

Application Ref: PL/0232/21
Appeal Ref: APP/M1900/W/24/3346607
Land at the Former Hatfield Aerodrome, Hatfield

NPPF 2026

Dear Inspector,

I write in response to the invitation to comment on the relevance of the revised National Planning Policy Framework published in August 2026 and its implications for this appeal.

Having reviewed the revised Framework, I consider that it strengthens, rather than weakens, several of the concerns previously raised regarding this proposal, particularly those relating to public access, safety, inclusivity and the continued functioning of Ellenbrook Fields as a valued Country Park.

In my view, the revised Framework places greater emphasis on whether public access works in practice, rather than whether a route can simply be shown on a plan. In particular, Policy TR4 and Policy DP3 place increased emphasis on the quality of outcomes delivered by development and whether places function safely, inclusively and effectively for all users in practice. Those policies are directly relevant to assessing the adequacy of the revised Public Access Strategy.

A recurring theme of the revised NPPF is that successful development should create places that work well for people in practice. Ellenbrook Fields already works well for people in practice. It is already a heavily used Country Park, used daily by walkers, runners, cyclists, families, dog walkers, older residents and those seeking accessible recreational space close to home.

The question, therefore, is not whether the applicant can provide replacement routes. Policy DP3 is particularly relevant because it focuses on whether development creates places that function well for people and supports safe, accessible and inclusive use. The issue in this appeal is not simply route provision but whether those routes provide an equivalent level of usability, accessibility and convenience to what currently exists.

The Secretary of State directed that the Inquiry be reopened because concerns remained regarding public access to the Country Park. In my view, the revised NPPF reinforces the importance of those concerns because it places greater weight on the quality and usability of spaces rather than their mere existence.

The revised Framework strengthens concerns regarding the applicant's approach to connectivity through the introduction of routes between the proposed lagoons.

The applicant now appears to rely on movement between substantial bodies of open water as part of the proposed solution to the identified public access issues. The lagoons therefore become part of the Public Access Strategy itself rather than simply a restoration feature.

This is important because Policy DP3 places particular emphasis on the creation of places that are safe, inclusive and suitable for everyday use. The key question is not whether a path can physically pass through this area. The question is whether directing families, children, cyclists, dog walkers and other users through an environment dominated by substantial open water features represents safe and appropriate public access.

Policy P5 makes reference to those who need to be considered where physical hazards "such as children where open water.... is present or planned". Large bodies of open water present an inherent hazard. The existence of a path does not remove that hazard. Equally, the presence of fencing does not remove that hazard. Fencing may reduce opportunities for accidental access, but it does not eliminate risk or the potentially serious consequences should something go wrong.

Recent tragic incidents involving children and open water elsewhere in England serve as a reminder that the consequences of such environments can be severe. Whilst no one suggests that such an outcome is inevitable, good planning and good design should seek to minimise foreseeable risks wherever possible rather than increase exposure to them.

The applicant's revised approach to connectivity relies upon movement between substantial bodies of open water, making the lagoons part of the Public Access Strategy itself. Policy DP3 places emphasis on creating places that are safe, inclusive and suitable for everyday use. Whilst mitigation measures may reduce opportunities for accidental access, they do not remove the inherent hazard associated with deep open water. Unlike the existing park, where movement takes place through open fields and along the taxiway, the revised proposals would actively direct users between lagoons as part of a principal east-west route. In my view, this introduces a new safety consideration and reinforces the need to assess public access based on actual user experience rather than the simple existence of a route.

I also consider that the revised Framework strengthens concerns regarding personal safety and the inclusivity of the proposed access arrangements, particularly Policy TR4 1.c and P5 1.a, one of my key concerns around the application.

One of the defining characteristics of Ellenbrook Fields today is openness. The taxiway and surrounding landscape provide extensive visibility in all directions. Users can see who is approaching, who is ahead of them and what lies around them. This is particularly important for people using the park alone.

The proposed routes fundamentally alter these characteristics. Bunds, fencing, lagoons and quarry infrastructure reduce visibility, create blind spots and introduce more enclosed environments. Whilst these changes may appear relatively minor on a plan, they materially affect how people experience and use the space.

This is particularly relevant in the context of Policies DP3 and TR4 and the revised Framework's emphasis on safe and inclusive placemaking. The current park provides long sightlines and open views that allow users to understand their surroundings, assess circumstances and make informed choices about how they move through the landscape.

The proposed introduction of bunds, fencing, lagoons and more enclosed routes materially changes that experience. For many women, the difference is practical rather than theoretical. It is the difference between comfortably enjoying a walk, where you can see what is coming, and consciously monitoring each bend in a route, checking who may be approaching and, at times, clutching keys between your knuckles as a makeshift weapon because the environment no longer feels as open, visible and therefore as safe as it once did.

The revised NPPF strengthens the requirement to create places that are safe and inclusive for all sections of society. In my view, that necessarily requires consideration of how different groups experience public spaces in reality. A route that remains physically accessible but changes behaviour in this way cannot reasonably be regarded as equivalent to the open, visible and well-used routes that currently exist across Ellenbrook Fields.

The result is not necessarily the complete loss of access, but a reduction in practical accessibility for certain groups. In my view, the revised NPPF provides stronger support for considering these real-world impacts when assessing whether development creates genuinely inclusive public spaces.

Having reviewed the revised National Planning Policy Framework, I believe it strengthens the concerns that have consistently been raised throughout this process and that ultimately led to the reopening of the Inquiry.

The revised NPPF, particularly Policy DP3, Policy TR4 and Policy P5, strengthens the argument that public access should be assessed based on outcomes, user experience and inclusivity rather than merely the physical existence of routes. In my view, the revised Public Access Strategy does not achieve those outcomes and therefore fails to address the concerns that led to the reopening of this Inquiry.

The revised NPPF strengthens the requirement to consider:

- whether public access is genuinely usable in practice rather than simply shown on a plan;
- whether proposed routes create safe and inclusive environments for everyday users;
- whether the introduction of routes between substantial bodies of open water creates a new and permanent safety consideration;
- whether access arrangements remain inclusive for all sections of society, including women and other users who rely on open and visible routes; and
- whether the overall design delivers the safe, accessible and inclusive places that national policy seeks to promote.

In my view, the revised Public Access Strategy continues to fall short of these expectations. The proposal replaces open, visible and well-used routes with a more constrained environment characterised by bunds, fencing, quarry infrastructure and movement between substantial water features. Whilst access may remain on a plan, the revised NPPF strengthens the argument that accessibility, safety and usability should be judged by real-world experience rather than theoretical provision.

For those reasons, and particularly referencing the relevant Policies of the revised NPPF, I consider that the revised Framework strengthens the concerns that led to the reopening of the Inquiry and supports the conclusion that the proposed Public Access Strategy remains inadequate. The revised proposals do not preserve an equivalent level of safety, inclusivity or usability to that currently experienced at Ellenbrook Fields and therefore fail to deliver the quality of public access that the revised Framework seeks to promote.

Yours faithfully,

Harriet Redpath