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**SUSTAINABLE GROWTH**

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Contact : Brian Owen

30<sup>th</sup> March 2022

Dear Richard,

**Re: Town and Country Planning (Environmental Impact Assessment) Regulations 2017  
Regulation 25: Request for further environmental information**

**Proposed application for the establishment of a new quarry on land at the former Hatfield Aerodrome, including new access onto the A1057, aggregate processing plant and other ancillary facilities, together with the importation of inert fill material to restore the mineral workings  
Land at Hatfield Aerodrome, Off Hatfield Road (PL/0232/21)**

In relation to the above application Hertfordshire County Council (HCC) as the Mineral Planning Authority (MPA) hereby request further environmental information under the following headings:

**Population and Human Health / Public Health**

HCC Public Health commissioned a review of the Health Impact Assessment (HIA) which identified the need for further information relating to impacts on population and human health:

- opportunities to maximise health and wellbeing benefits for the 32 year duration of the project;
- definition of the extent of bromate plume (currently), how that may change, and how it will be monitored for the duration of the project;
- potential impacts for mental health /wellbeing related to bromate contamination and silica dust
- emissions affecting air quality over the lifetime of the project;
- noise impacts including any potential effects on educational outcomes

Specific areas where further information is required

*Section 2 - engagement*

- information on how population groups impacted by the development have been engaged in preparing the HIA
- information of how stakeholder groups were directly or indirectly engaged, identification of stakeholders involved, their roles and responsibilities
- engagement with disproportionately affected groups and how this will be mitigated

### *Section 3 - evidence*

- review of the scientific evidence from available sources relating to bromate and silica contamination
- explanation of the relationship between changes to health determinants and changes to risk factors and health outcomes
- identification of local health priorities and how evidence was analysed
- explanation of quantitative findings against relevant benchmarks to assist understanding the project's implications for population health
- information on actual and expected air pollutant concentrations
- summary of relevant noise and water quality metrics /parameters
- summary of consultation activities undertaken and identification of opportunities to improve the project
- discussion of constraints and limitations of the available evidence

### *Section 4 - methodology*

- methods used for determining likelihood and significance
- the reasons for screening out certain health determinants from further assessment
- identification of positive impacts or opportunities to improve health outcomes
- opportunities for phased interim public access strategy to areas not undergoing extraction, or which have been restored, including possible interim uses, to ensure access and routes maximise physical activity and mental wellbeing opportunity
- opportunities to respond with positive measures to reduce community concerns about bromate and silica, including explanation of how the HIA process has explored opportunities to enhance and capitalise on positive health effects
- proposals for regular bromate testing to identify the actual extent of bromate contamination and how it changes over the lifetime of the project
- potential impacts to educational outcomes from frequent intermittent loud noise events during the daytime, addition of noise assessment findings and analysis of the public health implications
- explanation of the use of relevant regulatory standards or thresholds to assess significance of health impacts
- statement and definitions relating to short-term, medium-term long-term, direct, indirect and cumulative impacts on health and well-being
- consideration of cumulative health effects together with other committed development in the local area e.g. 6/2018/2768/OUTLINE; including methods used to assess cumulative impacts related to combined construction and extraction activities affecting current and future residents

## Hydrogeology

The Inspector for appeal scheme considered the Groundwater Management Plan will need to be updated in a number of areas, namely:

- location(s) of monitoring boreholes in each phase of the development
- establishing maximum bromate concentrations at each monitoring borehole
- detailed monitoring programme /timetable
- action/response plans including provision to cease excavation in the LMH if maximum permissible bromate concentrations are breached, or there is evidence of interference with the remediation of the bromate pollution
- provision that mineral extraction will not recommence within the LMH unless the MPA is satisfied, on the basis of compelling evidence being provided to demonstrate that excavation in the LMH can resume without any adverse effect on the remediation of the bromate plume

## Landscape

The Inspector found the appeal scheme, even with progressive restoration, would have an adverse effect on the character and appearance of the area for the 32 year duration of the operation, which he regarded to be of moderate/substantial significance.

In relation to the country park use, the Inspector gave weight to the application site forming part of a country in the context of a wider extensive area of open land accessible to the public at all times (as set out in the original s106 obligation). The Inspector found the LVIA for the 2016 scheme understated the 'likely impact of the operation on extensive areas over a long period of time within a locality that includes a Country Park'. At the Inquiry the Council argued the LVIA does not properly assess the effects from within the Park.

The LVIA for the 2021 scheme is substantively similar and therefore does not fully address the landscape and visual effects upon the Park for the 32 year operation.

Therefore, an updated LVIA is requested, for each phase of the mineral working, to include:

- additional verified viewpoints from within Ellenbrook Park (to be agreed with HCC Landscape Officer)
- landscape and visual appraisal in each phase for activities including mineral working, land subject to infilling, and areas undergoing restoration. The appraisal should assess visual and landscape impacts of ongoing mineral operations (access and haul roads, processing plant) and progressive restoration (temporary haul roads, infilling, and restoration) for each phase in parallel with the establishment of a country park with maximum public access. The appraisal should consider the

- need for additional screen bunds and landscaping to minimise adverse visual and landscape impacts in conjunction with the provisions of the public access strategy (as set out below); and
- provision of a landscape strategy, including detailed landscaping proposals for each phase of the restoration to ensure compatibility with the users of Ellenbrook Park; and
  - detailed planting plans

## **Public Access**

The Inspector noted the s106 allows for public access to be temporarily excluded when minerals are being extracted (pursuant to a minerals permission) although he reasoned 'specifying an access strategy as an integral part of any grant of planning permission is an important consideration in this case'. He further noted 'the appeal scheme does not make a clear distinction for each phase between areas of the appeal site that would be accessible to the public and where they would be excluded for mineral extraction', and, 'some of the permissive routes identified on the plans would be likely to be less attractive to those visiting the Country Park'.

The indicative phasing plans for the 2021 scheme similarly indicate possible routes for restored areas and those areas yet to be worked where public access would be permitted. However the proposals fall short of the provisions within the s106 for unfettered access and the indicative plans do not provide the level of detail needed to comprise an access strategy.

To ensure the access strategy is appropriate and reflects the provisions of the original s106 agreement please provide further information in the form of a written document and plans clearly setting out areas for public access for each phase of the mineral working for the duration of the operation. To be clear, the access strategy must provide for unfettered public access to the maximum possible areas of the Park. The routes must be attractive to users of the Park and delivered to a high standard.

You are advised to consult with the local interest groups, including the inquiry rule 6 parties, as well as the local access forum. I would encourage you to discuss the proposals with HCC Rights of Way Unit. I have forwarded you contact details for the Countryside Access Officers in this area who I understand may be able to facilitate meetings with local access groups.

## **Noise**

The Inspector acknowledged local amenity concerns related to noise, dust and health considerations, and whilst he was satisfied these concerns could reasonably be addressed with planning conditions for the most part, he decided the drawings did not provide sufficient detail of the landscaping and bunds around Popefield Farm, and concluded significant adverse effects may arise for residents there over the 32 year duration of the operation affecting residential amenity, and the likelihood of repeated noise disturbance due to the close proximity of mineral extraction and infilling.

Although the 2021 scheme provides further details of the proposed landscaping and bund construction with the Popefield Farm boundary, the noise assessment does not include measurements of existing background noise levels at Popefield Farm, which would be necessary in order to establish the likely changes to the noise environment, and whether the Inspector's concerns would be fully addressed.

On the western side of the site it is proposed to relocate the site access some 5m to the east to provide space for the construction of an additional noise bund on the boundary, however, the noise assessment does not include background monitoring on the western side of the site that would be necessary in order to assess the effects on the noise environment for the adjoining sites, which include two new housing developments on the adjoining former nursery sites.

Please provide an updated noise assessment to include background noise monitoring for Popefield Farm and the adjoining new housing sites adjacent to the western boundary and predicted noise levels affecting these sites.

## **Heritage**

Proposals for mineral working at Preferred Area 1 should take account of the specific considerations<sup>1</sup>, including –

*Appropriate buffer zones will be required to protect the amenity of residents at Ellenbrook, Smallford and Popefield Farm*

The 2016 scheme provided for substantial soil storage bunds surrounding Popefield Farm from Phase A onwards for the duration of the operation.

The Inspector noted the findings of the ES2016 that there would be minor adverse effect on views of and from Popefield Farm during operational phases, however he concluded that would underestimate the likely impacts on the setting of Popefield Farm.

The Inspector decided the current setting of Popefield Farm makes some contribution to significance of the listed building, and although the appeal scheme would result in less than substantial harm to the significance of the heritage asset, he indicated nevertheless the proximity of the bunds and associated activity in Phases A, B, D and F would diminish appreciation of the farmhouse and its context for a substantial period of time.

The 2021 scheme provides additional tree planting shown on Drawing HQ 3/7 and a soil bund (3m in height) surrounding Popefield Farm to provide a buffer.

The ES2021 assesses the magnitude of change as low adverse and views to the north and west as minor adverse and in a second view looking north-east towards Phase A as medium adverse, which relies upon views being filtered by trees, however, the additional tree planting would not be sufficiently established in the early phases to be provide effective screening.

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<sup>1</sup> Preferred Area 1: specific considerations

Therefore it would seem that the ES2021 similarly underestimates the impact upon Popefield Farm in the early phases until such time as the additional tree planting has been established, which may take a number of years. Please provide an update assessment of the impact on the setting of Popefield Farm for each phase of the mineral working and restoration. Further consideration should also be given to the treatment of this boundary to further minimise the impact upon views to and from Popefield Farm.

Further environmental information will be subject to public consultation for a 30 day period. The MPA will consider any further representations in determining the application.

Yours sincerely

A handwritten signature in black ink, appearing to read 'Brian Owen', with a stylized, cursive script.

**Brian Owen**  
**Team Leader – Development Management**