the appeal site, there are no non green belt areas in the vicinity of the site available for storage of such materials if this was to be considered as an option in some way.
- 4.33 All sand and gravel quarries require a processing plant to wash and grade the mineral arising – to separate sand and gravels according to size and quality requirements as set by British Standards for aggregates. Without processing, the extracted mineral would not meet these requirements and would be very limited in use e.g., 'bulk fill', an application more sustainability suited for recycled aggregates. To my knowledge and experience of the industry across London, home counties and beyond, all sand and gravel quarry sites in the metropolitan green belt (either currently operating, proposed or recently restored) include the following features:

1. Profiled bunds comprising soils and overburden stripped from the development site
  2. Processing plant for washing and sizing the extracted mineral
  3. Silt settlement and freshwater lagoons associated with processing.
  4. Site offices including weighbridge and weighbridge office.
- 4.34 In my view the government's acceptance that mineral extraction in the green belt as being 'not inappropriate', must extend to the ancillary features and operations necessary to extract such mineral, namely the operations listed above. It is then a question of design as to how such features are located and incorporated to minimise impact.

#### **Sand and gravel extraction within the metropolitan green belt**

- 4.35 It is worth highlighting that all current and recently completed sand and gravel mineral extraction operations within Hertfordshire, including those allocated within the current and adopted minerals plan and those proposed to be allocated within the emerging Minerals Plan, are located within the green belt. I have mapped these locations on the accompanying plan (ref SRT/04) along with the location of the designation. Much of the county comprises either built up urban areas or countryside that falls within the designation. No sites are shown in non-green belt locations.
- 4.36 Part of the county centering around Buntingford contains countryside that is not located within the green belt designation. Having reviewed the British Geological Survey drift maps, much of this area comprises 'glacial till' and chalk, which explains why there is no known sand and gravel resources in this area. This informs me that the county's contribution towards sand and gravel minerals supply is entirely dependent upon locations within the green belt.
- 4.37 Having researched all sand and gravel quarries currently operated within the metropolitan green belt, I note that all of these operations contain the features listed above. I attach plan reference SRT/05 which shows the location and number of existing and recently completed sand and gravel operations that are located within the metropolitan green belt. This confirms that mineral extraction from within the green belt is not only commonplace, but it is essential to ensure that there is a sufficient supply of minerals to contribute towards local needs. For Hertfordshire I consider that there are no alternatives to sand and gravel extraction occurring within the green belt noting the extent of the designation within the county.
- 4.38 I note in this respect the conclusions of the ES and also Chris Lowden's evidence in terms of green belt matters.

#### **Socio economic benefits**

- 4.39 When determining planning applications 'great weight' should be given to the benefits of mineral extraction, including to the economy. This is a truism that is repeated in the NPPF and draws from the maxim, also within the NPPF, that it is essential that a sufficient supply of minerals is provided for infrastructure, buildings, energy and goods that the country needs.
- 4.40 The planning application described the benefits that would derive from the development. In terms of local employment, the quarry would have a core staff of 6 employees. This would comprise a manager, a foreman, 2 loading shovel operatives, 1 dozer operative and 1 weighbridge operative. The number of staff would increase to 10

during mineral extraction operations which will be undertaken on a campaign basis and over temporary periods each year.

- 4.41 Allied to this the quarry would generate a number of indirect employment opportunities associated with the haulage of aggregates/concrete and the provision of services, such as maintenance and engineering contractors, landscaping and ecology contractors. The quarry would contribute into the economy through taxes, business rates and aggregates levy contributions. The development would thus secure these employment opportunities and wider socio-economic benefits into the long term.
- 4.42 The development site is an allocation within the current Minerals Plan and also the emerging plan. Some concern has been expressed about the development locally. It is likely that some form of site allocation would remain within the development plan given the need to allocate sites to meet current and future mineral requirements. Allowing the development to occur will remove uncertainty and ultimately enable the restoration scheme and country park and its associated enhancements and biodiversity improvements to be established within the shortest possible timescale.
- 4.43 In terms of potential quarry extension areas, Brett is not aware of any lateral adjoining land that could readily represent a potential extension area to the appeal site. Unlike other mineral sites in the locality e.g., Hatfield Quarry and Tyttenhanger quarries, that have evolved over time to absorb subsequent extension areas, and consequently have involved development timescales dating back to the 1960's, the appeal site is constrained by sensitivities that would prevent this from occurring. This brings a level of certainty about the extent and nature of the development in comparison to other sites in the county.

## **5.0 BRETT REGULATORY COMPLIANCE**

### **Introduction to 'QHEST'**

- 5.1 QHEST (Quality, Health, Environment, Safety, Sustainably Together) is an integrated management system aiming to combine the requirements for quality, occupational health, environment, sustainability and safety into one comprehensible set of procedures that all Brett employees can follow.
- 5.2 Brett needs to understand the statutory and non-statutory requirements relevant to our business so that it can conduct the business with integrity. The company also needs to understand the risks the business can potentially pose to the environment, to the health and safety of anyone coming into contact with the activities of the company and to the company's ability to produce and continue to produce quality products and service. Operating to the QHEST system enables the business to do this effectively.
- 5.3 The QHEST system is integrated in that it covers the regulatory regimes of 'planning control', 'environmental permitting', and 'health & safety'. It also covers other matters such as company policies. It is an online system, thus easily updateable and accessible.

- 5.4 The senior leaders of the Brett Group take accountability for the effectiveness of the QHEST Management System. This assists in ensuring that it is suitably implemented, maintained and improved in line with business needs, legislation and following any periodic system reviews. The QHEST System provides a tool for employees to understand and to follow in order to comply with the requirements for product quality, health and safety and environmental concerns. Brett employees were involved in designed the system to ensure that the procedures work in practice.
- 5.5 A suite of Brett Group Policies comprising an overarching Leadership, Sustainability and Responsible Sourcing Policy supported by specific policies which form the general statement of intent towards managing:
- Safety, Health and Environment
  - Quality
  - Ethical issues
  - Energy, Water, Waste & Resource Management
  - Transport
  - Employee Training & Competence
  - Community Liaison, Consultation & Complaints

The manual itself is divided into 5 sections;

|                                 |                                                                                                                                                                                                                      |
|---------------------------------|----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| <b>INTRODUCTION<br/>QHEST 1</b> | Contains introduction to the system and Group Policies. Business Procedures – i.e., those procedures specific to an individual Brett Business.                                                                       |
| <b>QHEST 2</b>                  | Contains Brett Group Procedures – i.e., those procedures relevant to all sites within the Group.                                                                                                                     |
| <b>QHEST 3</b>                  | Site Specific Procedures – this section is provided for individual site or department managers to add in procedures specific to the scope and operation of their site or department function or business activities. |
| <b>QHEST 4</b>                  | Guidance Notes – provide additional and supporting information for QHEST Procedures.                                                                                                                                 |

- 5.6 The system has been developed to meet the requirements of the following internationally recognised standards:
- BS EN ISO 14001:2015, Environmental management systems.
  - BS EN ISO 9001:2015, Quality management systems
  - OHSAS 18001:2007, Occupational health and safety management systems
  - QSRMC Quality and Product Conformity Regulations 2003 (EN 206-1)
  - BES 6001 Responsible Sourcing of Construction Products

### **Auditing**

- 5.7 A programme of internal audits is produced to ensure that the system is being operated correctly and to ensure that the system is effective in its implementation.

External surveillance audits by a third-party accredited body are also undertaken. This is in compliance with the internationally recognised standards listed above. It also helps to demonstrate to stakeholders the continued commitment and compliance to the management of quality, health & safety and environmental issues. and the Brett Group's commitment to continually improving its performance in these areas.

#### **Appeal site regulatory control**

- 5.8 Should the appeal be allowed, Brett's QHEST system would be extended to incorporate the development site and accommodate all consents associated with it. These would fall to be documented within QHEST 3 as described above. This would, as a minimum, extend to the site planning permission, S106 agreement and any subsequent matters approved under the planning conditions. In addition, the system would document all environmental permits issued by the Environment Agency along with a private operators agreement documented with Affinity Water. Compliance would then fall to be measured, audited and recorded in line with the relevant standards above.
- 5.9 Given the importance of regulatory control to ensure the appeal site mineral development scheme could occur in a satisfactory way, the below planning condition is proposed for inclusion:

*"The operator shall operate and maintain an accredited Environmental Management System, such as ISO 14001 or equivalent, until the restoration of the site has been completed. Verification of such accreditation shall be produced on request to the mineral planning authority."*

## **6.0 SUMMARY & CONCLUSIONS**

- 6.1 Based upon the foregoing I conclude the following:
- 6.2 The appellant is a long-standing firm with a good track record in delivering restored sand and gravel developments. I also describe that the appellant manages an accredited environmental management system that is subject to both internal and external auditing. A suggested draft planning condition is proposed committing a site operator to the appeal site operating an accredited Environmental Managements System.
- 6.3 There is a healthy market for the appeal site to serve, I have highlighted the how the appeal scheme can contribute towards local needs for aggregates and void space for inert backfill.
- 6.4 Sand and gravel extraction is commonly sourced from the metropolitan green belt. The proposed activities are not unusual in terms of sand and gravel extraction that are commonly seen across all sand and gravel developments that occur in the metropolitan green belt.
- 6.5 Allowing sand and gravel extraction from within the green belt is essential to not only Hertfordshire but the wider Greater London and home counties area to ensure that a sufficient supply of minerals to meet local needs is made. For Hertfordshire I consider that there is very little alternative to sand and gravel extraction occurring from within the green belt.
- 6.6 We respectfully request the Inspector allows the appeal.