

HATFIELD AERODROME

Comparison of 2016 and 2021 Environmental Statements accompanying application reference 5/0394-16 (ES1) and application reference PL/0232/21 (ES2)

ES1 and ES2 follow the same general structure as set out in Table 1 below; ES2 has an additional chapter on Health.

Table 1 also summarises “at a glance” whether there is any change in the assessment conclusion between ES1 and ES2.

Table 2 provides a summary of the main changes to the assessment (whether by way of baseline data, guidance or methodology or the development assessed) and any changes to the conclusions reached from ES1 to ES2 (expanding on Table 1), and considers if the conclusions in respect of the ES1 development are any different when considering the changes to the baseline data, guidance or methodology identified in ES2 .

Table 1: Document Map and Summary

Chapter No	ES1 Title	ES2 Title	Change to assessment?
1.0	Introduction	Introduction	N/A
2.0	Site Description	Site Description	No change
3.0	Development Description NOTE: Further environmental information submitted in August 2016 comprising: (a) a revised restoration concept drawing; (b) details of the final three phases of mineral extraction	Development Description	Slight change in development to be assessed. See paragraph 3.4 for the changes in the development scheme.
4.0	Planning Policy	Planning Policy	Policy references updated.

Chapter No	ES1 Title	ES2 Title	Change to assessment?
5.0	Alternatives	Alternatives	No change.
6.0	Water Environment NOTE: Further environmental information submitted in January 2020 comprising: (a) Groundwater Management Plan (b) Borehole Monitoring Data 2013 - 2019	Water Environment	No change.
7.0	Transport NOTE: Further environmental information submitted in August 2016 comprising: (a) new access arrangements including a right turn lane; (b) Transport Assessment addendum assessing HGV numbers and impacts on key junctions	Transport	No change.
8.0	Landscape and Visual Impact	Landscape and Visual Impact	No change.
9.0	Air Quality	Air Quality	No change.
10.0	Noise	Noise	Slight change. See Table 2.
11.0	Ecology	Ecology	No change.

Chapter No	ES1 Title	ES2 Title	Change to assessment?
12.0	Cultural Heritage	Cultural Heritage	No change.
13.0	Cumulative Impacts	Health	N/A.
14.0	Not Used	Cumulative Impacts	No change.

Table 2: Changes to the ES

Topic	Changes to Assessment	Changes to the Conclusions Reached	Application of 2021 assessment to 2016 development
Water Environment	<p>The assessment in ES2 follows the same methodology and general structure to ES1.</p> <ul style="list-style-type: none"> • New appendices include updated Water Framework Directive Compliance Assessment (6/6); Flood Risk Assessment (6/9); Groundwater and Water Management Plan (6/10) and a response to the scoping questions posed by Affinity Water (6/11) • Baseline data updated to take into account: <ul style="list-style-type: none"> ○ Additional monitoring data (boreholes, groundwater levels, chemistry) 2020-21 ○ Updating bromate data 2020-21 • Additional guidance referred to include: <ul style="list-style-type: none"> ○ Environment Agency's Groundwater Protection Policy, March 2017 (https://www.gov.uk/government/collections/ground-water-protection); ○ The Water Environment (Water Framework Directive) (England and Wales) Regulations 2017 in England and Wales; ○ Guidance for Pollution Prevention (GPPs) which replaced the Pollution Prevention Guidelines ○ The SuDS Manual (Report C753). CIRIA, 2015; ○ National Planning Policy Framework, Department for Communities and Local Government (June 2019); ○ CIRIA Report C624, Development and flood risk – guidance for the construction industry (October 2004); ○ BS8533:2017, Assessing and managing flood risk in development – Code of Practice (December 2017); ○ Department for Environment, Food & Rural Affairs and Environment Agency (2015). Flood risk assessment: local planning authorities (at 	<p>No change to the conclusions reached.</p> <p>Overall, it is concluded that there would be no significant residual effects to groundwater and surface water from the proposed development after inclusion of the identified mitigation measures.</p>	<p>In relation to the water environment the ES2 scheme is similar to ES1. Differences relating to the water environment are:</p> <ul style="list-style-type: none"> • Removal of an option to dewater (locally lower) groundwater in the LMA at certain locations during extreme seasonal periods when it may be expedient to do so • Addition of a minimum 100m (previously 50m) standoff from BH104 for extraction of the Interburden and the LMH <p>Applying the additional baseline data and guidance in ES2 does not affect the assessment of the ES1 scheme. It is not anticipated that the option to lower groundwater in the ES1 scheme would be utilised.</p>

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	https://www.gov.uk/guidance/flood-risk-assessment-local-planning-authorities).		
Transport	<p>The assessment in ES2 follows the same methodology and general structure to ES1 ES2 refers to the Hertfordshire Local Transport Plan 4 (adopted 2018)</p> <ul style="list-style-type: none"> • Photographs showing Local Highway Network updated • Reference included to A414 Corridor Strategy (2019) • Additional traffic flow data (DfT Road Traffic Statistics) used in addition to data captured in 2015 • Accident data updated • Assessment provides for a small reduction in HGV movements (10 per day, 6% reduction) but no change to the routing of HGV's (i.e. all vehicles turn left out of the gate) 	<p>No change to the conclusions.</p> <p>The residual impacts of the operation of the application proposals would be negligible and would not result in an unacceptable impact on road or junction capacity, driver delay, road safety or amenity; by virtue of this, the application proposal is deemed acceptable in traffic and highways terms.</p>	<p>In relation to baseline data, the COVID pandemic resulted in significant changes to the pattern of road usage since March 2020. As a result, it was not appropriate to use updated ATC data for ES2. Instead, published data (2018) from the DfT website has been obtained to 'sense check' the ATC data in ES1. The 2018 data shows a reduction in both total and HGV flows.</p> <p>ES2 uses the 2018 data and thus with lower flows provides a worst-case scenario (Table 7-10 in ES2 and Table 7-9 in ES1)</p>
Landscape and Visual Impact	<p>The assessment in ES2 follows the same methodology and general structure to ES1.</p> <ul style="list-style-type: none"> • Baseline assessment updated to take into account new housing development on western boundary (Jove Gardens) and outline application for housing development on eastern part of former Aerodrome site (Hatfield Garden Village). • More detail is provided regarding Landscape planning context • Assessment based on the removal of the concrete batching plant and changes to the access road, but references the 2016 ES in terms of ZTV and Viewpoint Photography. • No change to the landscape baseline in relation to character assessments • Additional consideration provided in ES2 of potential cumulative effects with Hatfield Quarry and proposed housing development • Additional consideration of Functionality of the Green Belt 	<p>No change to the conclusions.</p>	<p>There is little change to the policy framework or Landscape Character Assessments since the 2016 ES. Moreover, the guidance for undertaking LVIA has not changed.</p> <p>ES2 updates ES1 by taking out references to the concrete batching plant, but relies on the ZTV and Viewpoint photography undertaken and presented in ES1. In this respect the ZTV is based on the tallest structure and so represents the worst-case scenario.</p> <p>There is no change to the assessment of landscape character. In terms of visual impact, the ES2 can be relied on to assess the effect of the ES1 scheme; the concrete batching plant is located within the plant site and so references to plant site can be taken as including the concrete plant. The concrete batching plant would not introduce any additional effects over the</p>

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			processing plant. In addition, there is a high degree of visual enclosure around the site boundary due to mature hedgerows; this limits visual impacts outside of the site.
Air Quality	<p>The assessment in ES2 follows the same general structure as ES1, but adopts a different methodology. The ES1 assessment was based on a qualitative assessment of the potential effects of fugitive dust emissions, supported by modelling of HGV (NO2) emissions (Appendix 9/1). The ES2 assessment is based on a quantitative modelling approach for PM10 and PM2.5 emissions along with NO2 emissions from HGVs supported by two appendices setting out the modelling methodology and modelling results.</p> <ul style="list-style-type: none"> Assessment refers to guidance published since ES1, for example <ul style="list-style-type: none"> Defra: 'LAQM Technical Guidance 16' (LAQM.TG(16)) (2021); Institute of Air Quality Management (IAQM) and Environmental Protection UK (EPUK): 'Land-Use Planning and Development Control: Planning for Air Quality' (2017); IAQM: 'Guidance on the Assessment of Mineral Dust Impacts for Planning' (2016); United States Environmental Protection Agency: 'Air Pollutant 42' (US EPA AP-42) (2021); ES2 Assessment includes additional and updated baseline AQ data ES2 Assessment considers cumulative effects with Hatfield Quarry 	<p>No change to the conclusions.</p> <p>The modelling undertaken in 2021 has shown for NO2, PM10 and PM 2.5 the potential emissions would be negligible. As such it confirms the conclusions reached in ES1.</p>	<p>Whilst there is a change in assessment methodology between ES1 and ES2, both methodologies are acceptable for minerals development. Indeed, the approach adopted in ES1 is more common. However, to be able to feed into a Health Impact Assessment, modelling of the emissions was undertaken in ES2.</p> <p>The model does not include the concrete batching plant; however, this is not considered to affect the assessment. Concrete batching plants operates on a 'wet batch' process and so the likelihood of dust emissions are low; moreover, the operation of a concrete batching plant is subject to a permit issued by the local authority. Emissions from the concrete batching plant would therefore be negligible; this is borne out by many concrete plants being located within urban environments.</p> <p>The ES1 Assessment did not examine emissions from the concrete batching plant, with emissions from overall 'processing' operations considered low.</p> <p>In view of this it is considered that the ES2 assessment is appropriate to support the ES1 scheme.</p>
Noise	The assessment in ES2 follows the same methodology and general structure to ES1.	The conclusions of the noise assessment remain broadly the same.	The ES2 baseline data may be affected by changes to daily life caused by the COVID pandemic (such

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	<ul style="list-style-type: none"> Relevant guidance, namely the Planning Practice Guidance remains the same as does BS 5228-1:2009+A1:2014 New noise monitoring undertaken in May and June 2021 including an additional location at Jove Gardens. A comparison of the 2016 and 2021 monitoring is set out in para 10.42 of the 2021 ES Plant and equipment remain the same, save for exclusion of Concrete plant (see Table 10-6). Access road has moved by 5m away from receptors on western boundary. Outline Noise Management Plan provided in ES2 (Appendix 10/3) 	<p>Noise from construction operations would be below the 70dB(A) noise limit for all receptors assessed.</p> <p>Noise levels from operations would be at or below the 10dB increase over background limit. The exception would be Nimrod Gardens, where the noise levels would be 1dB(A) over this limit and Jove Gardens where the noise levels would be 3dB(A) over this limit. This is due to lower baseline levels being recorded in 2021.</p>	<p>as home working). In view of this the data does need to be treated with some caution.</p> <p>The 2021 assessment excludes the concrete batching plant (CBP), which would be a source of noise within the site.</p> <p>Consideration has been given to comparing the 2016 noise model (which includes the CBP) against the 2021 noise data and an Addendum has been produced.</p>
Ecology	<p>The assessment in ES2 follows the same methodology and general structure to ES1.</p> <p>The CIEEM Guidelines were updated in 2018 and have been incorporated into E2S.</p> <ul style="list-style-type: none"> Baseline surveys have been updated in 2021 for: <ul style="list-style-type: none"> Wintering bird survey Phase 1 habitat survey (completed to UK Habitat Classification in 2021 compared to JNCC Phase 1 habitat survey methodology in 2016). Incidental records for invertebrates, breeding bird, barn owl, bats and badger were undertaken during surveys Great Crested Newts Desk based data searches updated, including new request from Hertfordshire Environmental Records Centre 	<p>No change to the conclusions.</p> <p>The net residual effect of the proposals in terms of the key ecological receptors is anticipated to be at worst neutral and at best a positive effect measurable at least at the District level of significance.</p>	<p>The changes introduced in the ES2 scheme do not alter the assessment compared to that undertaken in ES1. As such, the ES2 assessment can be used to assess the ES1 scheme. That assessment gives the same conclusion as in ES1 that the net residual effect of the proposals in terms of the key ecological receptors is anticipated to be at worst neutral and at best a positive effect measurable at least at the District level of significance.</p>
Cultural Heritage	<p>No update has been undertaken since ES1</p> <p>As part of the EIA scoping exercise with Hertfordshire County Council, it was agreed that Cultural Heritage could be scoped out of the EIA.</p>	<p>No change to the conclusions.</p>	<p>The chapter has not been updated as part of ES2. The ES1 assessment is still appropriate for assessing the ES1 development.</p>

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Health	This is a new chapter in ES2 compared to ES1. A Health Impact Assessment is provided at Appendix 13/1 . This draws on various assessments provided in ES2, for example Air Quality, Noise, Landscape and Visual, Transport.	As this is a new chapter produced in ES2 there are no changes.	Given that other assessments in ES2 (such as noise, air quality and LVIA) can support the ES1 scheme in terms of assessing the likely significant effects, the Chapter on Health can be used to support the ES1 scheme.
Cumulative Impacts	The assessment in ES2 follows the same methodology and general structure to ES1. Updated to take into account a planning application for a new housing development on land to the east of the site. As with ES1, consideration is also given to CEMEX Hatfield Quarry	No change to the conclusions.	The chapter reflects changes that have occurred in the period since ES1 and so brings the ES1 assessment up to date. Like the 2016 version, the 2021 chapter draws together the findings from various environmental assessments to consider potential cumulative effects in a holistic fashion. As these other environmental assessments (as discussed above) are capable of supporting the 2016 scheme, this chapter is also capable of supporting the 2016 scheme.