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Environment Agency

Mr Chay Dempster
Hertfordshire County Council
Minerals & Waste Planning
County Hall Pegs Lane
Hertford
Hertfordshire
SG13 8DN

Our ref: NE/2016/124652/03-L01
Your ref: PL\0755\16

Date: 28 August 2019

Dear Chay

Land at Hatfield Aerodrome, off Hatfield Road

Application for the establishment of a new quarry on land at the former Hatfield aerodrome, including a new access onto the A1057, aggregate processing plant, concrete batching plant and other ancillary facilities, together with the importation of inert fill materials for the restoration of the minerals working.

Thank you for consulting us on the additional information.

We have now reviewed:

- Bromate Plan and dataset version 2, 7 August 2019
- Environmental Baseline report, bromate contours, February 2019

This information shows that the February 2019 bromate plume boundary in the Lower Mineral Aquifer is similar to that presented for this planning application back in 2016. However, before we can formally re-recommend the Water Management Plan planning condition we would like to see current (2019) bromide monitoring results for the site.

The reason for this is that in our response to the 2019 Hertfordshire County Council Minerals Plan consultation, we advised that:

1. No mineral is extracted from within the existing plume of bromate and bromide groundwater pollution.
2. Any activities close to the plume must not change the existing hydrogeological flow regime.
3. Any activities close to the plume must not interfere with the remediation of the bromate and bromide pollution.

This pollution is being regulated under Part 2a of the Environmental Protection Act 1990. As part of this legal process, a Planning Inspector's Report on a Public Inquiry held in 2007 found that:

- whilst there is some uncertainty over the precise extent of the plume, measurements suggest that concentration contours of 0.5 ug/l bromate and 125 ug/l bromide are broadly coincident.
- bromate does not occur naturally in soil or water.
- background levels of bromide in groundwater, in the Hatfield Area, are 50-100 ug/l.

Cont/d..

The Planning Inspector took the view that any concentrations at or above 0.5 ug/l bromate are within the plume of pollution. In practice, as agreed for the neighboring CEMEX Hatfield Quarry extension into Furzefield (PL\0820\16, our response reference NE/2016/126121/01), the 2 ug/l limit of detection may be used to define the boundary of the bromate plume. This is below the 10 ug/l UK Drinking Water Standard and below the 5 ug/l Required Concentration Standard featured in the Remediation Notices dated 2009 and 2019 served on the parties responsible for the pollution.

The Planning Inspector also took the view that any concentrations at or above 125 ug/l bromide are within the plume of pollution. This is below the 500 ug/l Required Concentration Standard featured in the Remediation Notices dated 2009 and 2019 served on the parties responsible for the pollution. Bromide does not have a UK Drinking Water Standard. It is difficult to define the bromide plume boundary caused by pollution from the Contaminated Land Special Site because bromide occurs naturally in groundwater and in road-grit-salts.

In the CEMEX planning application (PL\0963\18 - Land Adjoining Coopers Green Lane, Hatfield Quarry, Oaklands Lane) the associated technical documents assert that bromide concentrations near Hatfield may be higher than concluded by the Planning Inspector in 2007.

If further evidence comes to light demonstrating that current background bromide concentrations near Hatfield in the groundwaters of the Lower Mineral Aquifer and the Chalk aquifer are higher than 125 ug/l then we will reconsider the bromide plume boundary definition.

Should you have any queries please contact me.

Yours sincerely

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