

3346607 - Land at former Hatfield Aerodrome, Hatfield: Appellant's Response to Cllr Margaret Eames-Petersen re National Planning Policy Framework August 2026

1. Cllr Eames-Petersen submitted comments on the implications of the revised National Planning Policy Framework (**NPPF**) within a document attached to an email dated 22 September 2026, timed at 07.48. These ostensibly relate to changes in national policy in relation to public health concerns arising from the proposed development.
2. However, the points Cllr Eames-Petersen makes for the most part simply repeat previous comments and do not address the key question asked by the Inspector as to relevant changes in national policy. The Appellant has addressed the substance of Cllr Eames-Petersen's comments through detailed evidence at the inquiries which is not repeated here.
3. In terms of national policy, we make the following points.
4. **First**, most of the 2026 NPPF policies cited by Cllr Eames-Petersen are plan-making rather than decision-making policies. As such, it is essential to draw distinctions between the various elements of the NPPF which are germane to considering certain of the comments that are made.
5. Paragraphs 5 – 11 explain how the NPPF is to be used. This is notably important as it now distinguishes to a much greater extent those aspects that relate to plan-making and those that relate to decision taking. In this regard paragraph 8 states: “the plan-making policies should not be used which making decisions on development proposals”. That is important as various of the references cited by Cllr Eames Petersen are to plan-making policies – those being HC1, HC2, P1.
6. Similarly, paragraph 10 states: “Short objectives are included in boxed text at the start of chapters for context on and should not be applied as either plan-making or decision-making policy”. This too is important as the objective relating to Section 16, Promoting healthy communities, is also cited.
7. **Second**, as to relevant decision-making policies, M4 concerning the impacts of mineral development is cited. The references to “unacceptable adverse impacts” and “unavoidable” effects have been widely referred to in the evidence submitted previously. Significantly, neither of these criteria are materially different to paragraph 224 (b) and (c) of the December 2024 NPPF or paragraph 217 (b) and (c) of the December 2023 NPPF. For the avoidance of doubt, each of these passages includes the highlighted text related to cumulative effects. What is cited by Cllr Eames-Petersen is not a new or altered test.

8. The Air Quality, Noise and Health assessments were reviewed in the context of the revisions to the public access strategy as part of the Environmental Statement (ES) Addendum February 2026 (paragraphs 3-18-3.21, 3.22-3.25 and 3.37-3.39 refer respectively) (CD17.02 and CD17.05).
9. The one other relevant decision-making policy referred to is P3 relating to Living conditions and pollution. Much of this policy echoes the former paragraphs 198-201 of the NPPF 2024.
10. Policy P3(2) criteria (c) and (f) are the two passages that are specifically quoted. These must be considered in the context of P3(1), which intends that development proposals are appropriate for their location. In this instance, the Appeal Site is part of the Preferred Area identified in the Minerals Local Plan (MLP) and the proposed development, as a matter of principle, accords with the MLP. The Minerals Planning Authority (MPA) maintain that the sand and gravel quarry is appropriate in this location, hence its position throughout the Inquiry that planning permission should be granted.
11. In respect of criterion (c) which concerns air quality, evidence has been provided by the Appellant as part of the ES and Mr Allison's written and oral evidence to the 2024 Inquiry (e.g. BAL-04).
12. In respect of criterion (f) which concerns water quality, evidence has been provided by the Appellant as part of the ES, and by Dr Wilkinson and Mr Walton at the 2024 and 2025 Inquiries (e.g. BAL-09, BAL-10, CD17.21). Moreover, this is supplemented by various Statements relating to groundwater (e.g. INQ-30, INQ-31 and CD19.09).
13. **Third**, the remaining comments by Cllr Eames-Petersen's repeat points made previously, do not pertain to changes in national policy, and as such are not an appropriate response to the Inspector's request. For example, there is no policy basis in the new NPPF cited that would support the suggestion of a further public health assessment. As the Appellant has explained, a health impact assessment formed part of the ES, this was reviewed in the 2026 ES Addendum (CD17.05), the MPA assessed that and were satisfied that all health and environmental matters had been properly assessed, and neither the MPA nor the Appellant's expert consultants consider any further changes are required.

28 September 2026