

## Appendix 1:

# Hatfield Town Council: objection to Brett Quarry-2nd application

Planning Application Ref No PL/0232/21  
Land at Hatfield Aerodrome, Off Hatfield Road

This is a summary of **Hatfield Town council's (HTC) objection** that we submit to the County Council in reference to the above application for quarrying on Ellenbrook Fields.

A similar application was rejected by Hertfordshire County Council in 2020, and is currently being appealed by Brett (the applicant). This new, amended Brett application was submitted in October 2021. Most of our concerns that we, as HTC, raised on behalf of Hatfield residents to the first application still stand, but we make some further observations and objections now that further information is available. There are some minor modifications made by the applicant. We have summarised our main issues into **six points**.

### 1) Cumulative Impact on Hatfield

This small residential area of Hertfordshire has already been subject to quarrying for well over 85 years. This application will extend the quarrying for another 32 years at a minimum. If given permission, Hatfield, a growing town of 43,000 residents, will have been subjected to quarrying for circa 120 years. This is more than a lifetime. It is **disproportionate and unacceptable** to concentrate so much quarrying, with adverse public health effects on its population, in one small town. We do not believe that the cumulative impact of having three quarry sites (as previously shown in the mineral plan) in one small part of Hatfield has been fairly assessed as part of the planning process and should be reconsidered. The other CEMEX Hatfield quarry uses conveyor belts for transport and does not dig lower than the upper mineral horizon, so is less dangerous to contamination of the public water supply, and to air-quality for residents.

### 2) Green Belt and the Country Park

Ellenbrook Fields was promised by Arlington as **Hatfield's first public country park** to residents under a Section 106 agreement, in 2000. Despite 20 years having passed, this has still not been set up, as agreed. The Country Park Trust must be set up before any planning application is considered to protect this valuable resource and ensure that activities on this site are agreed in accordance with the Section 106 document.

Ellenbrook Fields is a unique, irreplaceable and valuable resource for the community that promotes health and wellbeing for residents. It is part of **Hatfield's green belt** importantly dividing St. Albans land from Hatfield, with meadow and grazing land, owls, butterflies, crested newts, and wildflowers. It is used extensively by dog walkers, cyclists and ramblers and will be a huge loss to the community if it were to be lost to quarrying. There is no alternative for local residents or wildlife to this location in the area if the quarry goes ahead. It has also been used weekly by over 300 local people for the **park run**.

The Covid 19 Pandemic showed how valuable this piece of land is for local residents. It became a safe haven of open, green space, where locals could get fresh air, go for walks, and not encounter crowds of

people. These areas should be protected by the Council for public health and not handed over to developers, or quarrying.

This quarry will effectively destroy the green belt between Hatfield and St Albans in our lifetime. The “Development of Evidence” for Welwyn Hatfield Local Plan: **Green Gap Assessment** clearly states that it is **inappropriate to build on the green belt between Hatfield and St Albans along the A1057**. It has identified this land as a **gap policy area** to prevent the future merging of Hatfield with St Albans.

### 3) Pollution & the Bromate Plume

Ellenbrook Fields overlays an area with a “bromate plume” underground. This is a known carcinogen. It is recorded by the Environment Agency (EA) and Public Health England (PHE) in 2008, as the worst contamination of a chalk aquifer in Europe. It occurred as a result of a major pollution leak, discovered in the year 2000, when the Hatfield, Bishop’s rise water pumping station (BRWPS) was tested for Bromate, and was found to be 20 times over the WHO limit, and subsequently shut. The pollution originated from Steetly Chemical Factory, Sandridge, which had been dumping “waste bromate” down a sump some 30 years previously. This has leaked into the chalk aquifer, 16m underground, resulting in a bromate plume which has now travelled 20km underground, all the way from Sandridge to Broxbourne, and the New North River and the River Lee.

A large part of the plume now lies underneath Ellenbrook Fields. This contamination is a disaster for Hertfordshire’s water supply, and considered by the experts to be the **worst ground water contamination event in Europe**. On close inspection of 29 borehole readings in the area, taken since remediation started in 2008 and continuing to date, we have seen that that bromate and bromide are located below the dig site and very close to it. This means that quarrying poses a major risk to disturbing the plume, which could then contaminate an otherwise clean chalk aquifer, currently supplying Hatfield with drinking water.

This means that the EA conditions stated in 2019- regarding quarrying in the local area viz

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

Are likely to be breached from the outset, if quarrying commences at this site.

We are concerned that despite the effort being made to stop the plume, it continues to spread and the concentration of bromate has not decreased in Hatfield, despite the remediation 2008-2021. The risks of disrupting the plume, seems so very high, that the strategy of a quarry in this location, when there is at least one other safe viable quarry site in Hertfordshire, seems unreasonable. It is likely to cause the Herts mineral plan to fail, and should not still be in the Herts mineral plan. There is an alternative, safe quarry, without bromate underground, not close to a residential estate, but located on the A414 at Olive Farm in Ware in East Herts, able to produce more sand and gravel, than the Ellenbrook location.

We are extremely disappointed about the risky approach that the **Environment Agency** has taken so far towards this application and the slow and incomplete method of remediation, when they have seen first-hand the devastating impact bromate has on the environment, on Hatfield’s drinking water and the extreme difficulty it poses for removal, once contamination has occurred.

### 4) Public Water Sources

The bromate plume has already affected the land and water supply in and around our area of Hatfield. Two local pumping stations have already been affected by the plume; one in Hatfield had to be closed when it

was realised this was putting contaminated water into the public water systems; the one in Essendon is closely monitored to ensure that the drinking water remains below WHO guidelines, this means that Affinity Water have to keep turning it off and mixing the water with uncontaminated water to lower the bromate concentration in order to keep the community supplied with clean, safe drinking water. If the plume continues to move in a southerly direction it will start to affect the remaining uncontaminated water pumping stations. We do not believe that any risks to the remaining supplies in the area should be taken.

Affinity Water (AW) and the Environment Agency have both made media statements in 2019 regarding the scarcity of water in the future. We find it difficult to believe that the Environment Agency and Affinity Water can make such statements whilst still looking to give their permission to this quarry which could contaminate further source water, the slightest risk to this valuable commodity should not be taken. Not only have both organisations told the public how they expect the Government to take steps to protect water sources, but the Environment Agency has also released a report 'Adapt or Die' in the last month about the huge risk that climate change is bringing to flooding. In light of all these statements how can they then agree to risks being taken with this source water? It raises the question, do the departments in the EA and AW that are raising these warnings know of the application, or are the EA and AW representatives at these hearings working separately. As yet, there has also been no adequate, complete public health investigation of the cumulative effect which drinking the polluted water 1980-2003 has had on the exposed population of Hatfield. There is some evidence of excess thyroid morbidity, and possible kidney disease (2007-2020) compared with others areas of comparable demography.

To reiterate our concerns, to put Hatfield's water supply at any risk in the future, seems to be a highly dangerous and negligent strategy.

## 5) Access to the Site, Air quality, and PM 2.5 pollution from the extra Lorries.

- a) We believe that there is a significant risk posed to **highway safety** at the entrance to the quarry site (by Notcutts). This site will have 164 HGV movements a day onto a single carriage road. To access the site HGVs will need to have a turning lane on the A1057 into the access road as all traffic must enter coming from the East. This is a busy road and slow HGVs queuing in this lane will cause the traffic to back up, it will only take two or three lorries waiting to completely block the road. This will raise the potential for accidents from vehicles coming across stationary traffic on a fast stretch of road or very slowly moving vehicles entering onto the roadway from the site, again into the path of fast moving vehicles. The placement of the entrance (**5m from where it was in the original application**) is in a **more dangerous position** than where it previously had been identified as it is now **closer to the blind bend**.

Weekday rush hours often has traffic queuing from the Albatross Way/Ellenbrook Lane Roundabout to A1057/Oaklands Lane/Station Road Roundabout. This is without the addition of **multiple HGVs which will be attempting to cross across a flow of traffic, on a bend in the road**. The applicant states that this piece of road is 'relatively straight', however they are omitting the fact that the entrance to the site is on a bend in the road, where by crossing across traffic, there are likely to be further delays to traffic between Hatfield and St Albans, as well as a potential risk to those cars travelling from St Albans to Hatfield, unexpectedly coming across an HGV crossing across their path. The A1057 is a road used daily by Hatfield residents, and students, often at peak times, and it is the only access and egress route for all vehicular traffic from the Ellenbrook estate. The real life, anecdotal evidence should not be ignored. There is photographic and video footage showing a typical queue of traffic between these two roundabouts. From this footage, you can also see the number of HGV type vehicles already on the road.

Any road works in the last few years have proved the theory that any disruption to the flow of traffic has a monumental impact, causing traffic in the morning at the Smallford roundabout to be queued

back to beyond the Ellenbrook roundabout, along Station Road down to the bridge and Oaklands Lane up to the roundabouts at Jersey Farm. The vehicles waiting to turn across traffic onto the site via the proposed access will be prevented from doing so by traffic coming from St Albans towards the Galleria and the A1. This will be aggravated by HGVs slowly pulling out of and away from the site onto the A1057 slowing the eastbound traffic. After the HGVs leave the A1057 at the Comet roundabout they will have to travel along urban roads to reach the A1(M), including several roundabouts and sets of traffic lights and some single carriage roads. This will further reduce the air quality in these areas of Hatfield.

- b) The Highways response that “it should be safe if all the ancient trees and hedgerow are removed” is unacceptable. Besides this being the worst action for air quality and climate change, this unacceptable destruction of the foliage will forever change the rural appearance of this street and area into a commercial zone as observed at the nearby Smallford Works.

The impact of extra diesel HGVs on the road, which is already congested, particularly at rush hour will contribute to dangerous PM2.5 and Nitrous oxide pollution, which is damaging to children’s lungs and the elderly especially when children are walking to Howe Dell School from the Ellenbrook estate, at this time.

- c) The silica dust, which will be produced in quarrying, is likely to affect students’ health. The new quarry site is right next to the UH sport field, and very close to the UH residences for 2000 students.

These public health hazards (from air pollution) can kill, and exacerbate coronary heart disease and respiratory disease including asthma, and will have a detrimental impact on the health of local residents. These have not been fully considered or discussed by the applicant.

Despite our **County councillor asking for an air quality meter** on this road there is **no recent traffic or air quality data yet** collected on this road which means that any information that is being used for decision making, is out of date and not reflective of the current reality. There will also be an increase in noise pollution which contributes to **poor mental health** and will negatively impact local residents.

## 6) Flooding

We believe that the authorities have not taken the following into account in regard to the potential for flooding:

**Climate change.** More weight should be given to this issue when calculating the risk factor for the quarry application.

- Climate change poses a real threat to flooding in our area, with extreme events occurring much more regularly than predicted
- The Ellenbrook area is regularly the subject of a flood risk warning highlighting this real risk to the area from flooding
- the ‘Adapt or die’ report recently published by the Environment Agency (EA)
- previous warnings from the Head of EA and Affinity Water regarding shortage of drinking water

**The cumulative impact from all the current, historic and proposed quarrying** in the immediate vicinity of this site turning permeable land into non-permeable land, altering the areas hydrology including increasing run off of large quantities of surface water along with the loss of open areas of land.

**Geographic location.** The proposed site is above Ellenbrook and parts of the university in terms of metres above sea level. The quarry site is up to 80m AOD, and flooding is shown to occur at 73m AOD including the A1057 roundabout and along the Ellen Brook.

**The use of the rivers to carry away excess water in extreme weather conditions** including overflows from the lagoons which will end up leaving the site and travelling through the residential area of Ellenbrook via the Ellen Brook, an open but confined stream which runs along Ellenbrook Lane and is already at full capacity during normal wet weather conditions.

**Too close.** Ellenbrook area is in a vulnerable position too close to the proposed lagoons.

- The risks of flooding to urban properties from the closeness of the Brett lagoons has been a great concern to local residents, particularly as the frequency of flooding has increased with climate change. Only 350m separate the University, roads, and local housing. The quarry and lagoons are too close to residential housing and poses a significant risk to them.
- These lagoons are man - made and subject to accidents, overflow, and blocking due to silt & algae.
- They are extremely deep, and carry vast amounts of water.

## Conclusion

The application is not sufficiently different from the 2016 application that was rejected by Hertfordshire County Council in September 2020, and the **four reasons for rejection are still valid**. The applicant has had time to review the concerns raised by the Council, and have had time to produce more up to date information and data to inform decision making, however none of these have been addressed to a satisfactory level.

More information has come to light about the underground bromate plume since the first, original application was submitted and should be taken seriously by the Council when making the decision. There are potential, serious consequences if the bromate plume is disturbed, and any risk is a risk too far. The appropriate governing/regulatory bodies have a **duty of care to the residents of Hatfield** and the community as a whole to ensure that our water sources are protected, and the bromate is **remediated more effectively** to protect Hertfordshire's future water supplies.

The County Council now has an opportunity to reconsider the cumulative impact on the area, potential for flooding, impact on the green belt and the risks associated with the plume **and to refuse this further application**. We ask the DCC not to put the public water source, and the health and well-being of Hatfield residents at risk and not to continue to subject Hatfield residents to another 30+ years of quarrying in this one, small area.

We also ask that a robust and proportionate review of the Hertfordshire Mineral plan is finally undertaken, with serious consideration of the quarry application made at Olive Farm, in East Herts, in place of the Ellenbrook quarry, in the interests of all Hertfordshire Council tax payers.

**Cllrs Margaret Eames-Petersen and Cllr Jackie Brennan**  
**For HTC**