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Ms Felicity Hart
Spatial Planning and Economy Unit
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Hertford
SG13 8DN

Contact: Kay Mead
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Your Ref: SLUP/CM0963/PL/0870/17
Our ref: 3/17/2352/CPO
Date: 28 November 2017

Dear Ms Hart

Application for the phased extraction of 1.25million tonnes of sand and gravel, mobile dry screening plant, weighbridge, wheel cleaning facilities, ancillary site offices, construction of new access onto Wadesmill Road, with phased restoration of landscaped farmland at a lower level on land.

Land adjacent to Rickneys Quarry, Wadesmill Rd, Chapmore End, Ware

I refer to this Council's previous correspondence dated 20th October in respect of this application, and request that that representation be withdrawn, with this letter substituted in its place as the authority's response.

This response relates to the letter, statement, reports, associated correspondence and detailed plans received on the 4 October 2017 in connection with the proposed development at the above mentioned site.

The Council's response is based on consideration of the proposal regarding the provisions of relevant policies of: the East Herts Local Plan Second Review, April 2007; the national planning guidance of the National Planning Policy Framework; Hertfordshire Minerals Local Plan Review, 2002 – 2016, Adopted March 2007; and, the contents of the emerging Local Plan Pre-Submission Consultation 2016 (currently at Examination). In this respect, it should be noted that, within the District Plan, development is proposed to be allocated to the south of the application site through Policy HERT4, North of Hertford (see more below).

In respect of the Minerals Local Plan provisions, it is acknowledged that this Plan is subject to emerging review. However, being at a relatively early stage of consultation (Regulation 18) from December 2017, the proposal would currently come under the provisions of the adopted Hertfordshire Minerals Local Plan Review, 2002 – 2016, Adopted March 2007. In this regard, the site falls within a Preferred Area (No. 2). Therefore, East Herts Council recognises that the extraction of minerals/aggregates would constitute appropriate development in this Green Belt location.



As such, the Council confirms that it has no objection to the principle of the development. Whilst it is acknowledged that the proposed office buildings, bunds, and associated equipment would fail to preserve the openness of the Green Belt, and therefore represent inappropriate development, these are only temporary structures.

In respect of the detail of the proposed scheme, the Council does have some concern, as mentioned previously, that the site is of an open aspect in an elevated position, publicly accessible, and in the immediate surroundings of Hertford and links to Bengoe and other villages and is less contained than other areas of Rickneys Quarry. However, while there would undoubtedly be some impact during the extraction phase, it is considered that, post-extraction, opportunities would allow for restoration conditions to address these concerns and allow for satisfactory re-profiling of land. In this respect, it should be noted that allocated development is proposed within the Pre-Submission District Plan (currently at Examination) on a neighbouring site to the North of Hertford (HERT4) for residential use (150 homes). In order to address Green Belt concerns, 100 of these 150 dwellings would only be delivered in the event that extraction on the southern element of the current application site had taken place, in order to allow for the re-profiling of land in this location.

The proposal shows the area of development being somewhat detached from direct impact on the majority of concentrated residential development in the area, albeit closer to The Wick, a residential area on Sacombe Road, as well as directly adjacent to a row of residential cottages at the end of Vicarage Lane. In order to address any impact concerns which have been raised over issues such as noise; general disturbance from extraction; traffic (number of lorry movements per day over the extended period of excavation); and, effects on the Green Belt, should permission be granted for the development, conditions should appropriately deal with such matters and also provide details of the future restoration proposals and the period for such works to be completed.

Such restoration proposals should be detailed and established at the outset via conditions, rather than following a generalised approach. Conditions should also ensure that the consideration of sensitive elements of byways and footpaths, in conjunction with other opportunities to extend the footpath network and introduce interpretation opportunities on the land for wildlife and public access, are factored in at this stage. These should also support the opportunity to add mixed woodland planting, biodiversity enhancements and surface water management to introduce ponds etc.

In respect of the use of bunds to help mitigate noise impact, East Herts Council would seek to ensure that the County Council is satisfied that appropriate assessment of the efficiency and efficaciousness of these bunds by way of an independent noise assessment has been undertaken, especially as the noise impact would be of a continual state, which would materially affect the amenities of the local residents over the proposed, and potentially extended, years of the operation of the extraction.

In respect of the character of the site, consideration should be given to introducing conditions intended to ensure that a thoroughly detailed investigation of mitigation measures for noise attenuation is undertaken, including proven additions of significant screen planting of mature trees to support the bunds, which would also serve to improve the visual amenity of the area while in operation.

Furthermore, as the site sits within the Rib Valley, but is largely elevated above other land, the wider adverse impacts of development in relation to the existing landscape could be significant. The land to the east, which slopes down to Wadesmill Road, is a notably sensitive area and it is therefore important that landscape mitigations should be employed in order to help address the effects of invasive proposal and limit the most noticeable and damaging detriments to the visual amenity of the existing area.

Standard conditions should also be attached in respect of restricting the operating hours of the use; control of the lorry routes used, which should expressly exclude other unsuitable routes to the site; and, limiting the number of lorry/vehicle movements expected per day/week.

In summary, and in consideration of the current proposal, East Herts Council has no objections in principle to the proposed extraction, and in respect of the associated temporary built structures, considers that the benefits of extraction and subsequent housing delivery would represent very special circumstances that would clearly outweigh the harm. East Herts Council also seeks to ensure that reasons for refusal for the previous application are addressed satisfactorily. It is therefore requested that the County Council takes the issues and concerns mentioned above into consideration in their determination of the application.

I trust the above comments are of assistance, and would appreciate if you would provide me with a copy of the County Council's decision in due course. Should you seek any further clarification, please do not hesitate to contact me.

Yours sincerely,



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