

## **Ellenbrook Area Residents Association – Comments on Planning Application No 6/2018/2768/OUTLINE to build 1100 homes in Ellenbrook Country Park (to be known as Hatfield Green)**

This submission is on behalf of the Ellenbrook Area Residents Association. EARA represents over 500 dwellings in the area bounded by St Albans Road West, Wilkins Green Lane, Ellenbrook Lane, Comet Way and Ashbury Close. The submission has been approved by the Committee of EARA and was circulated to residents on the EARA mailing list to allow them to comment prior to submission.

### **Background**

In 1999 as part of the planning application for the former British Aerospace site, the aerodrome was split into four main areas for development. These included permission to create areas for:

- a Business Park
- an extension of the University of Hertfordshire into a second campus
- housing
- a country park (funded by a Section 106)

The four areas recognised the need to fill the employment gap left by the closure of British Aerospace; the need for the university to expand beyond its College Lane site; the requirement for housing in the borough and finally the recognition of the loss of a valuable green belt space in the area occupied by the aerodrome. The Supplementary Planning Guidance adopted by St Albans District Council and Welwyn Hatfield Borough Council in November 1999 confirmed the Ellenbrook Country Park in its Landscape Masterplan. Local residents involved in the consultations at the time believed that the Park was secured as a benefit to the local community and would be delivered.

The Business Park is nearing completion with the majority of the earmarked land occupied, the University has created a second campus, and the area allocated for housing has been developed creating 2000 dwellings. However although the Country Park exists in a raw state, it is virtually unchanged from when occupied by British Aerospace, the Section 106 money intended for the upkeep, maintenance and development of the Country Park from Arlingtons (the developers) has not yet materialised nor has the Trust itself been set up.

Despite the creation of the country park clearly being recognised as an important amenity for local residents and one that was assured under a legal agreement as part of the original planning permission, the landowners Arlingtons have now twice attempted to release a section of the land promised to local residents for a country park, to build houses for financial gain. The first proposal was part of the Local Plan for the site known as Hat 2 (1100 houses). This was rejected by WHBC due to the number of sites concentrated in the area and the fact that it took a significant part of the country park away. Arlington have now submitted this second application, known as Hatfield Green, to again create 1100 houses in the same area as the rejected Hat 2.

Ellenbrook Area Residents Association objects to the Hatfield Green proposal on the following grounds.

### New planning application for Hatfield Green

This new planning application covers a very large area comprising of 67.5 hectares (the size of 94 football pitches!). This is approx 40% of the total country park area consisting of circa 172 hectares. If you combine this with the gravel extraction area of 86.6 hectares, a total of 154.1 hectares will be affected by the quarry and Hatfield Green developments totalling just under 90% of the total area. This means that only 10% of the current country park will be left for residents to enjoy. During the gravel extraction a minimum of 40% of the 86.6 hectares will be inaccessible whilst gravel extraction and remedial work is undertaken. However it has been indicated by WHBC that a larger percentage of the site is likely to be unavailable to the public for health and safety reasons. This means that 40% of the park will be permanently lost to housing and a large proportion of the remainder will not be accessible over the next 32 years. This is not in the spirit of the original agreement and associated planning permission previously approved.

The map below (taken from the Hatfield Green outline planning application document) illustrates the huge area of Ellenbrook Country Park that will be given over to the housing development and the gravel extraction leaving a very small park for residents, which will be virtually inaccessible from St Albans Road West



Original Masterplan Concept (extract from 'Hatfield Green - Forest Village Concept' brochure)

## Original planning application

At the time of the original 1999 planning application the council allocated part of the aerodrome site to become a country park for the use of all residents under a legal agreement (Section 106). The principle that the original decision was based on still remains and nothing has changed that should alter that decision. The delays in setting up the Section 106 to manage the country park are unacceptable, and cannot be a reason to allow Arlingtons the opportunity to take part of the land allocated for the park to become a housing site. The designated housing area, allocated to Arlingtons, to the east of the new proposal, has been fully completed providing 2000 homes. The Section 106 agreement granted as part of the original application should not be reneged upon.

## Volume of housing within Hatfield

EARA remain concerned at the reliance on the Hatfield Villages ward to deliver a high proportion of the housing growth for the borough.

Circa 2000 homes have already been built on the aerodrome site as part of the original 1999 planning application.

As part of the Local Plan a further 1650 homes are proposed for Hat 1 (Stanboroughbury), 1130 homes for Symonshyde (Hat 15) and 10 homes on the Furzefield site.

Other local increases include the Comet Hotel which is being redeveloped and expanded to provide accommodation for 300 more students.

In summary the total growth in homes concentrated in this area since 2000 would potentially be 6250, broken down as follows:

2000	Salisbury Village (already built)
1650	Stanboroughbury
1130	Symonshyde
10	Furzefield
360	Comet Hotel
<u>1100</u>	<u>Hatfield Green</u>
<b>6250</b>	<b>Total</b>

The 1100 homes proposed for the Hatfield Green application is unlikely to provide any benefit for the area.

## Gravel

As part of the planning application, for the former aerodrome site, outline permission was granted for gravel extraction. Although final permission has not yet been approved, permission has been granted subject to various conditions. Therefore it is likely that a considerable proportion of the Country Park will be unavailable for resident's use whilst gravel extraction takes place, across a time period in the region of 32 years. To take an additional section of the remaining park for a housing site will leave virtually no area for residents to use. See map on page 7.

## **Traffic**

The following housing developments have been approved as part of the Local Plan and will add a significant volume of traffic to the local area network

Hat 1 Stanboroughbury 1650 homes  
Hat 15 Symonshyde, 1130 homes  
Furzefield, 10 homes

This will be in addition to the redevelopment of the Comet Hotel providing 361 bed accommodation for students, plus a 99 bed hotel with gym and very little onsite parking.

The proposed quarry gravel extraction on Ellenbrook Country Park will also bring a significant increase in lorries along the A1057 St Albans Road West amounting to an extra 178 lorry movements per day

Recent developments on the business park have also increased the traffic including the development of Arla, Land Rover/ Jaguar and McClaren/Aston Martin, Air Business

The following developments outside of the borough have either recently occurred or are in progress and will also feed into the same road network

Glinwell Nurseries expansion and new farm shop  
Sandpit Lane housing development (over 1000 homes)  
Ellenbrook Meadows housing development (28 homes)  
Pearce recycling expansion  
Beaumont School site housing development (75 homes)  
Cemex gravel extraction expansion 250 lorries per day

The volume of recent, current, and proposed new developments for the area will place an intolerable burden on the road network, using the single carriageway roads between St Albans and Hatfield along Sandpit Lane, Coopers Green Lane, Hatfield Garden Village, St Albans Road West and Hatfield Road. A number of these roads are country lanes and are narrow, winding and dangerous. To increase this burden by a further 1100 homes on the new Hatfield Green application is unacceptable and we are not satisfied that the cumulative effect of all these projects on the already strained road infrastructure has been taken into account as part of the planning application.

## **Green Belt**

At the time of the original planning permission in 1999 it was made clear that as part of the overall development of the aerodrome site no further expansion towards St Albans should occur, the boundary of the Business Park should be the red line. Should the quarry go ahead then this will leave us with next to no green belt and open space and no green barrier between St Albans, Hatfield, WGC and Stanborough. There is no reason why this principle as set out clearly in the original permission for development should be ignored, overwritten and not complied with.

## **Flooding**

Historically the whole site has a flood problem, with the land sloping towards the South East, i.e. towards the Ellenbrook area, the highest point being @ 80m ASL (Above Sea Level).

The only river carrying this water is the Ellenbrook; it rises at Astwick Manor flowing in a southerly direction, through balancing ponds then under the A1057 roundabout (74m ASL) to meet the river Colne. The area along its banks is already classified as a flood risk. The development will increase the risk of flooding with extra rainfall run-off and drainage.

Two huge lagoons are sited too high up and too close to urban housing and the University. This poses a potential flooding threat to anything downstream on the Ellenbrook and Nast river streams, these low-lying areas are already designated Flood Zone 1 status. The Nast becomes a discharge point for these lagoons.

The cumulative effect of the new development at Hatfield Green and the proposed quarry will contribute to flooding in low lying areas near the University, A1057 roundabout, and along the Ellenbrook river - this will occur because the stripped vegetation that normally absorbs surface water will be removed. The act of concreting over such a large area of land for housing and therefore reducing significantly the permeable area available will only exacerbate this issue and put the area at a greater risk of flooding. Surface rainwater and drainage from housing will eventually find its way into the Ellenbrook river system and potentially cause flooding in the Ellenbrook area.

## **Pollution**

The proposed site Hatfield Green crosses one of the highest levels of bromate contamination in Europe. Levels in excess of 1000µg/l have been detected by the Environmental Agency (EA). This contamination to the Aquifer (water bearing chalk) means that water from wells or any water from the Aquifer must not be consumed. The maximum level set by the World Health Organisation is 10µg/l.

Any building to a depth nearing the Aquifer may cause cross contamination to surface water and spread the contamination in different directions.

The issue of potential contamination by the bromate plume was highlighted in investigations into the applicant's prior submission to quarry the remaining section of Ellenbrook Country Park. The current position as described to us with the quarry application is that Arlington's representatives Brett Aggregates are now working with Affinity Water to come up with a solution that will not affect the flow direction and put in safeguards to monitor the contamination. We understand that the consensus between these two organisations is that amongst other safeguards there should be alarms fitted to monitor the height of the water table and if it reaches an agreed level all works must stop.

The impact of the lower water table breaching a certain height is catastrophic, as it will contaminate the upper water course which is the source for our drinking water. This application will undoubtedly affect the height of the water table over the entire site. As it sits directly over the bromate plume, in our opinion it cannot be left to chance that the combined effects of both these developments will not affect the bromate plume and risk cross contaminating the water tables. The bromate has already affected and therefore closed the Hatfield bore hole and has affected the Essendon bore hole, which is monitored closely and as we understand is shut down occasionally when the level of bromate breaches World Health Organisation guidelines. This is a real issue being treated very seriously by Affinity Water as it could affect their ability to supply us all with drinking water.

As residents we therefore remain concerned about the impact of any development on Ellenbrook Country Park that may jeopardise our drinking water. Once the water is contaminated then it is too late as it is almost impossible to eradicate the bromate in the water once contaminated.

Numerous planning documents have been submitted by Arlingtons in support of their application. These include a report from Baynham Meikle Partnership Ltd into the Ground Conditions, Hydrogeology & Contamination to the land. In this report it explicitly states:

*Contamination*

*1.15 No significant sources of contamination or ground gases have been identified, however, made ground may be present across the site, particularly in areas of previous development.*

*1.16 Groundwater has been encountered at depths of between 5.0m and 12.80m bgl, and during sampling, did not show any signs of contamination such as odour or sheen.*

This report is completely inaccurate and does not mention the bromate plume which Arlington is fully aware of as the plume is one of the causes of the delays in obtaining full planning permission for the quarry. This report by external consultants is disappointing and does not in our opinion outline and reflect the risk and issues on the proposed development site and the potential impact on residents.

The Environment Agency has submitted the following comments in respect to another planning application on the Country Park to build an airfield. I quote:

*The proposed site overlies groundwater that is polluted with bromate and bromide. The adjacent, existing CEMEX Hatfield quarry and proposed Bretts 'Ellenbrook' quarry (aka Hatfield Aerodrome quarry) are both required to closely monitor groundwater level and groundwater quality in order to demonstrate that their activities do not significantly change the existing groundwater flow regime, which might cause the groundwater plume of bromate and bromide to move. Any proposed use for this site must demonstrate the same, in proportion to the activities.*

Borehole readings taken by the Environment Agency during 2017 clearly show readings up to 1020µg/l.

This is unequivocal evidence from the Environment Agency – the public body that is responsible for protecting our environment – clearly stating the risk of the bromate being disturbed.

The map below shows the known contamination on Ellenbrook Field and Hatfield Green. The area around Frobisher Way cuts across the application site with bromate contamination in the Aquifer in excess of 1000µg/l



## Summary

In summary EARA objects to any further development on the Ellenbrook Country Park based on:

- the loss of the vast majority of the open space for residents as promised in the 1999 planning permission; the country park is a vital part of the community, supporting the health and well-being of the residents of Hatfield.
- the excessive concentration of housing development in the Hatfield Garden Villages area
- the impact caused by the increase in housing and the cumulative effect of all the many developments in the local area on the traffic congestion which is already a significant issue in this area
- the increase in noise and air pollution which is detrimental to the health and well being of local residents and frequenters of the area
- the potential risk to our drinking water caused by development on a site where bromate is present
- the renege on the Section 106 agreement as part of the planning permission for the creation of the Country Park for local residents