

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

Summary

Document – BAL3/3

Brett Aggregates Limited
Robert Brett House
Ashford Road
CANTERBURY
Kent
CT4 7PP

October 2021

Summary

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 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'.

1.3 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. A suggested planning condition is proposed. 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.

1.4 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.

1.5 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. There is insufficient supply from local quarries to meet market demand, as evidenced by the significant imports of mineral into the area.

1.6 According to the Minerals Products Association (MPA), 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. Importantly, in terms of sourcing, the MPA reports 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.'

1.7 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.

1.8 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.

1.9 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. 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.

1.10 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. 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. 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.

1.11 All sand and gravel quarries require a processing plant to wash and grade the mineral arising. To my knowledge and experience all sand and gravel quarry sites in the metropolitan green belt 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.

1.12 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.

1.13 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. These have been mapped. 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. The county's contribution towards sand and gravel minerals supply is entirely dependent upon locations within the green belt.

1.14 Having researched all sand and gravel quarries currently operated within the wider metropolitan green belt, I note that all of these operations contain the features listed above. These have been mapped. 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.

SUMMARY & CONCLUSIONS

1.15 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.

1.16 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.

1.17 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.

1.18 We respectfully request the Inspector allows the appeal.