Hatfield Aerodrome

Addendum to Environmental Statement 2024

Brett Aggregates Limited

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Basis of Report

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1.0 Introduction

1.1 A full planning application (reference PL/0232/21) ('the Application') was submitted to Hertfordshire County Council by SLR Consulting Ltd ('SLR') on 3 September 2021 (validated 12 October 2021) on behalf of Brett Aggregates Limited (the 'Appellant'). The description of the Application was 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*"

1.2 In this respect the Application seeks permission to extract 8 million tonnes (Mt) of sand and gravel on a phased basis over a period of around 32 years. Restoration, which would also be phased and would follow behind the mineral working, would involve the importation of inert materials to fill the mineral void and create a new landform combining recreation and nature conservation. The Application also makes provision for the installation of mineral (aggregate) processing plant and a new access onto the A1057 Hatfield Road.

1.3 The Application was supported by a Planning Statement and a comprehensive Environmental Statement (ES), itself supported by monitoring data collected over many years. Further environmental information was submitted in 2022 in response to a request by Hertfordshire County Council under Regulation 25 of the EIA Regulations (the '2022 Regulation 25') and further clarifications provided in 2023. Allied to this several meetings with officers, including Public Rights of Way and Public Health, have been held and a meeting with residents' groups regarding the public access strategy.

1.4 The application was reported to the Development Control Committee on the 31 October 2023. The Council's Professional Officers recommended that the application be approved, subject to planning conditions, aS106 agreement, a deed of variation relating to a 2000 permission to deliver the Ellenbrook Park and referral to the Secretary of Statement.

1.5 The Development Control Committee, rather, resolved to refuse planning permission against officer's recommendation for approval.

1.6 Pursuant to Section 78(a) of the Town and Country Planning Act 1990, the Appellant lodged an appeal on the 2 July 2024. The Appeal was heard at a Public Inquiry which commenced on the 19 November 2024 and lasted two weeks.

1.7 Prior to the commencement of the Public Inquiry a consolidated version of the ES was published, incorporating the information provided under the 2022 Regulation 25, the 2023 clarifications and further information requested by the Planning Inspectorate (PINS) on 22 October 2024. This consolidated ES is referred to as the '2024 ES'.

1.8 On 11 November 2025 the Secretary of State advised by letter that the Inspector considered that the proposals had not struck a fair balance between maximising the use of the mineral resource and protecting the amenity of residents and users of the Ellenbrook Park (EP). In particular it was noted:

> *"a) a failure of the Public Access Strategy to achieve the convenient cross-park access during the life of the quarry that is envisaged by the 2000 Agreement and MLP Policy 18(x), in part due to the proposed rerouting of the two paths which currently cross the site linking Sleepshyde with Salisbury Village in Hatfield;*
> *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 would 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."*

1.9 The Inspector considers that it would be possible to amend the proposal to acceptably address these issues, and has therefore recommended a new condition if the Secretary of State were to grant planning permission, along with changes to other proposed conditions.

1.10 The Secretary State has invited further evidence on the following matters:

> a) the potential for changes to phasing or redesign, or any other provisions, to lead to improved public access to Ellenbrook Park, including to the unaffected eastern part of the Park;
>
> b) implications arising from any changes or provisions identified above, including any implications for the submitted Environmental Statement and signed Deed of Variation;
>
> c) the proposed amended and additional conditions set out above.

1.11 To address the Inspectors concerns the Appellant has considered the following:

- Amending the phasing order to work Phase E in advance of Phase D to keep the southern part of the site open for public access for a longer period of time;
- Providing drawings showing how public access can be gained to stages of phases in advance of mineral extraction;
- Closing the gap in the peripheral bund on the southern site boundary in the vicinity of Popefield Farm;
- Introducing new footpaths (for example between the two lagoons); and
- Moving some of the footpaths away from the edge of the site.

1.12 Of these, the main consideration in the context of the assessments undertaken as part of the EIA is any amendment to the sequence the phases are worked; this is set out in chapter 3 of this Addendum. The other aspects are considered to have no consequences for the EIA

that has been undertaken and so would not affect the conclusions but have been discussed below where relevant.

1.13 In view of the proposed change to phasing, and as requested by the Secretary of State, consideration needs to be given to whether amending the sequence of phases would alter the conclusions reached in the 2024 ES. This Addendum therefore considers the proposed change to phasing for each environmental topic considered within the 2024 ES and assesses whether the change would affect the assessment undertaken and lead to a different conclusion.

2.0 The Proposed Change

2.1 As set out in the previous chapter, the Inspector has reservations on whether a fair balance had been struck between maximising the use of the mineral resource and protecting the amenity of residents and users of the Ellenbrook Park. To address this concern the Inspector has indicated that it would be possible to amend the proposal to acceptably address these issues and has therefore recommended a new condition if the Secretary of State were to grant planning permission.

2.2 In this context the Inspector has suggested the following condition:

> *"Prior to the commencement of mineral extraction, a revised Overall Phasing Plan, an Initial Site Establishment Plan and a Restoration Plan with illustrative sections where appropriate, that recognise the need for there to be convenient east-west public access across the site and an ability to meaningfully integrate restored phases into the unaffected Ellenbrook Park before the completion of the mineral operation, shall be submitted to and approved in writing by the MPA."*

2.3 The Appellant has considered whether the proposed phasing can be amended from that submitted and is putting forward an alternative sequence of phasing the mineral workings.

2.4 In addition, some minor amendments have been made to the public access strategy through the introduction of new paths and moving some of the paths away from the edge of the site.

Submitted Phasing

2.5 Chapter 3 of the 2024 ES provides a description of the submitted development.

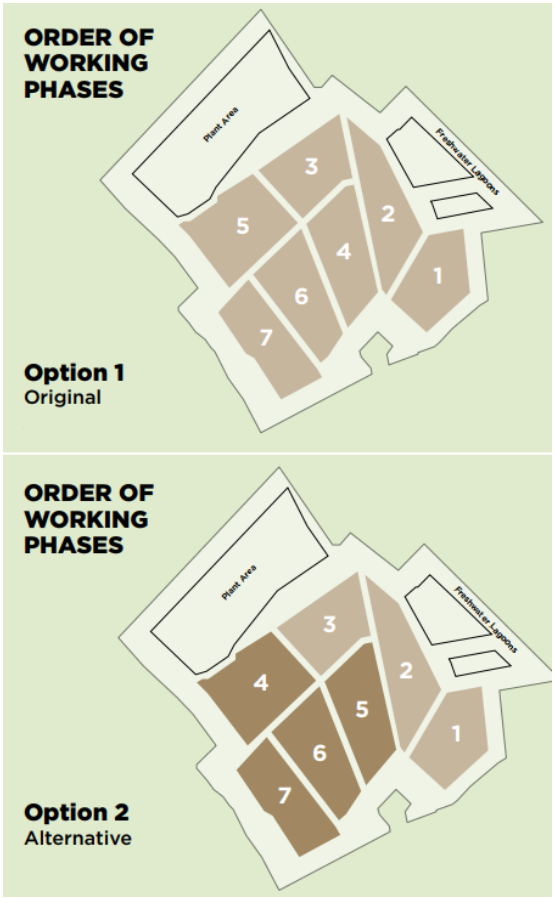
2.6 The submitted working scheme showed the mineral deposit being worked over a series of seven phases (shown as A to G on Drawing HQ 3/1R). The general direction of working would start in phase A, located in the south-eastern comer, advance northwards through Phase B, turn westwards into Phase C and then south through Phase D. On completion of Phase D, the workings would move to Phase E, located to the south of the plant site and again advance southwards through Phase E and F before working the final phase (Phase G). This is referred to as "Option 1".

Proposed Alternative Phasing

2.7 Having reviewed the order of the phases, the Appellant considers that the sequence of the phases could be amended after Phase C. On completion of Phase C, the workings would continue in a westerly direction into Phase E. On completion of Phase E, the workings would commence in Phase D and advance southwards (as per the submitted scheme). On completion of Phase D the workings would progress into Phase F and advance northwards towards, the northern limit of the Phase. The workings would then progress into Phase G and work in a general southerly direction. This is referred to as "Option 2".

2.8 This change to the phasing sequence is illustrated in Figure 2-1 below with the top image shows the submitted order and the bottom image shows the alternative order.

Figure 2-1: Sequence of Phases (top submitted, bottom alternative option)



2.9 There are no changes to the rate of production, method of extraction or plant (fixed and mobile) to be used. The change solely relates to the chronological order of working areas of the site.

2.10 Notwithstanding this, as noted from Chapter 1, a small gap in the peripheral screen mound on the southern boundary (in the vicinity of Popefield Farm) would be closed. This gap was included to allow a footpath to be routed into the site. It is now proposed that the path be routed wholly within the site, on the northern side of the screen mound.

2.11 To illustrate the above considerations the Appellant has updated the Public Access Strategy July 2023 (Appendix 3/3 to the 2024 ES) and produced updated phase drawings.

2.12 The Public Access Strategy is now the Public Access Strategy February 2026. This Public Access Strategy explains that although the entire project is divided into key phases, work progresses in smaller stages within each phase.

2.13 The updated phasing plans show each phase and include additional drawings to show creation of the perimeter seal of the next phase, with crossing points to allow public access into that next phase, to show how public access can be gained to stages of phases in advance of mineral extraction.

Drawings showing the Phased Development

A set of 21 phasing plans has been prepared to show the potential development of the site. The drawings in respect of each of Option 1 and Option 2 are listed below

Table 2-1: Phasing Drawings : Option 1

Drawing No	Title	Revision
HQ 3/7	Initial Site Establishment	S
HQ 3/8	Phase A	S
HQ 3/8-1	Phase A + perimeter seal into Phase B	S
HQ 3/9	Phase B	S
HQ 3/9-1	Phase B + perimeter seal into Phase C	S
HQ 3/10	Phase C	S
HQ 3/10-1	Phase C + perimeter seal into Phase D	S
HQ 3/11	Phase D	S
HQ 3/11-1	Phase D + perimeter seal into Phase E	S
HQ 3/12	Phase E	S
HQ 3/12-1	Phase E + perimeter seal into Phase F	S
HQ 3/13	Phase F	S
HQ 3/13-1	Phase F + perimeter seal into Phase G	S
HQ 3/14	Phase G	S
HQ 3/15	Final Restoration	S
HQ3/16	Popefield Farm	S

Table 2-2: Phasing Drawings : Option 2

Drawing No	Title	Revision
HQ 3/7	Initial Site Establishment	S
HQ 3/8	Phase A	S
HQ 3/8-1	Phase A + perimeter seal into Phase B	S
HQ 3/9	Phase B	S
HQ 3/9-1	Phase B + perimeter seal into Phase C	S
HQ 3/10	Phase C	S
HQ 3/10-2	Phase C + perimeter seal into Phase E	S
HQ 3/12B	Phase E	S
HQ 3/12B-2	Phase E + perimeter seal into Phase D	S
HQ 3/11B	Phase D	S
HQ 3/11B-2	Phase D + perimeter seal into Phase F	S
HQ 3/13	Phase F	S
HQ 3/13-1	Phase F + perimeter seal into Phase G	S
HQ 3/14	Phase G	S

Drawing No	Title	Revision
HQ 3/15	Final Restoration	S
HQ3/16	Popefield Farm	S

3.0 Consideration of the Environmental Effects of Changing the Phasing Order

Introduction

3.1 The 2024 ES included an assessment of the following environmental topics:

Water Environment (Chapter 6)

Transport (Chapter 7)

Landscape and Visual Impact (Chapter 8)

Air Quality (Chapter 9)

Noise (Chapter 10)

Ecology (Chapter 11)

Cultural Heritage (Chapter 12)

Health (Chapter 13)

3.2 Whilst new drawings have been provided, these convey the same information as previously submitted regarding the development, but seek to add a greater degree of clarity. As such, save in relation to the changes identified above, there is no new information contained on the drawings that would require any assessment in the EIA to be revisited.

3.3 The following subsections to this chapter address each of the above topics in turn and consider whether the proposed change to the sequence of phasing, and , where relevant, any other changes, would impact upon the assessment, and in turn, affect the conclusions of the EIA.

Water Environment

3.4 Chapter 6 of the ES provided a detailed assessment of the effects of the scheme on the Water Environment (being both ground and surface waters) and put forward mitigation measures (paragraphs 6.163 to 6.192) in Table 6-17, such that the significance of residual effects would be minor for ten of the eleven potential impacts, with the eleventh being negligible. Overall, it was concluded that the potential impacts to groundwater and surface water that could have arisen from the proposed development would be mitigated by site design and operational plans.

3.5 Assessment of the effects of the proposed development on groundwater and surface water specifically evaluated the phasing of the mineral extraction and site restoration. A primary consideration for phasing design was to avoid the risk of disturbing the flow of bromate impacted groundwater in the Lower Mineral Aquifer (LMA) and the Chalk to the northeast of the site. Mitigation measures were incorporated into the design and operation of the site to achieve this. The following mitigating factors and measures committed to include:

- The groundwater in the LMA beneath the proposed mineral excavation phases is not impacted by bromate and the location and direction of plume migration is parallel to rather than towards the mineral excavation phases.
- The 100m standoff of any mineral excavation phase from the identified bromate impacted groundwater.
- Construction of the lagoons as the first phase of mineral excavation, would accommodate the route of the River Nast culvert as it is built within the western clay wall of the lagoons.
- Restoration via infilling of the Lower Mineral Horizon (LMH) in Phase A and B with low permeability material would form a barrier to groundwater flow in the LMA towards later active mineral excavation phases.
- 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.
- The implementation and operation of Groundwater and Water Monitoring and Management Plan (GWMMP).

3.6 The benefits the above mitigation measures are not affected by any change to the order in which the mineral extraction phases D, E and F are completed.

3.7 No significant residual effect to groundwater or surface water associated with the changing the sequence of the working phases in the proposed development are identified. Furthermore, no new or additional mitigation measure is necessary to safeguard the water environment. Overall, the proposed change to the phasing would not affect the conclusions reported in the ES.

Transport

3.8 The Transport assessment (Chapter 7) considers the effects of HGV movements associated with the export of sand and gravel and the import of restoration materials on the local highway network. The assessment concluded that the residual impacts of the operation of the application proposals would be negligible and would not result in an unacceptable impact on road or junction capacity, driver delay, road safety or amenity; by virtue of this, the application proposal is deemed acceptable in traffic and highways terms.

3.9 The assessment focusses on the projected maximum number of HGV movements that could occur as a result of the development, and how that increase would affect local highway conditions and the environment in the vicinity of local roads. The phasing of the mineral working has no bearing on the transport assessment at all.

3.10 Accordingly, the proposed change to the sequence of the phasing would not have any effect on the assessment and would not affect the conclusions reported in the ES.

Landscape and Visual Impact

3.11 The working scheme was assessed in the 2024 ES (Chapter 8) and examined at the Public Inquiry by reference to working a number of phases. With further work undertaken by the Appellant it has been possible to identify how the phases themselves could be further split

(into sub-phases), enabling part of the land within each phase to remain undisturbed with public access retained when not needed for operational requirements.

3.12 In addition, it has also been possible to enable a public access route between the north and south recharge lagoons, to the east of the site, to enable a public link through the site, in addition to the links shown to the north and south at the planning appeal. This enables more options for access through the site by the public through the operational phase.

3.13 Each phase would be worked by fencing the relevant part of the site required for that phase, and a perimeter ditch formed and lined to control, water ingress and egress. This too would be fenced. Where the access route between the working phase and the processing areas crosses a public route, a crossing point in the fencing would be installed, to enable people to safely cross the haulage route between the different publicly accessible areas.

3.14 One working option is to work the site from phase A to phase G, as shown on the Phased Working Scheme drawings within the ES (and examined at the Public Inquiry). An alternative detailed working arrangement would be to work the phases on the following order, as shown on the drawings listed in Table 2-2:

- Phases A, B, C, E, D, F, G.

3.15 This has the benefit of keeping the working areas more focused at the relevant period of time to the north or south respectively, allowing a greater period of time within the overall life of the quarry, that the land in the respective areas remains undisturbed, and where public access could be maintained.

3.16 In terms of landscape effects, the changes make no difference to the overall landscape effects. The land is still worked and restored, just the timings for different elements of the work changes, so this has no impact on the overall landscape effect.

3.17 In terms of visual effects, the effects on users of the paths would differ, in terms of which parts of the scheme could be seen at what time, but overall, there would be little difference in visual effects, during the times views from each route are possible. The changes to the scheme, however, would provide a benefit in terms of greater parts of the site remaining accessible and undisturbed for longer than was previously shown, owing to the greater clarity being provided on the phasing, allowing parts of each phase to remain accessible, when not required for operational purposes.

Air Quality

3.18 The 2024 ES and its review by DustScanAQ found that the effect of the proposed development on air quality would be not significant. The risk of adverse effects from dust soiling was found to be low in both the 2024 ES and the Dust Risk Assessment subsequently produced by DustScanAQ (Appeal Document BAL4/2).

3.19 The assessment of fugitive emissions undertaken in the ES went beyond what is typically done for a scheme of this nature by quantitatively assessing the impact from fugitive dust sources. In Appeal Document BAL4/2 DustScanAQ additionally undertook a Dust Risk Assessment in line with the relevant Institute of Air Quality Management Guidance, CD7.1. The DustScanAQ assessment supported the conclusions of the assessment in the 2024 ES. Both assessments followed a conservative approach, focussing on those phases with the potential to have the largest impact at offsite receptors, those phases being Phase A, B, D, F and G. In both assessments, presented results show the maximum impact across all assessed phases. The revisions to the proposed phasing sequence does not propose to alter the shape or physical nature of any proposed work phases; the proposal is to adjust sequencing. The methodology of the assessments do not take into account sequencing; rather, each phase

is assessed discretely. Therefore, the proposed change in sequence would not change either submitted assessment, nor the conclusions of those assessments.

3.20 Any increase in public access over the previous scheme would not alter the significance the assessment in terms of the air quality impact (PM2.5 exposure) on the public, since public footpaths are not relevant locations for annual mean exposure (it is mainly only residential locations which are). For dust soiling, similarly, public footpaths are low sensitivity receptors so not vulnerable to significant adverse effects.

3.21 Overall, the proposed change to the phasing order would not affect the conclusions reached in Chapter 9 of the 2024 ES.

Noise

3.22 Consideration of the potential effects of noise emissions from the proposals on nearby receptors was set out in Chapter 10 of the ES. The assessment demonstrated that the proposals would comply with relevant standards/guidelines and thus noise should not pose a material constraint for proposed development.

3.23 The noise assessment predicted noise levels to ten representative receptors located around the working area. For each receptor, development within the closest phase was assessed as follows:

Table 3-1 Receptors Assessed and Closest Phase

Location	Phase
Popefield Farm	F
No.403 St Albans Road West	A
The Lodge	A
No.616 Hatfield Road	G
Pasture View	G
Radio Nursery	G
Walker Grove	A
Nimrod Close	A
Jove Gardens	G
Lawrence close[1]	G

3.24 The revisions to the proposed phasing sequence does not propose to alter the shape or physical nature of any proposed work phases; the proposal is to adjust sequencing. The methodology of the noise assessment did not take into account sequencing; rather, each phase was assessed discretely. Therefore, the proposed change in sequence would not change either submitted assessment, nor the conclusions of those assessments.

As can be seen from Table 3-1 and paragraph 3.23 above, it is clear that working Phase E and then D would have no impact on the results of the noise assessment.

3.25 In view of this. the conclusions of the noise assessment in the 2024 ES would not be affected by the change to the sequence of phasing.

[1] See para 4.16 of PoE Michelle Dawson Proof CD 1.2F.

Ecology

3.26 The assessment on ecological interests is set out in Chapter 11 of the 2024 ES. The assessment considered the potential for the development to affect both habitat and species within the site, along with designated sites in the vicinity of the application site. It also considered the potential for the scheme to deliver a net gain in biodiversity.

3.27 The assessment concluded that the net residual effect of the proposals in terms of the key ecological receptors is anticipated to be at worst neutral and at best a positive effect measurable at least at the District level of significance. The proposals would give rise to minor temporary negative effects on certain key faunal receptors (in particular great crested newts) during various stages of the working sequence, but none of these receptors are predicted to be subject to negative effects of high magnitude (e.g. significant in terms of wider local populations), subject to mitigation measures which, in respect of great crested newts, are required under statute in any event. There is also a high certainty that all temporary negative effects on key faunal receptors related to habitat loss would be at least fully compensated in the long-term through the restoration scheme.

3.28 The proposals for restoration focus on replication of the higher-value elements of the site in its baseline condition, but also seek to exploit opportunities to secure expanded representations of other semi-natural vegetation providing replacement and expanded opportunities for species of conservation importance.

3.29 The nature of the assessment focuses on the potential loss of habitat and how that may impact on species using the site. Suitable mitigation measures have been proposed to ameliorate the identified effects. The assessment therefore does not rely on the sequence of working particular areas of the site. Similarly, indirect effects on any off-site receptors (designated sites) are not affected by the sequence of working, but proximity of operations to the receptor.

3.30 In relation to great crested newts the change to the phasing would not mean that the three tests related to European Protected Species would not be met and there would be no residual negative impact on great crested newts. This would be dealt with post planning permission via either District Level Licencing or standard mitigation licence, depending on the most suitable approach available at the time.

3.31 In terms of restoration the change to the sequence of phasing does not affect the overall restoration scheme and so the proposals would still deliver a net gain for biodiversity.

3.32 Overall therefore, amending the sequence of phasing would not have any effect on the conclusions reached in the 2024 ES.

Cultural Heritage

3.33 Consideration of the potential effects on Cultural Heritage is set out in Chapter 12 of the 2024 ES. The assessment considered the direct effects on the archaeological resource within the site and the indirect effects on designated heritage assets (considering that there are no designated heritage assets within the site).

3.34 The assessment concludes that the effects on archaeology would be negative, but taking into account the mitigation measures and lack of archaeological evidence to date, it is considered that the effect is not significant.

3.35 In terms of the indirect effects on designated heritage assets, only the listed building complex at Popefield Farm could experience an adverse effect of any magnitude. The assessment concluded that taking into account the proposed mitigation measures, it is

considered that the effect upon Popefield Farm is not significant and upon other offsite designated heritage assets the effect is neutral.

3.36 Having considered the proposed change to the sequence of phasing it is considered that the heritage conclusions in the 2024 ES (and proof of evidence of Mr J Edis) are unaffected. More specifically, with reference to paragraph 4.3 of Mr Edis proof, the effects would remain intermittent, low, and capable of mitigation. The GPA3 assessment in Appendix 2 of Mr Edis proof is also unaffected. With this in mind there is no reason why the heritage conclusion of the EIA in respect of a revision to the phasing would have been any different from the conclusion in respect of the submitted scheme.

Health

3.37 A Health Impact Assessment was set out in Chapter 13 of the 2024 ES. The assessment drew heavily from the findings of the EIA, including the assessments on the water environment, air quality and noise.

3.38 The assessment concludes that the proposed development, once appropriate mitigation is taken into account, is not predicted to give rise to any significant adverse health-related impacts, and that there would be some benefits particularly to the economy during the site operation and to biodiversity and public access in the longer term.

3.39 As has been noted above for other environmental assessments, the proposed change to the sequence of phasing the workings would not lead to a different conclusion being reached in the ES. It therefore follows that the proposed change would not have any effect on the conclusions reached in the assessment on Health.

Appendix A Drawing HQ 3/1R

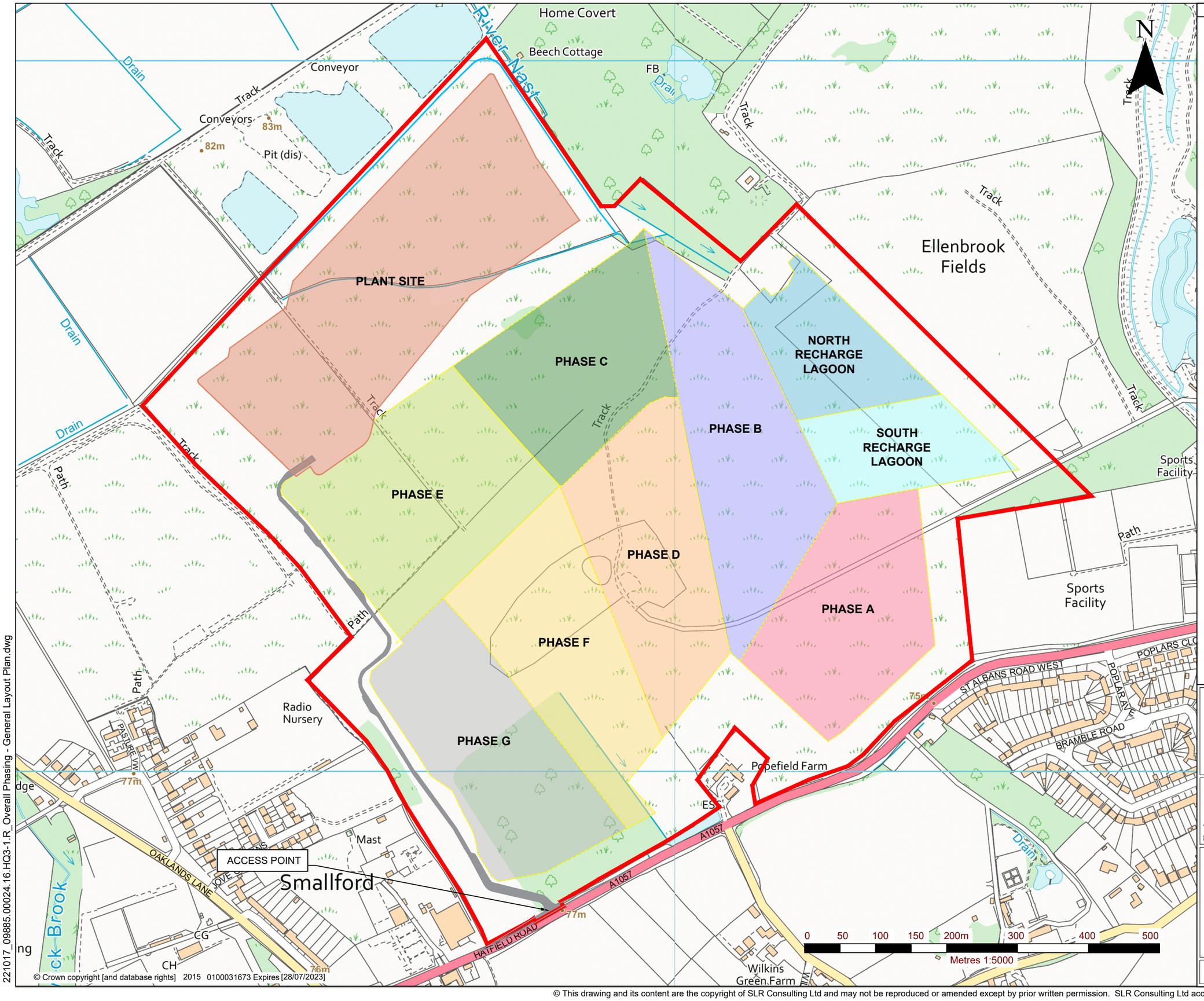
Hatfield Aerodrome

Addendum to Environmental Statement 2024

Brett Aggregates Limited

SLR Project No.: 403.065431.00001

2 February 2026



LEGEND

- APPLICATION SITE BOUNDARY
- PHASE BOUNDARY
- ACCESS ROAD
- PLANT SITE

PHASES

- PHASE A
- PHASE B
- PHASE C
- PHASE D
- PHASE E
- PHASE F
- PHASE G
- NORTH RECHARGE LAGOON
- SOUTH RECHARGE LAGOON

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HATFIELD AERODROME

PLANNING APPLICATION

OVERALL PHASING / GENERAL LAYOUT

HQ 3/1 R

Scale	Date
1:5000 @ A3	OCTOBER 2022

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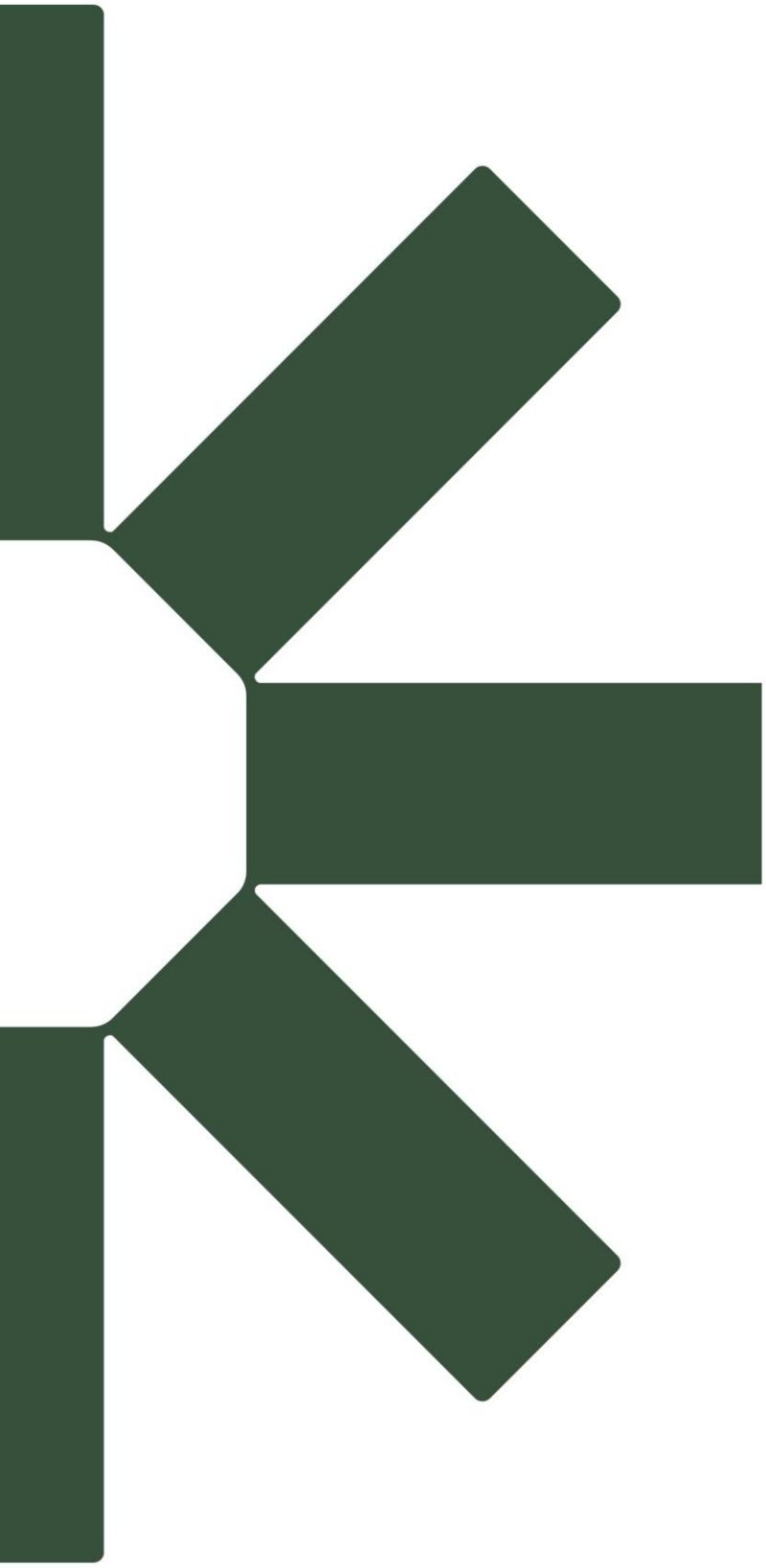

Making Sustainability Happen