From: [redacted]
To: Joanna Vincent
Subject: Objection to Brett Aggregates' Revised Public Access Strategy – Ellenbrook Fields
Date: 14 March 2026 18:51:39

Dear Ms Vincent,

I am writing to submit a formal objection to the revised Public Access Strategy submitted by Brett Aggregates for the proposed quarrying on Ellenbrook Fields. My concerns relate specifically to the loss of safe, direct, and year-round public access across the park, as required by the Inspector. As a local resident who relies on Ellenbrook Fields for daily travel on foot—including my commute [redacted]—the revised strategy would remove the only practical cross-park route available to me.

Loss of a viable walking route
The existing concrete taxiway is the only surface that provides a safe, direct, and accessible walking route throughout the year. It is wide, visible, and usable in all weather conditions. Under the revised plans, only around 40% of this route would remain. The proposed replacement paths are narrow, grass-based, and—by the applicant's own admission—often unusable during winter months. For someone who depends on walking as their primary mode of travel, this is not a minor inconvenience; it removes my only reliable non-car option.

Proposed routes are not "convenient, attractive or unfettered"
The Inspector was explicit that cross-park access must remain convenient, attractive, and unfettered. The revised proposals fail to meet these requirements:

Many paths would run adjacent to bunds, fencing, quarry workings, or heavy vehicle routes, creating an environment that is neither safe nor appealing.
The narrow grass path between the lagoons would be impassable for significant periods of the year, forcing long and impractical diversions.
Several routes require navigating crossings and quarry traffic, which is incompatible with free movement, particularly for pedestrians.
These are not realistic commuting routes for residents and do not meet the standard required by the Inspector.
The strategy forces residents into cars
If these plans proceed, I will no longer be able to walk to work. The diversions, unsafe conditions, and seasonal impassability leave no viable alternative but to drive. This contradicts local and national commitments to sustainable travel and places an unnecessary burden on residents who have relied on this route for decades.

Failure to integrate restored phases
The positioning of the lagoons prevents restored areas from being connected to the wider park until the very end of the quarry's life. This prolongs disruption for many years and undermines the expectations set out in the 2000 Agreement and MLP Policy 18(x).
Temporary Traffic Regulation Orders (TTROs) could have been considered to maintain access during phased restoration, yet no such options appear to have been explored.

Lack of consultation with Cadent – a procedural defect
It is concerning that Brett Aggregates have not contacted Cadent regarding the revised plans and the potential impact on the main gas line. While consultation is not required until permission is granted, it is highly unusual not to engage with Cadent at this stage given the potential implications for safety, access, and groundworks.

Under the Town and Country Planning (Development Management Procedure) Order 2015 (DMPO), Schedule 4 requires consultation with relevant bodies where development affects their infrastructure. Local planning authorities routinely consult Cadent when:

A high-pressure gas main lies within or near the red-line boundary
Works may affect pipeline easements
Ground levels, access, or safety zones may be altered.
Heavy plant or construction traffic may cross or load the easement. Landscaping, bunding, drainage, or vibration changes could compromise pipeline integrity

If the revised Public Access Strategy alters routes, bunds, ground levels, or construction phasing near the main gas line, consultation is normally mandatory.

Additionally, if the gas main is a Major Accident Hazard Pipeline (MAHP), the Health & Safety Executive (HSE) must also be consulted under PADHI requirements. Failure to do so constitutes a procedural defect.

If permission is granted and Cadent subsequently requires changes, this could fundamentally alter the access strategy and potentially render any decision unlawful due to inadequate consultation. It is therefore reasonable to conclude that the revised plans should have been shared with Cadent prior to submission.

Relevant case examples
There are several planning cases where inadequate consultation with statutory bodies—particularly utility providers—has resulted in delays, legal challenges, or quashed decisions.

For example:

In Hallam Land Management v Secretary of State (2020), failure to properly consider infrastructure constraints contributed to the decision being overturned.

In multiple local authority cases involving National Grid and Cadent, planning permissions have been delayed or amended due to late-stage identification of pipeline safety issues.

These examples demonstrate the importance of early and thorough consultation, especially where public safety and access are concerned.

Conclusion
For the reasons outlined above, I strongly object to the revised Public Access Strategy. It does not provide a workable or safe cross-park route for residents, fails to meet the Inspector’s requirements, and significantly harms my ability to travel sustainably and independently. The lack of consultation with Cadent further raises concerns about the procedural soundness of the application.

Yours sincerely,
Benson Fung
Smallford, St Albans