Re: 3346607 - New NPPF & Land proposed for a sand and gravel quarry- within ELLENBROOK COUNTRY PARK. formerly Hatfield Aerodrome, Hatfield-
comment by Cllr Margaret Eames-Petersen (FSS, FRSPH, MSc, DLSHTM, PGCE, BSc)

It would be helpful if Brian Owen (Spatial planning in HCC) could alert our DPH Sarah Perman about the need for a new Health Impact Assessment,(HIA) of the current design for the Aerodrome/Ellenbrook Park quarry. This is needed from Brett, (with a critique needed by us Rule 6 parties and herself in HCC as our DPH).

The HIA was mentioned very briefly during the Public Inquiry- (22 April 2026) by myself and the inspector implied this would be required, under conditions. But with this new NPPF , and reflection on the increased PH hazards – I believe this should be brought forward. (I know DPH Sarah Perman , is herself away until Oct 5th) .

This HIA should not be taken for granted -since **the design of the quarry has miaterially changed with respect to the closeness of public health hazards to vulnerable receptors** since the second application was made, with "access paths across the quarry " added to the previous appeal submisson statement, submitted for 21 April 20226 :
The new NPPF states on page 52 Section 11 M4

1) Proposals for mineral development should:

M4: Considering the impacts of mineral development

a) Not have unacceptable adverse impact on the natural and historic environment, human health or aviation safety, taking into account the national decision-making policies in this Framework; including as a result of any cumulative effect of multiple impacts from individual sites and/or from a number of sites in a locality.

Residential Hatfield has already had two other CEMEX quarries within the locality in the last 20-30 years and to have another, more dangerous to the health of the student and child population, is disproportionate when the Tarmac quarry at Olive Farm (Briggens estate) in Ware, will have impact on fewer than 10 receptors,(rather than over 5,000 in Hatfield). It can have sustainable transport and could supply more sand and gravel for Herts, than Ellenbrook and the site could possibly be extended Northwards – to increase the landbank .

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b) Ensure any unavoidable noise, dust and particle emissions and any vibrations from blasting will be controlled, mitigated or removed at source, and that appropriate noise limits are established for extraction in proximity to noise sensitive properties.

The impact of Noise and Air pollution from PM2.5 from vehicle emissions and Silica dust on the players on the UH sportsfield, , and pedestrians/ cyclists walking along the new paths across the quarry and students in the UH halls of residents - has not been measured/ estimated yet ,
We have previously asked (2017-2021) for an air-quality monitor fo PM 2.5 on the St Albans Rd side of the Sportsfield due to bus diesel fumes and many cars queuing with car engines idling behind a bus-stopped at the bus stop between 8am and 9am on a week day .The congestion is bad at that time .We suspect WHO standard for PM 2.5 is already exceeded on that road before commencing the quarry, but the meter is not fitted yet. Thee reading wlll only get worse with the quarry lorries using this road, .

The newly proposed paths in April 2026 means that:
The quarry now proposed will

1) Include public paths running across the quarry site, during the quarrying periods, some of which will be less than 20m from the quarrying activity, and inhilation of silica dust, and PM 2.5 particles from diesel vehicles and digging equipment is now very likely. They are serious human hazards, now mentioned in the new NPPF (in section 17) .

2) There has now been some disquiet in the University of Hertfordshire - about the proximity of the quarry to the main UH sportsfield (ie less than 20m from the actual quarrying in stage A) . Over 2,000 students and ***schoolchildren*** *use this sportsfield during term time (the sport- village staff, have the precise details about this for bookings, but local schools also use that Sportsfield, and should have been consulted .* ***. The children with developing lungs are very vulnerable receptors to PM2.5 and Silica dust particles.***

The risks of respiratory health and heart problems (asthma & pulmonary triggers to coronary heart disease) and silicosis for these vulnerable receptors ***are even higher than the case made against the Bengeo Quarry in Herts . (Case ref 3/2077- 13 on Herts CC website)*** *- which also had a Public Inquiry in 2019 . An HIA was required by the previous DPH Prof Jim McManus for this quarry application and all further quarry applications in Herts after this. This Bengeo quarry is where a local primary school was located close to the quarry site (500m).* ***This case was rejected by the inspector. But that primary school was not as close as this UH sportsfield is to the Brett quarry,*** *for the breathing hazards for children and students .*

3*) Also with the prevailing wind from the West and SouthWest, the main de Havilland campus of UH with student halls of residents is within approx 500m, and vulnerable to noise and dust pollution from the quarry.*
Over 23,000 students access this campus and there are 8 halls of residents (each housing over 100 students) , so over 800 students living within that Campus. These students, besides the inhabitants of Popefield farm, are the closest vulnerable receptors to the quarry. We are concerned that constant noise for several hours per day, can be disturbing and cause mental-health problems for students when studying, and extra stress during exam time.

I include below several relevant sections of the new NPPF:

Section 16: on promoting healthy communities , (pg 74-77) and
Section 17 : on Pollution (pg 78- 84) of the new NPPF regarding the public health hazards, with my comments for Hatfield Thank you for your consideration of this.

16. Promoting healthy communities (page 74)

The objective of the policies in this chapter is to promote the creation of healthy and inclusive places and support the provision of appropriate public services, by enabling development which can support this aim and seeking to retain, improve and deliver new facilities which are important for community wellbeing and minimising inequalities.

HC1: (pg 74)

To promote the creation of healthy and inclusive places, and the provision, retention and enhancement of appropriate community facilities and public service infrastructure, development plans should, at the most appropriate level:

a) Be informed by an understanding of any existing deficits *in the availability of community facilities and public service infrastructure* annd additional requirements expected over the plan period, arising from proposed development and wider changes in the local population and public service provision. In doing so, they should take into account both quantitative and qualitative aspects of provision, identified local health needs and opportunities to reduce inequalities through the availability of facilities;

In Hatfield, despite the S106 agreement of 2000, the promised Community facilities of health centre , post office, local shops where neighbours could meet, specified in the s106 agreement – were never built, or negotiated by Arlington (the property arm of BAe) in Salisbury village . Only the Howe dell primary school (replacing one in old Hatfield) and the HD Community hall (to hold 70 instead of 200) were built in 2007/ 8 , as community facilities after most of the housing was built by Bovis , Taylor Wimpey etc.

The residents were short-changed, but at least they were to ***have the First large Public Park for Hatfield: Ellenbrook Country Park as their Green Space for public health walks and recreation*** *. Most houses have very small back gardens in Salisbury village (eg Walker Grove, Barlow close, Nimrod Drive) because they were told they would get a beautiful landscaped Country Park.* ***Then Arlington invited Brett to develop, and then make their quarry application in 2016/2017 .*** *The Salisbury village residents feel cheated and that Arlington were treacherous. WHBC have not attempted to ameliorate . "*any existing deficits *in the availability of community facilities and public service infrastructure" .

b) Set out the facilities and contributions expected from development, including as part of allocations for major development involving the provision of housing;
c) Allocate land specifically for community facilities and public service infrastructure where it is appropriate to do so, and assess whether any land is suitable for designation as Local Green Space in accordance with policy HC2; ***(that was Ellenbrook park in the plan)***
d) Set local standards for the provision of different types of recreational land and facilities, including for **play, sport, informal recreation and allotments.** In doing so plans should draw upon relevant national standards and best practice, tailoring these as necessary to local circumstances and evidence. ***The only large public park in Hatfield***
e) Policies for play and informal recreation should aim to secure a connected network of high quality, inclusive and accessible opportunities as part of the wider network of green space provision, secured through both on-site provision in conjunction with land allocated for development and through other contributions and investment; and
f) Identify wider opportunities to **promote good health, prevent ill-health, reduce health inequalities and support social interaction** through their spatial strategy and land allocations, including through policies for strengthening town centres, locating development where it will support walking, wheeling and cycling and promoting mixed-use developments.

The quarry will not reduce health inequalities -across Welhat BC or across Herts ***–it will widen them.*** *Many of the residents of Salisbury village live in affordable housing*

association accommodation . Sadly - The Park Run no longer takes place in Ellenbrook park, (a popular location pre Covid)-as they anticipate the quarry.

Comment (by MEP)- the problem for Hatfield, and especially for Salisbury village is that Ellenbrook country park IS that special Green space (HC2) , and they are largely losing it.

HC2: Local Green Space

1. Local and neighbourhood plans may designate land as Local Green Space where this would safeguard green areas of particular value to the local community. Local Green Space should be limited to situations where the land concerned is:

. a) In close proximity to the community it serves;

. b) Demonstrably special to a local community and holds a particular local significance, for example because of its beauty, historic significance, recreational value (including as a playing field), tranquillity or richness of its wildlife; *(this all true for Ellenbrook park, and the proud de Havilland history of making planes)* and

. c) Local in character and not an extensive tract of land.

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Designating land as Local Green Space should be consistent with the local planning of sustainable development and the provision of sufficient land for homes, jobs and other needs. Local Green Space should only be designated when a plan is prepared or updated, and should be capable of enduring beyond the end of the plan period.

The extensive s106 agreement of 2000, which WHBC made with Arlington, included Ellenbrook Country Park as the "the local green space" our Public park, balancing this against the building of over 6,000 new houses and many flats in Salisbury village and the new part of Hatfield Garden Village (roads off Campion Rd). Much of Salisbury village is now "affordable housing" owned by Housing associations (as built 2002-2008). But the plan for the ***Green space was an empty promise, by Arlington, if the quarry is accepted. Ellenbook park a has existed for 20 years, but has not been landscaped , and it seems it was not Arlington's plan for it to endure .***

Do the residents who own their houses get any compensation for a quarry? It threatens to devalue all the neighbouring properties to the park ..

17. Pollution, public protection and security

The objective of the policies in this chapter is to ensure that new development is appropriate for its location, taking into account risks posed by pollution and other hazards; that any impacts which development might have are taken into account; and that sufficient provision is made for development required for public safety and security.

Plan-making policies

P1: **Planning for clean and safe places**

1. To support efforts to avoid and mitigate risks from natural and man-made hazards, minimise levels of pollution and create clean, liveable and safe places for people to live, work and visit, development plans should:

. Allocate land for development where, taking into account the potential for mitigation:

i Opportunities can be taken to improve local environmental conditions, such as by remediating despoiled, degraded, derelict, contaminated and unstable land

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(NB the Potassium bromate plume under Ellenbrook park, the worse contamination of a chalk aquifer in Europe , is creeping under the quarry, (verified at the NE corner) and has not been remediated yet. Arlington knew about it in 2003-2008. They were part of the PI in 2008. This is a challenge for the EA (who have not yet been funded to collect independent bromate samples from the boreholes in and around the quarry) . The Brett boreholes in the quarry area are likely to have higher concentration in Summer 2026, when it was very hot . We have not seen the readings for 2024, 2025 ,2026. The land appears to be fairly stable but the plume is gradually moving v.slowly underground . The process of quarrying, into the LMH is risky and despite Brett precautions, likely to change the path of the bromate. To stop bromate being sucked into the quarry area, the current pumping at Bishops' Rise, Water pumping station(WPS) can be reduced , but that in turn will therefore increase the levels of bromate reaching Essenden WP , which currently supplies Hatfield with drinking water vis S. Mimms. It sometimes goes over the WHO limit but is diluted in S.Mimms before supplying Hatfield with drinking water. (This process is explained by hydro- geologist Dr. Mike Rivett in his expert witness report). The quarry is likely to impede current remedition. Remediation would be more effective if pumping was located next to Astwick Manor ,in North end of Ellenbrook park- where the plume is MOST concentrated, NOT in Bishop's rise.

The remediation of the plume is urgently needed not only for Hatfield but to stop further spread to the river Lee and the contamination of East Herts water. The Public Inquiry about the plume in 2008 required Redland and Crest Homes to pay for remediation- but they chose the cheapest option -to pump at Bishops Rise, with already existing pumping equipment (but far from the most concentrated part of the plume). In 2024, 16 years later , the levels of bromate are still 20 x over the limit at Bishops rise- (200 micro gram per litre). This was the wrong solution- and there needs to be another review -with the hydrogeologists present , for a plan for betteer remediation of the plume

NPPF Section 17

i Ground conditions will not inhibit or pose a risk to the nature of the development proposed (such as due to land instability), and occupiers and users will not be put at risk from, or be adversely affected by, unacceptable levels of pollution;

(there are unknown risks, as to whether bromate will move underground once quarrying starts, towards the clean chalk aquifer currently supplying Hatfield's drinking water, via Tyttenhanger and Rostock WPS) .

i Development proposals will not cause unacceptable levels of pollution, either alone or in combination with other pollution sources, taking into account communities which may be particularly vulnerable to its effects, such as children and older people, as well as habitats and species which may be vulnerable to pollution*; (the risks to children from Air pollution ton are covered earlier)*

NPPF P3 c) pg 83

Sustain and contribute to compliance with relevant limit values or national objectives and targets for air pollutants including PM2.5. Development proposals should take account of Air Quality Management Areas and be consistent with the objectives of relevant Air Quality Action Plans, Clean Air Plans and Local Air Quality Strategies; *(we are concerned that St Albans road west will go over the PM2.5 limit, with the quarry lorries – but it has not yet been given a monitor, despite requests)*

P3 f) Assess and mitigate impacts where the development could have an unacceptable adverse effect on water quality, especially in relation to sensitive water bodies such as chalk streams.

Cemex have not been allowed to dig into the Lower mineral Horizon, because of this. Brett are taking unprecedented risks, and if one of the EA conditions is breached, then quarrying will need to stop. This site is a very risky site compared to all the sand and gravel East of the River Lee.

Thank you for considering this and the new NPPF.

Cllr Margaret Eames-Petersen