

## **Ellenbrook Area Residents Association – Comments on Planning Application No 6/2018/2768/OUTLINE to build 1100 homes in Ellenbrook Fields (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.

### **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. Arlingtons have now submitted this second application, known as Hatfield Green, to again create 1100 houses in the same area as the rejected Hat 2.

Since the initial application for this housing development, the quarry application intended for the other half of Ellenbrook Fields has been subject to a number of hearings at HCC's DCC and at the hearing on 18 December 2019 Arlingtons stated they would be able to complete on the Trust and agreed to pay the funds within 8 weeks. One year on and there is still no sign of the Trust. This is an unacceptable position.

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

**Size of the development**

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. Although the planning application for the quarry was refused in September 2020, the applicants are likely to appeal the decision. So residents will lose either 40% of Ellenbrook Fields or 90% if the quarry appeal is successful. Either way the loss of any of the green belt will be at huge cost to residents. This is particularly relevant during the COVID pandemic where Ellenbrook Fields has proved to be a vital amenity for local residents to safely exercise.

Any loss of the green belt in this location is not in the spirit of the original agreement and associated planning permission previously approved in 1999 for the redevelopment of the Hatfield Aerodrome.

The map below (taken from the Hatfield Green outline planning application document) illustrates the huge area of Ellenbrook Fields that will be given over to the housing development and if the quarry appeal is successful there will only be 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)

## **Compliance with the 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 (as referred to above) 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 original designated housing area, Salisbury Village, 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.

## **The Local Plan and 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. The Local Plan has been so long in development and delivery that it is easy to forget the huge volume of housing that has already been built on or around the old Aerodrome site.

This amounts to circa 2000 homes on the actual site as part of the original 1999 planning application, a further 300 students homes on the Comet hotel site, and 28 homes on Ellenbrook Meadows.

The Local Plan was reviewed in 2016 and 2019 and the area on Ellenbrook Fields known as Hat2 has consistently been rejected. Despite this Arlingtons still continue to attempt to renege on the original planning agreement for the site.

The Local Plan still has not been finally agreed, but it includes a number of sites very close to the Aerodrome site. Therefore there will still be a significant volume of additional housing being built in this part of the borough. Planning consent has already been approved for gravel extraction on Hat1 prior to the site development.

1650 homes are proposed for Hat 1 (Stanboroughbury) and 10 homes on the Furze field site.

Although Symonshyde was included in the 2016 plan and rejected in 2019, it now potentially may be included with an increase in size.

In summary the total growth in homes concentrated in this area since 1999 will already exceed 4000 homes, with a further 1500 potentially at Symonshyde.

In addition to this the St Albans Oaklands development of over 1000 houses, Jove Gardens and the Radio Nursery Site have already added more development and loss of green belt in the surrounding area.

## **The impact on traffic in the area**

As mentioned above there a significant number of housing developments planned and proposed. These will add a significant volume of traffic to an already congested local area network

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)  
Radio nursery site  
Cemex gravel extraction expansion 250 lorries per day

Developments on the business park have also increased the traffic including the development of Arla, Land Rover/ Jaguar and McClaren/Aston Martin, Air Business, One Hatfield hospital

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.

EARA believe that the Transport assessment addendum submitted 7.01.2021 for this application is completely flawed.

This report suggests a mere 150 – 200 additional journeys a day in the morning on the northern route and same on southern route and likewise numbers in the evening. We would suggest that these figures are totally flawed based on if you take each of the 1100 dwellings has an average of 2 vehicles that is a potential of 2200 additional vehicle movements each morning and evening pm. If a conservative estimate of only one vehicle from each of the dwelling leaves the site this would be circa 1100 movements twice a day, considerably more than the report predicts.

The report accepts that Coopers Green lane has a number of pinch points that cannot be remedied, and therefore not possible to be used for pedestrian and cyclists provision, so their response is to push pedestrian and cycle movements down Albatross Way across the busy A1057 up Ellenbrook Lane and onto the Alban Way.

This has not dealt with a number of issues such as:-

- Human nature is to take the shortest, most convenient route not the one directed by developers or planners
- A large amount of pedestrians and cyclists attempting to cross a very busy junction that already exceeds its traffic capacity at peak times will cause lengthy delays as vehicles will be stopped continuously to allow pedestrians and cyclists to cross thus increasing journey times and air pollution from additional and standing traffic.
- Ellenbrook Lane is the main vehicle and pedestrian access and egress point for the 500 + dwellings. It is a dangerous road already due its narrowness and bends with a very narrow pathway which is insufficient for the existing footfall with no provision for cyclists to ride other than on the road
- Alterations to Ellenbrook Lane are not possible without detrimentally altering its semi-rural appearance and turning a local road into a cut through affecting both the local residents and destroying the current community feel to this area.

## The loss of Green Belt

At the time of the original planning permission in 1999 it was made clear, and emphasised by the Planning Inspector, 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 development go ahead then this will considerably reduce the green belt and open space and shrink the 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.

## The Flooding Risk

EARA are extremely concerned about the flood risk on the site. Whilst the majority of this area may be designated low flood risk, a proportion is classified as high risk for both groundwater and river flooding, it is clear from the photos below there is a significant flood issue that can only become exacerbated by this development. Flooding at the location below on the actual development site is a common occurrence. To suggest that flooding will not be a problem when huge areas of permeable land will be replaced by housing in an area already blighted with flooding is absurd.

## Photos of the start of the taxiway, taken in different years including 2021



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 new development at Hatfield Green 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.

### **Photos of the Ellenbrook Recreation Area, near to Ellenbrook, taken in different years including 2021**



The proposed mitigation to reduce the risk that this development poses to the bromate pollution plume involves moving the groundwater runoff towards the southern edge of the site. This effectively further increases the risk of flooding in this area.

### **The Bromate Plume**

The application site is over an area which is contaminated by a bromate plume. It has finally been acknowledged and recognised that the bromate plume presents a huge risk to the source of our drinking water and that despite 10 years of remediation actions by the Environment Agency it is proving extremely difficult to manage, in fact the plume has not been reduced at all and a new remediation plan is being proposed to try and manage the worst bromate pollution event ever seen in Europe.

For these reasons we believe that a ZERO risk strategy should be adopted for the plume and any activities which could disturb the plume should not be allowed on or near the path of the plume. The risk of diverting the plume path towards any water source should not be taken.

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 disturbance to the ground near the polluted aquifer may spread the contamination in different directions affecting and polluting the groundwater which will be catastrophic. This 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.

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 development can only raise the risks to local groundwater pumping stations becoming contaminated.

The Environment Agency have placed an objection to this application because “the risks to groundwater from the proposed development are unacceptable”. These risks include the bromate and bromide pollution under the site and the potential contamination due to the previous use as a commercial and military aerodrome.

These issues are clearly recognised by the expert body and as mentioned above we believe that a ZERO risk strategy must be adopted for this regardless of any mitigating actions the developers may choose to adopt or implement, none of which will give a 100% guarantee.

As residents we therefore remain concerned about the impact of any development on Ellenbrook Fields that may further jeopardise the source of our drinking water. Once the water is contaminated then it is too late.

The map below shows the known contamination on Ellenbrook Fields and Hatfield Green with contamination in excess of  $1000\mu\text{g/l}$ . **One hundred times the World Health Organisation limit.**



### Impact on the veteran trees on the site

It is really important to provide protection for veteran trees that have been identified on the site. The absence of a tree survey does not appear to provide the necessary protection required to preserve these habitats.

## **Impact on local resources**

EARA note that a number of statutory consultees have responded to the application raising concerns, and whilst the proposal includes the provision of a primary school, we believe that this application will have a significant impact on the provision of other local resources as confirmed by the statutory consultees. It is unclear where the additional budget would come from to provide the additional resources required.

## **Police**

The response from the police states “Project would require significant increase in police numbers and planning for Airfield development has been poor in crime prevention”. The police raise concerns that there are already high incidences of crime in the area and that there are insufficient resources available to deal with the increase in activity.

## **NHS**

NHS England have requested a contribution of £1m+ to cover the additional costs. If the development goes ahead the impact on primary healthcare provision, if unmitigated, would be unsustainable. Their support for the development is dependent on S106 monies being available, without this they do not believe that the development is sustainable.

## **Education**

The development proposes one primary school, however the response from HCC Growth and Infrastructure Unit clearly states that the following would be required.

- Nursery and childcare provision as part of the primary school
- Secondary school (two form entry)
- Financial contribution towards youth services
- Financial contribution towards library services
- Consideration of needs of adult care and special needs groups

Clearly there would appear to be considerable gap between the proposal of a primary school and the other extensive requirements above that a large scale development would bring.

EARA are concerned about the resulting impact on the already stretched local service delivery and budgets. The developers have a poor history for compliance with Section 106 orders including the failure to provide the country park, setting up of the Trust and the transfer of funds over the past 20 years.

## **Summary**

In summary EARA objects to any further development on Ellenbrook Fields based on:

- The loss of a large part 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 site is not included in the emerging Local Plan
- The site is within Green Belt and designated to remain as Green Belt in the emerging Local Plan, the green belt review concluded that this area contributed a significant amount to preventing coalescence of Hatfield and St Albans and safeguarding the countryside
- 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, very serious risk to the source of our drinking water caused by development on a site where bromate is present, potentially causing a reduction in locally available water resources
- The reneging on the Section 106 agreement as part of the planning permission for the creation of the Country Park for local residents
- The negative impact on an already stretched infrastructure and resources including the police, NHS and education provision