Hertfordshire County Council has produced a minerals and waste plan detailing their plans for how to manage a supply of sand and gravel until 2040 and how to deal with the management of waste materials.

This plan details three sites that HCC is proposing for mineral extraction. Two of the three sites proposed are close to Ellenbrook.

* MAS01 Briggens Estate which is near to Stanstead Abbotts on the east of the County
* MAS02 Ellenbrook Fields (referred to in the plan as Hatfield Aerodrome)
* MAS03 Land off Coopers Green Lane.

The objections outlined in this document mainly refer to MAS02 Ellenbrook Fields, as planning permission has already been given for MAS03 Land off Coopers Green Lane, and MAS01 Briggens Estate is outside of the area.

We strongly object to the inclusion of MAS02 the former Hatfield Aerodrome site (Ellenbrook Fields) in the plan. MAS02 is effectively an urban quarry close to residential properties and a University, this site is not suitable for quarrying.

Ellenbrook Fields has been included in the mineral plan despite an application to quarry being rejected by the council planning committee and subsequently again rejected by an Inquiry. The reasons for rejection bring into question whether the council should be relying on this site for a significant supply of sand and gravel.

We believe that site MAS02 should be removed from the plan and that HCC should explore alternative sites within the County that may be more suitable.

Our main objections are:

* The Plan fails to adequately reflect that two of the Mineral Allocation Sites (MAS) - MAS02 (Hatfield Aerodrome), and MAS03 (Land adjoining Coopers Green Lane), and Cemex’s existing site in the area would effectively form one vast quarry through a single swathe of the St Albans/Welwyn Hatfield Green Belt. This area of Hertfordshire is being blighted by quarries and we believe that the plan does not fairly take in account the true cumulative effects.
* The Plan fails to adequately consider the risk of having all Mineral Allocation Sites in the same area.  HCC would effectively be relying on one extended quarry (albeit under two operators) and a single problem in the area could jeopardise most of the county’s supply. If the bromate plume were to be disturbed then the whole area could be affected, potentially rendering MAS2 and MAS03 no-go areas in terms of mineral extraction.
* The Plan fails to recognise that Ellenbrook Fields is a unique, irreplaceable valuable resource for the community that promotes health and wellbeing for residents. It is part of Hatfield’s green belt with meadow and grazing land, owls, butterflies, crested newts, and wildflowers and is used extensively by dog walkers, cyclists and ramblers. The Covid 19 Pandemic showed how valuable this piece of land is for local residents. It became a safe haven of open, green space, where locals could get fresh air, go for walks, and not encounter crowds of people. These areas should be fiercely protected by the Council as there is no alternative for local residents or wildlife in the area if quarrying is permitted on this land.
* The Minerals Plan identifies Welwyn Hatfield as having a deficit of green open space, this deficit should outweigh the need for minerals in this area of the County.
* The site is over an area of land contaminated with bromate. We believe that the risk associated with quarrying so close to the bromate should not be ignored or “managed” as when an issue occurs. The bromate pollution, a known carcinogen, is proving extremely difficult to eradicate and any activities that potentially impact the timescale for achieving eradication, ie quarrying on the site, should not be permitted. We believe that due to these complexities this site should be excluded from any quarrying until the Environment Agency have confirmed that the bromate is no longer an issue.
* MAS02 is in Green Belt land and building on this area will effectively join St Albans and Hatfield. We do not believe that any application to quarry on MAS02 will preserve its openness and that it does not demonstrates very special circumstances sufficient to clearly outweigh the harm to the green belt.
* This site has already had an application to quarry rejected on appeal at an Inquiry. We believe that the reasons for rejection are valid for the site not necessarily just for the specific application. Therefore, this site poses a high risk in terms of its viability to deliver the County sand and gravel yield.

*Please reference the policy that you are objecting to in your response to HCC. You may refer to whichever policies / issues are important to you.*

**Policy 1: Climate Change**

Two of the three MAS sites are in Hatfield, but neither are anywhere near to sustainable transportation. Lorry movements to and from the sites are a major contributor to greenhouse gas emissions – this puts an extra 424 lorries (MAS03 250, MAS02 174) on our roads. Possible dumper trucks inside the quarry will be operational every day, these are not expected to have the necessary emission controls. The increase in traffic on an already busy road with frequent traffic delays will be detrimental to the health of local residents
Residents are also concerned about the potential for flooding given that part of MAS02 site is in flood zone 2. Climate change will bring excessive rainfall to the site. As the surface conductivity changes to soil stripping, surface water will flow down the site towards Ellenbrook area which is already partially in Flood Zone 3. The land slopes towards the SE with a drop of 8m.

Restoration and after use are also a potential flood risk as the whole structure and geology will have changed. Holes that were dug are now filled with non-porous inert material. Water that was once naturally absorbed will now flow across the surface to form run-offs and potentially flood low lying areas.

We believe that the impact of climate change on MAS02 could have an effect on the local area surrounding MAS02 in terms of the potential for flooding following excessive rainfall and the increase in greenhouse gas emissions.

**Policy 2: Meeting Sand and Gravel Needs**

We believe that HCC have not considered the risks inherent in concentrating reliance on one area (Hatfield) by recommending that two of the three MAS sites are located next to each other and are next to a current quarry site. This introduces significant risk that the required tonnage will not be delivered.

If there are issues in the St Albans/ Hatfield area, whether with extraction, infrastructure or other factors, a significant proportion of supply for the County would be jeopardised. This is particularly relevant given the bromate factor, where if the bromate is disturbed by any quarry activity, then the viability of delivering the required tonnage may be jeopardised. It should be noted that there are a number of Environment Agency conditions associated with quarrying on MAS02, which if any of them are breached then quarrying may be halted. It is believed that 50% of the required sand and gravel is located in the lower mineral horizon, if digging in the lower mineral horizon is abandoned then there would only be 4MT yield, far short of the expected yield for this site.

We believe that if there are issues in the St Albans/ Hatfield area, whether with extraction, infrastructure or other factors, there is a risk that the required yield would be jeopardised by concentrating MAS02 and MAS03 quarry sites so close to each other.

**Policy 3: Meeting Waste Management Needs**

The area around Colney Heath, West Hatfield and Smallford has more waste sites, waste processing sites and landfill sites than any other area in Hertfordshire. We believe that the policy requires amending to protect communities from the harm resulting from excess waste and mineral sites within a small area.

**Policy 13: Restoration, Aftercare and After-use**

Full restoration and return to a country park, on MAS02, will take place over 30 years. This is far too long to wait for our park. Residents continue to struggle that the timescale proposed meets the definition of temporary (a term used in the plan to refer to the time it takes to quarry and restore a site).

In recent planning applications to quarry on Ellenbrook Fields (MAS02) there did not appear to be any benefit to local residents. A large proportion of the quarry site would be blighted by the plant operations and lorry movements for the entire 30 years; there would be very limited access and most of the park would effectively be a no-go area for over 3 decades.

**Policy 14: Green Belt**

The NPPF states “fundamental aim of Green Belt policy is to prevent urban sprawl”. The aim is broken by coalescing Hatfield and St Albans together with no green belt separator between them. MAS02 breaks all five purposes set out by the NPPF framework. We believe that MAS02 is inappropriate development within the green belt. It is expected that any quarry development on MAS02 is going to last for decades, this is NOT temporary.

MAS02 and MAS03 are both situated within the narrow green belt between St Albans and Hatfield. Waste and mineral development in the green belt is required to demonstrate very special circumstances sufficient to clearly outweigh the harm to the green belt.

We do not believe that any application to quarry on MAS02 will preserve its openness and that it does not demonstrate very special circumstances sufficient to clearly outweigh the harm to the green belt.

**Policy 15: Biodiversity and Geodiversity**

It is difficult to understand how the destruction of MAS02 Ellenbrook Fields provides more benefits than harm to the environment and local area. This area of Hatfield and St Albans has been quarried consistently for the last 60 years. It is time now to stop this and support the biodiversity in the area rather than destroy it.

The land around MAS02 has naturally re-wilded over the last 22 years. Restoration in the future will never bring this condition back. We will lose this wild and valuable habitat to the detriment of many species, in particular protected species. Our own observation indicates that rare birds do exist on the site, these include barn owls and yellowhammer. Great crested newts are protected and are native to Ellenbrook Fields, together with rare butterflies and rare orchids. Secondary disturbance will impact on small mammals, swans, cormorants, herons, and those who exist in ancient woodlands and water habitats near to the quarry.

**Policy 16: Landscape and Green Infrastructure**

The plan fails to demonstrate that there will be no unacceptable landscape and visual effect by quarrying on MAS02 and that appropriate mitigation will be put in place.

The Plan fails to take into account elements from the Hertfordshire Strategic Green Infrastructure Plan 2011.

Ellenbrook Country Park is specifically cited in this plan as contributing to Nature Conservation

“Key opportunities for habitat improvements, restoration and enhancements in Hertfordshire, drawing from the analysis, as follows: Promotion of community forestry, expressing the aspirations of the WCCF Plan, such as at Watling Chase, Oaklands, Smallford Campus and Ellenbrook Country Park and also through links to the Heartwood Forest Project”.

Hertfordshire Strategic Green Infrastructure Plan was drawn up 11 years ago and the Ellenbrook Country Park has developed and blossomed since then. The gravel extraction would effectively destroy the Country Park as it is.

**Policy 18: Historic Environment**

This policy is clear that where there is a heritage asset ie a listed building, and it is affected by mineral extraction then serious consideration should be given to the impact on the asset.

There are three listed buildings adjacent to the mineral site MAS02 (Popefield Farm) which will be directly affected by mineral extraction. The impact on the listed buildings is significant and they will have to endure quarrying right up to their boundary for 30 years.

We do not believe that quarrying on MAS02 will protect, conserve and, where appropriate, enhance the historic environment. Any quarrying on the site will have a significant impact on Popefield Farm for decades.

**Policy 19: Protection and Enhancement of Amenity**

Site MAS02 borders residential properties where residents are likely to be impacted by air quality, particularly the dust, noise from the quarry works and transport, and potentially release of bromate affecting human health and safety.

The Inspectors Inquiry report on a recent application to quarry on Ellenbrook Fields states that the application would have an adverse effect on the character and appearance of the area of moderate/substantial significance. This should be taken in account when drawing up the Mineral Plan.

**Policy 20: Health and Wellbeing**

The plans for MAS02 are so long, three decades plus, that it is hard to see how this site supports the health and wellbeing of local residents and students at University of Hertfordshire.

There is a serious risk to health in the form of silica dust from quarrying on the site. Sand and gravel dust particles will be blown directly across the university playing fields and housing less than 250 m away.

Ellenbrook Fields is a unique, irreplaceable valuable resource for the community that promotes health and wellbeing for residents. It is part of Hatfield’s green belt with meadow and grazing land, owls, butterflies, crested newts, and wildflowers and is used extensively by dog walkers, cyclists and ramblers. The Covid 19 Pandemic showed how valuable this piece of land is for local residents. It became a safe haven of open, green space, where locals could get fresh air, go for walks, and not encounter crowds of people. These areas should be fiercely protected by the Council as there is no alternative for local residents or wildlife in the area if quarrying is permitted on this land.

We do not believe that the quarrying on MAS02 will contribute to positive health and wellbeing for local residents and students.

**Policy 21: Water Management**

**Bromate management**

This policy is very clear that any development proposals must take account of the impact on the water supply and yet bromate, a known carcinogen, is barely mentioned. Any quarrying that disturbs the bromate will have a catastrophic effect on the water supply, water quantity and water quality. It is hard to understand why HCC believes that this is a risk worth taking. The Environment Agency management plan to deal with the bromate currently already wastes 9 million litres of water per day. To put any further pressure on the water supply is an extremely risky strategy particularly when the whole country is under pressure due to the dry summer. If bromate is disturbed then this could threaten the two existing water pumping stations at Roestock and Tyttenhanger, thus putting enormous pressure on the water supply for this area. This comes at a time when there are already drought management plans in force and some areas close by have hosepipe bans.

The Inspectors Inquiry report on a recent planning application to quarry on Ellenbrook Fields highlighted some of the issues associated with the management of the bromate plume. Residents are concerned that nobody still really understands the full implications of quarrying near to the plume and that to deal with issues as they occur is a risky strategy.

It is also clear that it is going to take a long time to eradicate the bromate plume as there is a continuing source of contaminants from the original pollution site at St Leonards Court.

The discussions at the Inquiry highlighted the complexity of managing the plume and ensuring that any conditions as imposed by the Environment Agency could / would be met as quarrying commenced. The Inspector also highlighted that the bromate plume will take considerable management (not just time) going forward.

**Flooding**

The risk of flooding in the local area has also been cited as a concern for residents and we have still not seen anything to allay our concerns. Residential areas, some of which are in Flood Zone 3, University of Hertfordshire, and St Albans Road West are eight metres lower than the quarry area at MAS02, so flooding at the quarry could spread across a wide area.

Part of the MAS02 Hatfield Aerodrome site is in Flood Zone 2 and it is difficult to understand how an area that is in Flood Risk 2 can be an acceptable option in the plan.

Restoration and after use are also a potential flood risk as the whole structure and geology will have changed. Holes that were dug are now filled with non-porous inert material. Water that was once naturally absorbed will now flow across the surface to form run-offs and potentially flood low lying areas.

We believe that the risk associated with quarrying so close to bromate should not be ignored or “managed” as when an issue occurs. The bromate pollution is clearly proving extremely difficult to eradicate and any activities that potentially impact the timescale for achieving eradication, ie quarrying on the site, should not be permitted. We believe that due to these complexities this site should be excluded from any quarrying until the Environment Agency have confirmed that the bromate is no longer an issue.

**Policy 23: Transport Infrastructure Sites**

The proposed quarry sites MAS02 and MAS03 are nowhere near to the transport infrastructure sites, which apparently are “*essential for the sustainable transportation of minerals”.* All transport to and from MAS02 and MAS03 will be by road on an already congested road network as identified in the A414 Corridor Strategy Technical Report September 2019

We believe that as MAS02 is not located anywhere close to a transport infrastructure site that it should not be included in the plan. There are already too many quarry sites in this area

**Policy 24: Transport**

We believe that the traffic impact on the local area has not been properly assessed, in particular the cumulative traffic implications of the combination of sites, including existing sites Cemex and Furzefield) and new sites (MAS02 and MAS03).

Transport by road requires a new road on the already busy A1057. This road cannot take the extra 174 HGVs and may certainly cause traffic chaos at the new entrance on A1057. In conjunction with MAS03 another 250 HGVs are allocated making an extra 424 HGVs. The primary route for both projected quarries is the A1 motorway and the A414 taking a route past residential properties.

MAS02 site (Hatfield Aerodrome) would have a new entrance near Notcutts on St Albans Rd West. The Cemex HGVs would have to pass this entrance, into which MAS02 HGVs would take a right turn across oncoming traffic. This is of real concern to local residents, given daily congestion in the area and a history of road traffic accidents (including fatal incidents) along this stretch of road.

We believe that the local transport infrastructure is already congested and is unable to take the additional lorry movements that would be generated by MAS02 and MAS03.

**Policy 25: Public Rights of Way**

It is difficult to see how public rights of way will be protected and not adversely affected by quarrying on Ellenbrook Fields. Recent planning applications (initially approved by HCC) have failed to ensure that alternative provisions are made and that the promise to keep the Country Park accessible during the proposed 30 years of operation is upheld. This lack of protection for users of the Country Park was made clear in the Inspectors report.

The proposal for MAS02 will impact on the Right of Way between St Albans and Hatfield effectively cutting off the two towns. Permissive pathways currently exist but these will no longer exist during quarrying activity. The only link left will be by car along the A1057.

The Covid 19 Pandemic showed how valuable this piece of land is for local residents. It became a safe haven of open, green space, where locals could get fresh air, go for walks, and not encounter crowds of people. These areas should be fiercely protected by the Council as there is no alternative for local residents or wildlife in the area if quarrying is permitted on this land. This area is effectively cut off from surrounding areas by the A1M and A414. The MAS02 site also has access restrictions through it due to the existing Cemex conveyor system, and it is not possible to safely walk around the north of the site due to fast moving traffic along the narrow Coopers Green Lane.

We believe that access to a unique, valuable open space and public rights of way will be significantly adversely affected during quarrying on MAS02.

**Policy 26: Cumulative Impacts**

We believe that the cumulative effect of the two selected areas MAS02 and MAS03 (in Hatfield) and existing quarry workings has not been properly assessed and breaches national policy and Policy 26 of the plan.

MAS02 and MAS03, alongside the Furzefield Site are all in the same swathe of Green Belt land, adjacent to current and recently active workings on the Cemex site in Smallford. The Plan fails to include any map to reflect the extent of these workings showing how past, existing and proposed quarries are congregated in one small area of Hertfordshire.

80% of all quarries and unquarried land in Hertfordshire are in our area. Cemex has been a quarry site for 60 years. Its extension MAS03 is likely to continue for another 14 years. The cumulative impact of these quarries will affect Hatfield and St Albans in terms of noise, extra traffic, loss of green belt, rights of way and cause a significant negative effect on the surrounding area.

It is difficult to see how MAS02 and MAS03 DO NOT breach Policy 26 which concludes that development proposals will not be permitted where it can be demonstrated that the cumulative impact would result in unacceptable adverse effects on the environment of an area, or on the amenity or health of a local community.

MAS02 will significantly affect the:

* Natural Environment: The appearance, quality and character of the green belt landscape will be destroyed; there will be a risk of flood; and a potential impact on the quality of the water courses, groundwater and surface water due to the fact that this site sits over an area contaminated with bromate, a known carcinogen.
* Built Environment: This area has had to endure HGVs travelling to and from the existing quarries for decades. To increase this further results in an adverse impact for residents for decades.
* Historic Environment: MAS02 has three listed buildings next to at Popefield Farm. Quarrying on this site will have a significant impact on this heritage asset as identified in the Inspectors Report.
* Human Health and General Amenity: There will be unavoidable noise, dust, odour and particle emissions generated by MAS02. Quarrying will take place very close to residential properties along St Albans Road West, Jove Gardens and Radio Place, and also right next to the University of Hertfordshire playing fields.

• Public Rights of Way will be lost across Ellenbrook Fields once quarrying takes place.

* Transport Networks: The proposed entrance to the quarry on MAS02 will route additional traffic onto the already congested Smallford roundabout and there are concerns about the entrance to MAS02 quarry area

Hatfield has been subjected to quarrying for decades. It is not acceptable to continue this for decades longer.

We believe that there is a significant cumulative effect on the area surrounding existing and proposed quarry sites in St Albans / Hatfield and that the site selection for MAS02 and MAS03 combined does not satisfy Policy 26.

In conclusion, MAS02 is a liability due to its proximity to local residential dwellings and educational facilities, cumulative impact on the local area, flood risk, noise disturbance, silica dust, greenhouse gas emissions and threat to water supplies caused by disturbance to the bromate plume.

The selection of MAS02 in the Plan is not supported by robust evidence and has serious significant risks. The combination and cumulative effect of existing and proposed sites in the stretch of Green belt separating St Albans from Welwyn Hatfield is not sustainable and would have a significant impact on the natural environment and the local communities.

MAS02 is not viable with too many negative issues existing and there is a risk that it may not support the mineral land bank for Hertfordshire in the future. Therefore, Hertfordshire County Council should remove it from their mineral plan.