



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

Our ref: NE/2016/124652/03-L02

LPA ref: PL\0755\16

Date: 30 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. Additional information.**

I would like to clarify some points in our letter to you of Wednesday 29 August (124652-03) that may not be sufficiently well-defined, and may have led to some confusion. I have extracted the relevant sections in italics and added the emphasis or extra detail I think will assist you in making your decision. These additional clarifications may also be relevant to the Minerals Plan and to the CEMEX Hatfield Quarry extension.

*..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.*

Locations of concern to the Environment Agency are those within the combined bromate and bromide plume.

*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.*

It is likely that there are other factors affecting bromide concentrations, other than the bromate-bromide pollution plume from St Leonard's Court.

Cont/d..



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*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.*

For additional context, the World Health Organisation states "Concentrations of bromide in fresh water typically range from trace amounts to about 0.5 mg/l" (500 ug/l). Further to this, the WHO recommends bromide limits of 6 mg/l (6000 ug/l) in the drinking water of an adult and 2 mg/l (2000 ug/l) in the drinking water of a child. [WHO 2009. "Bromide in drinking-water. Background document for development of WHO Guidelines for Drinking-water Quality." WHO/HSE/WSH/09.01/6]

*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.*

Background concentrations in Hatfield (i.e. bromide that is not attributable to the St Leonards Court Contaminated Land Special Site) might be demonstrated to be higher than 125 ug/l. If such evidence is forthcoming then we will consider on a site specific basis.

Should you have any queries please feel free to contact me.

Yours sincerely

**Mr Kai Mitchell**  
**Sustainable Places Planning Specialist**

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