

COLNEY HEATH PARISH COUNCIL

✉ **Postal Address:** Highfield Park Visitor Centre, Hill End Lane AL4 0RA
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To: The Inspector

Appeal Ref: APP/M1900/W/24/3346607

Subject: Representation Regarding Reconvened Inquiry – Additional Documents
(CD17.01–CD17.05)

13th March 2026

Joanna Vincent
Gateley Hamer
(via email: Joanna.vincent@gateleyhamer.com)

Dear Joanna Vincent,

APPEAL REF: APP/M1900/W/24/3346607: Objection to Brett Aggregates' Revised Public Access Strategy – Ellenbrook Fields Quarry Application (Reconvened Inquiry, April 2026)

Colney Heath Parish Council submits the following objection to the revised Public Access Strategy (CD17.02) prepared by Brett Aggregates in respect of the Ellenbrook Fields quarry application. This objection relates solely to public access across Ellenbrook Park, as directed by the Secretary of State.

The Parish Council considers that the revised strategy continues to fail to provide convenient, attractive, and unfettered cross-park access during the life of the quarry, contrary to the 2000 Agreement and MLP Policy 18(x). The main concerns are outlined below, including technical considerations relating to accessibility, safety, and restoration:

1. Pathway Design and Accessibility

- Proposed alternative routes between lagoons are narrow (~3m), grass or gravel surfaces, and bordered by 3–5m high bunds and fencing. Such paths do not comply with BS 8300-1:2018 standards for accessible design, including width, surface stability, gradient, and sightlines.
- The remaining 40% of the concrete taxiway, currently accessible for cyclists, wheelchair users, and prams, will be replaced with paths unsuitable in wet or winter conditions, creating significant seasonal inaccessibility.
- Paths adjacent to haul roads, plant areas, and excavation faces compromise safety and passive surveillance, particularly for children and dog walkers.

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2. Hydrology, Drainage, and Usability

- Grass paths between lagoons are likely to flood or turn to mud in winter, making them impassable. No technical assessment of surface drainage or slope gradient has been provided to ensure year-round usability.
- Proximity to lagoons and excavated areas raises erosion and runoff risks, potentially compromising path stability and public safety.

3. Restoration Phasing and Integration

- The proposed incremental access does not align with the sequencing requirements in the 2000 Agreement and MLP Policy 18(x). No detailed phasing diagrams show how restored areas will provide continuous, accessible routes.
- Soil compaction and landscaping associated with phased restoration will likely delay access, undermining the timely integration of restored areas with the unaffected park.
- Small incremental parcels cannot realistically provide a coherent, attractive, or integrated park experience. This conflicts with Landscape Institute guidance on restoration and aftercare.

4. Visual Amenity and Environmental Impact

- Footpaths will be bordered by bunds, fencing, and adjacent to quarry workings or roads, significantly reducing visual amenity and the attractiveness of routes.
- Access to wildlife and sensitive habitats (e.g., reedbeds, amphibian areas) will be disrupted, potentially conflicting with Natural England guidance and biodiversity net gain obligations.
- Long diversions around quarry operations will prevent the public from experiencing the diverse ecological and landscape features of the park.

5. Safety and Risk Management

- Users will face frequent crossings of haul roads and internal plant roads, increasing collision risk with lorries, dumper trucks, and other machinery.
- Narrow, fenced paths create pinch points, increasing hazards for groups, children, and cyclists.
- No clear risk assessment has been provided for ongoing public access alongside active quarry operations.

6. Overall Failure to Strike the Required Balance

- The revised Public Access Strategy does not achieve a balance between maximising mineral extraction and protecting park amenity, contrary to the

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Inspector's findings and the Hatfield Aerodrome Supplementary Planning Guidance.

- The proposed access routes fail to be safe, attractive, accessible, or unfettered, and the integration of restored areas remains inadequate.

For the reasons outlined, Colney Heath Parish Council considers that Brett Aggregates' revised Public Access Strategy is inadequate and does not meet the requirements for convenient cross-park access or timely integration of restored areas. The Council urges the Inspector and Secretary of State to require a revised strategy that provides safe, accessible, continuous, and visually attractive routes across Ellenbrook Park throughout the quarrying period.

Yours faithfully,



Mrs Lisa Peters LCGI PSLCC CPFA CiLCA
Clerk to the Council
For and on behalf of
Colney Heath Parish Council

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Joanna Vincent
Gateley Hamer
(via email: Joanna.vincent@gateleyhamer.com)

Dear Joanna Vincent,

APPEAL REF: APP/M1900/W/24/3346607: REPRESENTATION ABOUT RECONVENED INQUIRY - ADDITIONAL DOCUMENTS (CD17.01-CD17.05)

Colney Heath Parish Council writes in response to the Additional Documents submitted for the reconvened inquiry concerning the above appeal. The Council wishes to provide the following comments for consideration.

With regard to the proposed Ellenbrook Country Park, the Parish Council notes that the revised Public Access Strategy (CD17.02) seeks to provide incremental access across the park during mineral extraction works. While the intention to maintain cross-park access is acknowledged, the Parish Council has concerns regarding the practical implementation of this approach. In particular, the incremental transfer of land to the Country Park Trust for integration raises significant issues of administrative complexity, potential cost, and clarity around responsibilities for public safety, maintenance, liability, and restoration.

The Parish Council agrees that any arrangements for public access and integration must ensure that the restored areas are delivered in a timely and coherent manner, as intended under the original Section 106 Agreement and subsequent Deed of Variation (CD13.1, CD13.2). The Council supports the principle that Brett Aggregates should retain control of incremental areas during extraction if this approach reduces complexity and ensures that cross-park access and integration can be effectively managed.

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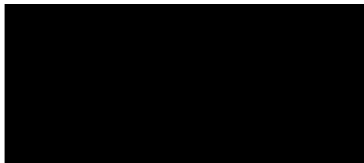


However, the Council considers that the Additional Documents provided do not yet offer sufficient clarity on:

- How the incremental areas will be restored and integrated to meet the standards and expectations of the Country Park.
- The responsibilities of Brett Aggregates, the landowner, and the Country Park Trust regarding maintenance, liability, and public safety.
- The enforcement of standards and conditions to ensure the timely and coherent delivery of public access.

Colney Heath Parish Council respectfully requests that these matters be addressed to ensure that the Ellenbrook Country Park can be delivered in accordance with the objectives of the original agreements and provide a safe, accessible, and fully integrated public amenity.

Yours faithfully,



Mrs Lisa Peters LCGI PSLCC CPFA CiLCA
Clerk to the Council
For and on behalf of
Colney Heath Parish Council