

APPEAL AGAINST REFUSAL OF PLANNING APPLICATION FOR THE ESTABLISHMENT OF A NEW
QUARRY ON LAND AT THE FORMER HATFIELD AERODROME

APPLICATION REFERENCE: PL/0232/21;

APPEAL REFERENCE: APP/M1900/W/24/3346607

APPELLANT: Brett Aggregates Limited

ADDRESS OR LOCATION AND THE NATURE OF THE PROPOSED DEVELOPMENT: Land at Hatfield
Aerodrome, Off Hatfield Road, Hatfield, Hertfordshire

All representations must quote the appeal reference: **APP/M1900/W/24/3346607**

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The Balance Concept

2. *"The Inspector notes that the Hatfield Aerodrome Supplementary Planning Guidance states that a balance should be struck between maximising the use of the mineral resource and protecting the amenity of residents and users of the park. However, he considers that the proposal has not effectively struck a fair balance."*

The amenity of residents

The park is shared by St Albans, Hatfield and London Colney where the population is over 133,500. It is a local facility that improves the quality of life for the residents:

- Green open space for relaxation
- Free to go anywhere you want
- A visual experience
- Walking & jogging paths
- Seating area & picnic spots
- Cycling
- General recreation for people, pets & children.
- Makes the neighbourhood more pleasant and attractive.

The balance Conclusion:

In my opinion the Park is more important than sand and gravel in protecting the health and wellbeing of the residents. This tips the balance in favour of a Park.

The Lagoons

“b) a failure to integrate the restored phases into the unaffected part of EP in a timely manner, **in part due to the positioning of the lagoons**, which means that when the worked-out areas to the west are restored, it will not be possible to integrate them into the unaffected part of the park to the east through extensions to it, until the quarry is in its final stages of restoration.”
extract from a letter from the SoS 11th November 2025

The background as to the position of the Lagoons

In 2014 the Environment Agency EA advised Brett Aggregates that the eastern position of the lagoons would act as a barrier to known bromate pollution in the LMH and protect mineral extraction in phase A and phase B. The present position of the lagoons is shown in HQ 3/1 on the eastern side of the site. The North Recharge Lagoon is taking rainfall runoff and gravel washing water which will recharge into the upper aquifer over time. The South Recharge Lagoon is much deeper and would take “wet” gravel water associated with the lower mineral horizon (LMH) and recharge back into the lower aquifer. Known bromate plume in the N.E may be drawn in by digging in phase A & B. This drawdown effect is suggested to be “minor” by inclusion of a hydraulic barrier by the lagoons. Thereby isolating phase, A & B from the offsite plume.

HQ 6/9, Water Environment 6

Blocked East – West access

The image *drawing 1* shows the location of the lagoons from Home Covert in the North to the University playing fields in the South. It shows how the lagoons block E-W traffic.

Three routes have been proposed, one being a small path between the lagoons, the other main routes are north and south of the lagoons.

Part of the existing concrete runway path has been removed to make way for the lagoons. The concrete path is used by the majority of Park users, but the “narrow muddy track” is avoided as it goes through a cattle field.

The industrial lagoons will become part of the full lifetime of the quarry estimated to be 32+ years.

note - during restoration period the deeper SRL, southern lagoon will be infilled, and diagram 2 shows both linked up together.



drawing 1



Restoration

drawing2

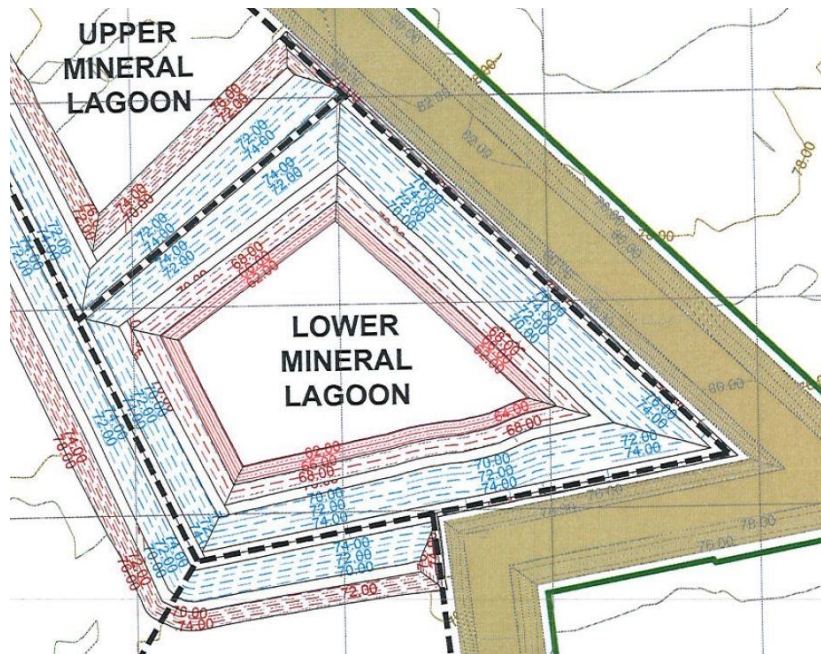
Failure to integrate the park

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There will be no way of integrating land sections or phases in the western part of the Park with the area to the East. In its final stages of restoration the single lake still blocks and splits the Park in two.

Health and Safety around the Lagoons and visualization

If you are crossing the Park, you would have to pass close to the lagoons. This experience will be negative; it is also the most dangerous part of the Park.



drawing3

Drawing 3 shows the depth of the LML or South recharge lagoon is 78-62mAOD = 16m with sheer clay sides. The water level is dependent on seasonal variations.

- Drowning and Physical Hazards
 - Steep sides make it difficult to climb out of
 - Slippery banks – algae – increase fall risk
 - Debris, floating sludge, quicksand
- Toxic and hazardous gases
 - Carbon dioxide, Ammonia, Methane, Hydrogen sulphide
- Biological
 - Bacteria, E.coli
 - Viruses
- Pests
 - Rats, parasites - pathogen spread

A Risk Assessment may be required in the Lagoon area.

Under the Health and Safety at Work Act 1974 the employer must identify hazards around lagoons, assess risk to workers and visitors, implement control measures.

The risk assessment may require that vandal proof high fencing and warning signs be installed on all the three pathways.

A cattle fence would not be adequate:



pic 1

This route is not one that should be promoted for visitors to use.

Reclaimed land and Restoration

Inert filling of the void left over by sand and gravel extraction - change the permeability of the land - an implication for public access across unfettered routes.

The reason why the quarried land changes to Wetland:

Rainfall runoff (before quarry)

Ellenbrook Fields, the proposed quarry site has dense vegetation and sandy soil. The projected rainfall runoff is 5-15%.

Characteristically the land has a dried up “main river” called the Nast, no streams, swales, and no channelled water. Most of the rainfall (85%) is claimed by evaporation and Infiltration into the aquifer.

Essentially access is not restricted by lakes, ponds, rivers or swales, free to go in any direction.

Rainfall runoff (after quarry)

Greenfield Runoff Rate:

122 litres/second for the 71.91 ha site to drain to the restored lagoons.

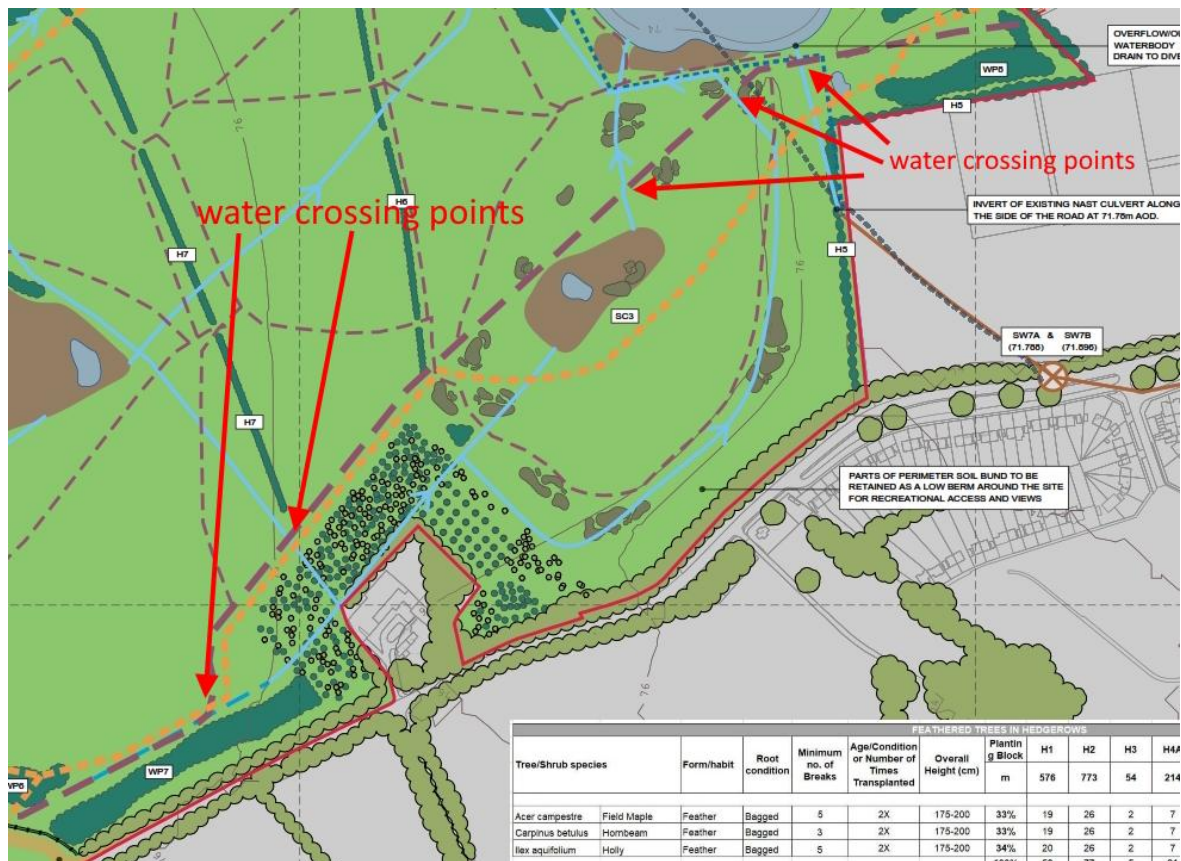
LLFA letter 19th May 2023

The permeability of the land has changed after quarrying due to inert waste filling, an estimate of 6-8Mt of material. Sustainable drainage system (SuDS) must be introduced to manage excess rainwater, flooding by using swales, detention ponds, and channels. This excess water must be diverted to the combined lagoons.

The land now is referred to as “Wetland”

Access is now restricted in a Wetland environment; wet boggy land restricts people and pets to designated paths.

Crossing points over streams



drawing 4

Cross Park access severely restricted by crossing points

In drawing 4, at least 5 crossing points (red) are shown. The Applicant has failed to mark these on the map - even in restoration – but also in phase A reclaimed land back into the park.

It would be expected that these crossing points would be a bridge or pipework. In either case free access over the whole site is restricted as the ground is acting as a catchment for water.

The SuDS system relies on attenuation ponds, swales, streams and culverts to route the water through to the lagoons.

Intermediate drainage period – No SuSDS included

From CD 1703-04 drawing HQ3/9 part of phase A is restored back into the Park. SuSDS scheme has not been included in any of the drawings. It is expected that 3 streams or pipes will be required to drain the parcel of land to the NRL lagoon. I would also suggest that 24/7 pumping would be put into operation.



drawing 5

Drawing 5 shows restored phase A with a multiuser path (dotted). It fails to show any water features including streams, bridges or crossing points.

Without SuDS features the land (phase A) will quickly revert to marsh and become uncrossable.

The Applicant has included in an addendum - CD17.05 Addendum to Environmental Statement 2024 – that:

“Surface water runoff would be intercepted by a network of lined swales and ponds before discharging to the Upper Mineral Lagoon. These features provide attenuation of water and delay the discharge for surface water from the site, reducing flood risk.”

“If the water level within the infiltration lagoon reaches 74.5m AOD, it is proposed that an overflow be provided into the River Nast at the southeast boundary of the application site.”

But fails to show how it integrates into the Public Access Strategy.

Visual attraction and unfettered access

The Park user will be introduced to a display of signs, high fences and 5m bunds on transition through the lagoon’s walkways.

Crossing through the lagoon gap the visitor will be met with an operational quarry - part restored wetland and restricted access almost everywhere.



pic 2,3,4,5,6

These pictures are from local quarries in the area. This shows the visual impact the Park user will experience.

Conclusion

The restored phases cannot integrate back into the Park because of two important reasons:

1. The lagoons split the Park in two for the full duration
2. The land has dramatically changed to a wetland

Visual

The quarry cannot be attractive to the Park user; Restrictive view due to bunds; Quarry workings.

The access is not “unfettered” due to the nature of the reclaimed land. Pedestrians will have to stay on the paths.

Hydrology

At present if 100 drops of rain fall on Ellenbrook Fields they will result in 15 as rainfall runoff, 85 drops will evaporate and infill the aquifer.

The reverse occurs, when 8mt of inert waste is filled into the void; 85 drops will have to be diverted to the recharge lagoon; the transfer can be slow via SuDS or fast by 24/7 pumping.

Reclaimed land

The quarried land must be managed to a greater degree otherwise it will revert to Wetland or Marshland and become impassable.

Mike Hartung

Addendum

This Technical Note has been prepared to respond to the Lead Local Flood Authority's (LLFA) letter of 19 May 2023 that provides comments on planning application reference PL/0232/21.

Set out below is a summary of the analysis that has informed the development of the proposed surface water management strategy to drain the restored landform following completion of quarrying of the mineral reserve. The location of the site is shown by Drawing SWM001."



SWM001

Drawing SWM001 shows Restoration with a gap between the two lakes - it is not in CD17.03-15 HQ3/15 Final Restoration.