

**Director of Environment and
Infrastructure: Mark Kemp**



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Telephone : 01992 556275
Contact : Emma Chapman
My ref : SPEU/EC
Your ref : 6/2018/2768/OUTLINE
Date : 10/12/2018

Dear Mr Gerry Ansell

Location: Hatfield Business Park Hatfield AL10 9SL

Proposal: Outline application for a large-scale mixed use development including 1,100 new homes and supporting infrastructure including a primary school, local centre and open space with all matters reserved

Application No: 6/2018/2768/OUTLINE

I am writing in response to the above planning application on behalf of Hertfordshire County Council, as the Minerals and Waste Planning Authority.

Minerals

Extant Policy

The area which the proposed development covers falls within the boundary of Preferred Area 1 Land at BAe, as identified in the adopted Minerals Local Plan 2002-2016 (adopted March 2007).

Preferred Area 1 is one of three Preferred Areas identified in the adopted Minerals Local Plan. The Preferred Areas of the adopted Minerals Local Plan are identified as favoured locations to provide the county with opportunities for the working of sand and gravel over the plan period (2002-2016) and remains extant policy until the adoption of the emerging minerals Local Plan (which is anticipated for Summer 2020). The Preferred Areas are supported by adopted Minerals Policy 3: Sites for sand and gravel extraction and the working of Preferred Areas.

As the Borough Council is aware, the area which the proposed development covers is known to be affected by the bromate (and bromide) plume. Although the mineral in this part of the Preferred Area (i.e the area which the proposed developments

cover) may be considered to have reduced overall viability, the mineral deposits in the remaining part of Preferred Area 1 are considered to be of a workable quality.

These development proposals could therefore jeopardise the remainder of Preferred Area 1 from being worked. The close proximity of the residential developments could cause the sterilisation of the remaining mineral resources.

There is currently a planning application for sand and gravel extraction which falls at the remaining part of Preferred Area 1. Please see the 'Negotiations of new S106' subheading for more details.

To view the boundary of Preferred Area 1 of the adopted Minerals Local Plan, please follow the link below and go to 'Map 06 Hatfield'.

<https://www.hertfordshire.gov.uk/services/recycling-waste-and-environment/planning-in-hertfordshire/minerals-and-waste-planning/minerals-planning/minerals-planning.aspx>

Existing Section 106 (S106)

There is an existing S106 which covers the whole of Preferred Area 1 (of the adopted Minerals Local Plan 2007) and the wider area to the east. The S106 seeks to deliver Ellenbrook Park. Ellenbrook Park is set to include formal and informal public recreation uses, landscape and wildlife resources and will allow free public use enjoyment and access at all times.

The proposal to build housing on part of the area set to deliver Ellenbrook Park would therefore be in contravention to the existing S106.

Negotiations of new S106

As the Borough Council is also aware, there is a planning application for mineral extraction ('Land at Hatfield Aerodrome') at the remainder of Preferred Area 1 which adjoins the boundary of the proposed developments at Hatfield Business Park. This planning application has a resolution to grant planning permission subject to the signing of a new S106 agreement.

Negotiations are also ongoing regarding the need to vary the existing S106 (which covers Preferred Area 1 and the wider area) so that the worked area will be restored to a condition which would enable the delivery of Ellenbrook Park. The wish to deliver Ellenbrook Park remains the intention of the Borough Council, St Albans District Council and Hertfordshire County Council.

The delivery of the proposed developments at Hatfield Business Park could jeopardise the delivery of the sand and gravel extraction at 'Land at Hatfield Aerodrome' (i.e the remaining part of Preferred Area 1 which the proposed developments do not cover) and the subsequent delivery of Ellenbrook Park.

Emerging Policy

As the Borough Council is aware, the emerging Minerals Local Plan identifies Hatfield Aerodrome as a Specific Site (Specific Site 1). Specific Site 1 is currently subject to the 'Land at Hatfield Aerodrome' application.

Specific Sites are identified in the emerging Minerals Local Plan as sites which are expected to contribute to meeting aggregates demand over the period of the plan (which is set to be 2016-2031).

'Land at Hatfield Aerodrome' is set to deliver approximately 8 Million Tonnes of sand and gravel and therefore contributes significantly to the amount of sand and gravel planned for over the emerging Minerals Local Plan period (2016-2031). Taking this into account, the delivery of the proposed developments at Hatfield Business Park and their potential to sterilise the remaining mineral resources in the adjoining area (i.e the remainder of Preferred Area 1 which is currently subject to the 'Land at Hatfield Aerodrome' application), could jeopardise the identification of this site (i.e Specific Site 1: Hatfield Aerodrome) within emerging Minerals Local Plan.

Waste

The eastern boundary of the proposed development adjoins Employment Land Area of Search (ELAS) 044 Hatfield Aerodrome, as identified in the Waste Site Allocations Development Plan Document 2011-2026 (adopted July 2014). ELAS are identified in the Waste Local Plan as suitable areas which may be compatible with waste management uses. The Borough Council should take into consideration the possibility of a waste management facility being located at ELAS 044 in future, throughout the remainder of the life of the Waste Local Plan (i.e up to 2026).

Conclusion

The proposed development falls within the east/north east part of Preferred Area 1 of the adopted Minerals Local Plan. The developments have the potential to sterilise the mineral resources in the adjoining, remaining area of Preferred Area 1, which currently has a resolution to grant planning permission for the extraction of sand and gravel (planning application referred to as 'Land at Hatfield Aerodrome'), subject to the signing of a S106 agreement.

In addition to having the potential to sterilise workable mineral resources, the development proposal also has the potential to prevent the delivery of Ellenbrook Park.

The remaining part of Preferred Area 1 has been identified as a Specific Site in the emerging Minerals Local Plan (Specific Site 1: Hatfield Aerodrome). As explained above, the planning application at Specific Site 1 'Hatfield Aerodrome' currently has a resolution to grant planning subject to the signing of a S106 agreement. 'Land at Hatfield Aerodrome' is set to deliver a significant amount of sand and gravel required for delivery over the period of the emerging Minerals Local Plan.

Taking all of the above into account, the county council, as the Minerals Planning Authority, strongly objects to this application (6/2018/2768/OUTLINE).

Yours sincerely

A handwritten signature in black ink, appearing to read 'Emma Chapman', written in a cursive style.

Emma Chapman

Planning Assistant – Minerals and Waste Policy