

Opposition to

**Brett Aggregates Ltd Planning Application for The Establishment of a new Quarry,
new Access, Aggregates Processing Plant, Concrete Batching Plant and other Ancillary
Facilities, together with the Importation of Inert Fill Materials**

Smallford/Hatfield Aerodrome Site off Hatfield Road, Hertfordshire

Application PL\0755\16 & 5/0394-16

Grid Ref: 519837, 208389

Report BA1 conducted by Dr Rajiv Kaila 10th February 2016

Member of Smallford Residents Association, St Albans, Hertfordshire, UK

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<http://www.smallford.org>

Background

Brett Aggregates has submitted a planning application to Hertfordshire County Council in February 2016 to build a quarry on up to 87 hectares of green belt land owned by the Goodman Group at Smallford/Hatfield Aerodrome in St Albans for operations for 32 years. Placing this size into context (**Figures 1, 8**), this large area of 870,000 square meters represents a size 2.5 greater than the proposed site for a Rail Freight terminal in nearby Radlett (330,000 square meters) which was recently refused after a Secretary of State appeal in 2015.

This whole site is land contained by Ellenbrook Nature Park. The area is surrounded by local village communities of Smallford, Ellenbrook and is within a Green Belt area in the East of St Albans and crosses the district boundary to Hatfield. It consists of land with Ancient Woods, rich wildlife habitats at pools of water and grassland, Ellenbrook Tree Reserve area and recreational land and an area in which a National Grid gas pipeline runs. The area is used daily for recreation by walkers, ramblers and those that enjoy wildlife e.g. bird and deer watchers, including members of the Hertfordshire and Middlesex Wildlife Trusts and RSPB. There is no doubt that the application for construction of an 87 hectare quarry that will be operating for a considerable 32 year timeframe will greatly adversely affect the local environment, Green belt, wildlife, habitats, available recreational land, road traffic and infrastructure, noise and air pollution and the community. Local residents are very concerned about the impact of this plan. The plans are an industrial works on a huge scale not seen previously in St Albans.

The area is also of historical importance because St Albans is a Roman settlement. A Study by English Heritage on behalf of Hertfordshire County Council in 2005, who paid £5442 for the study (1), identified the Paleolithic (Stone Age) settlements and likely archaeological remains from the Bronze Age 10,000 years ago to the Medieval age.

More recently the site has historic importance in the 20th Century due to the runway that lay in the site from the De Havilland airfield that was important during World War 2 and in the development of important aircraft, including the Comet, the first commercial jet aeroplane in the world.

This document outlines issues with the application, significant errors, the sensitivity and importance of the site and reasons why the application should not pass.

Environment

As of yet there has not been an independent evaluation of the wildlife, the habitats, movements of animals or biodiversity and benefit of the land in its current state. However, Brett Aggregates who are submitting application to build a quarry on the site have commissioned SLR Consulting to make an initial evaluation in the form of a scoping document in June 2015 (2). This has only heightened the knowledge of the importance of the site for its rich wildlife, habitats, biodiversity and recreational benefits. There are, 'great crested newts and other protected species in locations affected by the proposals' ((2) Table p24) on the proposed site and adjacent to it. Adjacent to the site at Cut Field ancient wood there have been other initial ecological surveys which have identified populations of Great Crested Newts, 'which are potentially under threat' ((3) 5.5.5 p27). The SLR scoping report indicated that only 'baseline ecological surveys commenced in autumn 2014' (2) had been undertaken and hence more wildlife and environmental benefits of the site may be identified if further impartial assessments are made over adequate timeframes. Species of importance include 'short-eared owls which have historically used the site', with identified barn owls, snipe, stonechat and woodcock, cuckoo and passage wheatear. They mentioned that 'further targeted work on the habitats of somewhat more interest is programmed but there has been no evidence or results of these produced. It is important that communication is made with SLR to identify important habitats and question why no further information has been sought. SLR's document mentioned that they expected common reptiles to be identified and that Great crested newts were already 'identified in 5 of 10 ponds being surveyed'. There is no mention of the results of invertebrate surveys, bat surveys or on badgers.

Other animals that may be on the site, but not formally assessed yet include Brown Hare, Badgers, Sky Larks, Song Thrushes, Song Thrush, Meadow Pipit, Barn Owls, pheasant, Roa and Muntjac deer. Foxes, pheasants and Muntjac deer travel the site and enter the gardens of residents on Oaklands Lane regularly (**Figure 9**), indicating they cross the site over a long distance. Consequently, the effect on non-endangered species and their habitats and their movements need to be fully and impartially evaluated.

No work has become evident in searches that have looked at the wildlife, habitats, movements of animals or biodiversity and benefit of the land in its current state at the ancient woods neighbouring the site. An impartial full assessment needs to be undertaken and should include this too. An adjacent quarry is likely to detrimentally affect that area greatly. As Brett Aggregates intends the land to be quarried for 32 years wildlife, habitats and biodiversity within and adjacent to the site will be adversely affected with loss of endangered and non-endangered species and prevent those who enjoy the land in viewing them or by walking the land for future generations. This impact needs to be taken seriously.

As part of the deal with Goodman Group (the current land owner) developing the adjacent site to construct the Hatfield Business park, which they also own, Ellenbrook Tree Reserve was planted on site in 2010 (**Figure 2**). This was for the purpose of recreational use by local residents of adjacent St Albans/Smallford and Hatfield. Current access to the site from the west at Oaklands lane is only from footpaths/bridleways at the entrance of Notcutts nursery. The building of a quarry on the site will remove the tree reserve and access/recreational use of the area. The details from Brett Aggregates plans indicate access, from this west point from where residents, walkers and ramblers enter the area from Oaklands Lane/Hatfield Road will be removed along with all the green and un-built upon land.

The site has been used by the Mid Hertfordshire local group of the Hertfordshire and Middlesex Wildlife Trusts. It is acknowledged that as well as viewing the varied wildlife they have used it to observe Barn Owls (4). It is also used by the St Albans Local Group of the RSPB who documented a visit in 2013 with sighting including red kite, sparrowhawks, kestrel, skylarks, woodpeckers and whitethroat, treecreeper and amandarin (5) and have a planned visit in January 2016 (6).

As a recreational site there are Bridleways and a Public Footpath that traverses from the whole length of the site from west at the Notcutts Garden Centre entrance to east and south to north across the site. Lack of access will mean that the site cannot be enjoyed for its wildlife. With a busy, dangerous working quarry it will not be possible for residents, public, rammers or those wishing to view any remaining wildlife or aviation history/archaeology to walk across the site and these features would be permanently removed. It will not be possible or safe to use the paths/bridleways due to the quarry, work being conducted, heavy machinery on site, several processing mineral conveyor belt systems, with one proposed to be almost 1km in length, and due to the HGV vehicles proposed by the applicant to distribute the minerals from the adjacent Hatfield Road. Due to the lack of access and removal of bridleways that have remained on maps for centuries it will not be possible to cross the site from the Oaklands lane side from the west to the wood or Great crested newt pools at the north/east.

The Hertfordshire Mineral Local Plan Review 2007 ((7) p77) indicated that Bromate contamination is on the site and may impact upon the Three Valleys water source at the public water source at Bishops Rise. This has not been addressed by the applicant.

Ellenbrook Nature Reserve/Ellenbrook Fields

The adverse effects on wildlife, recreational use and green belt damage in the Brett Aggregates proposals for a quarry conflict with the Goodman Group's initial proposals for the land that was agreed by Welwyn/Hatfield Borough Council, St Albans City and District Council, Hatfield Town Council and Colney Heath Parish Council to be preserved in Ellenbrook Park Preservation Trust (**Figures 2, 3**). It is astonishing that residents of the whole of St Albans and Hatfield have not been informed clearly in this application that the changes will result in complete loss of this Ellenbrook Nature Reserve which has been shown as important to local residents in consultations and in the St Albans City and District Council Local Plan Draft 2016 (**8** p100).

In 2010 the whole site, now being proposed by Brett Aggregates to build a quarry upon, was previously secured by Welwyn/Hatfield Borough Council, St Albans City by a 106 agreement (**8**) as green space when the Goodman Group were given the permission to build the Hatfield Business park. It is improper that the Brett Aggregates submission does not highlight that this land is intended as green space initially for the benefit of residents of St Albans and Hatfield. Many will still be unaware of the loss of their recreational site as they have not been involved in any consultation processes up until the application by Brett Aggregates. They may feel the land is of no use to locals but the site serves important purposes. It provides a rich wildlife base as noted above, it provides recreational use for residents of St Albans and Hatfield and visitors. It is Green Belt land that also serves as a boundary with the District Boundaries of St Albans and Hatfield with the district boundary running vertically through approximately the half way point of the site. As part of the Green Belt land it has important use to prevent urban sprawl as per Green Belt purposes (**8, 9, 10, 11**). The site is also named as Ellenbrook Fields at which Brett Aggregates are planning for an operational quarry for 32 years. However, as indicated on the St Albans City & District website (**12**), this land was intended for use 'for the public to enjoy', with 'park land with footpaths, hay meadows, a bridleway and woodland' and 'approximately half of the remaining park land will then be used for cattle grazing with Longhorn Cows'. At the South-West corner of the land towards Notcutts Garden Centre and Hatfield Road there has been much in the way of newly planted trees (**Figures 6, 7**) since 2010 which will also be lost if the Quarry plan proceeds.

The intended use was also reported by the HertsAdvertiser newspaper (**13**) (**Figures 3**) on Thursday February 3rd 2011 and Welwyn Hatfield Times on 8th December 2010 (**14**). As indicated by local councillor of Colney Heath Parish Council and the St Albans City & District website (**12**) and the Welwyn Hatfield Times on 8th December 2010 (**14**), the land was to be handed over by the owner/developer Goodman Group to 'the Ellenbrook Park Preservation Trust which will be made up of representatives from Welwyn/Hatfield Borough Council, St Albans City and District Council, Hatfield Town Council and Colney Heath Parish Council as well as Goodman'. This Preservation Trust was to have a key role in its function, role and future.

The land is also subject to a 106 agreement which designated it Ellenbrook Fields. The St Albans Strategic Local Plan draft 2016 3.9 ((**8**) p18) mentions the site as an important area to protect). Section 10.17 ((**8**) p100) indicates that this Ellenbrook Country Park is being delivered primarily by a Section 106 agreement and involves cross boundary co-operation between St Albans City and District Council and Welwyn & Hatfield Council. Section 10.21 Policy SLP27 (**8**) indicates St Albans City and District Council's desire for the country park.

Hertfordshire Green Infrastructure plan recognised the importance of this land for nature conservation ((9) 2.54 p28).

The Goodman Group released documents indicating the site's use and confirms the majority of the land will be lost to a quarry. The boundary of the proposed Brett Aggregates quarry encompasses the majority of this area and not solely the Ellenbrook Tree reserve area to the North-East (15) (16) (Figures 2, 3).

The site has been identified in 2011 as an area serving 'key opportunities for habitat improvements, restoration and enhancements in Hertfordshire, drawing from the analysis as follows: Promotion of community forestry, expressing the aspirations of the WCCF Plan' (2.54 p28 Hertfordshire Strategic green Infrastructure Plan (9)

With the loss of potential benefits of this green space a full inquiry needs to be undertaken why the Ellenbrook Park Preservation Trust has not been set up prior to considering any planning submission for a quarry. In particular, reasons why this has not come about, those at fault and an analysis why the public would lose the benefits of the site for the financial gain of a landowner or mineral quarry company, need to be undertaken.

The investigation should determine those who may gain from loss of the green site and whether the delay in forming the The Ellenbrook Park Preservation Trust benefits solely the Goodman Group and/or any companies it deals with for land usage change. It may be beneficial for Goodman Group that the Trust has not been formed so that it can proceed to sell/rent the land to a quarry mineral company, such as Brett Aggregates, for financial profit. Consequently, if a quarry were to be built it needs to be acknowledged that the land may still be owned by the Goodman Group or a mineral company, such as Brett, who could then use the land for future financial gain by selling it/using it for housing, building and industrial works constructions. It would be increasingly difficult for Welwyn/Hatfield Borough Council, St Albans City and District Council, Hatfield Town Council and Colney Heath Parish Council to control how this land is then managed in the future with risks of loss of Green Belt and district amalgamation.

The Welwyn/Hatfield Borough Council, St Albans City and District Council, Hatfield Town Council and Colney Heath Parish Council and Goodman Group need to be questioned as part of this investigation as to why they have not formed the Trust and to ensure for the public that delay or obstruction, by intentionally or non-intentional lack of action, will not be a reason on its own for proceeding to consider application of a quarry construction and loss of the green belt, recreational and wildlife site.

As a result of The Ellenbrook Park Preservation Trust not being formed, in the last 5 years residents of St Albans and Hatfield have not gained full benefit of the 87 hectare park & wildlife site being best managed in terms of access, facilities and wildlife enhancement/protection. Previous consultations have indicated residents' opposition for the land to be lost from its intended purpose for wildlife and recreation and have expressed their frustration and anger that The Ellenbrook Park Preservation Trust has not been formed. This has gone back many years and evidence is clearly available e.g. from Welwyn & Hatfield Borough Council Nov 2012 Emerging Core Strategy consultation (17). This includes comments from St Albans City and District Council Mr Chriss Briggs (ID: 1202) who highlighted the land is important for its recreational use as agreed by St Albans City and

District Council and Welwyn/Hatfield Borough Council and in preventing urban sprawl from Hatfield.

Local and Regional Planning & Boundaries

The site is an area of Green Belt, but as well as providing recreational and environmental benefits, the land serves another purpose in defining the surrounding district regions. As per National Planning Framework Policy 76 March 2012 (10), 'local communities should be able to identify such areas of particular importance to them and hence should be fully consulted in its change of use'. Hence the application of a quarry application should result not just in review of that application, but also in public consultation for change in land use.

It should be made clear that the District Boundaries between St Albans and Hatfield run vertically through the approximate centre of the site which is wholly Green Belt land (**Figure 4**). This has important implications in preserving green recreation use land with ancient woodland and protected species. It also serves as the Green Belt in preventing amalgamation between the two towns (Welwyn & Hatfield Borough Council Nov 2012 Emerging Core Strategy consultation (17). The planned site is on Ellenbrook Nature Reserve/Ellenbrook Field with the majority of the quarry to the West within the district of St Albans (**Figure 1**). All Green Belt would be lost towards the houses on Oaklands Lane. To the East the site crosses Welwyn/Hatfield district with an area between it from the Ancient woods at Home Covert, Cut Field Wood and Round Wood to the Hatfield Business Park.

As is indicated in GB35 (11), this area has 'significant contribution towards preventing merging (of St Albans and Hatfield) and maintaining the existing settlement pattern. Construction of a quarry will considerably change this. The quarry site would cross the district boundaries. The plans of Brett Aggregates that after 32 years of quarrying the land will be converted to recreational use do an injustice with significant harm to the Green Belt, wildlife, loss of recreational space, associated noise, dust, lighting pollution over 32 years working. After 32 years they claim the site will be ready for a conservation area. Such an area would take decades to establish to have some kind of beneficial impact and the harm done over this time span far outweighs any benefit with irreversible habitat and wildlife loss and loss of recreational use for 32 years. After 32 years a significant proportion of the local communities would not benefit from regeneration as they would have moved from the area or died. Also these plans contradict those of Welwyn/Hatfield who have indicated in their Hat2 plans and consultations that they have intentions to consider land use on the Welwyn/Hatfield site to be used for urban sprawl for the building of houses to 2031, during the next 16 years (18), whilst the quarry would be present for 32 years and then need further time for regeneration. No evidence has been provided by Brett Aggregates that either St Albans City and District Council, Welwyn/Hatfield Borough Council or Colney Heath Parish Council are supportive of Brett Aggregates' plans, nor that both district residents have been fully engaged with public consultation regarding the implications and changes to current and future land use, nor on the St Albans City and District Council and Welwyn/Hatfield Borough Council current respective plans for the site.

Previously, Policy CS19 of the Emerging Core Strategy (19) indicated that the site (Ellenbrook Nature Parks/Ellenbrook Fields Country Park) should be safeguarded and they mention that any loss of Ellenbrook Fields Country Park 'could only be acceptable if the remaining part of the park (some of which is in St Albans District) could be secured for the longer term as a high quality informal recreation and nature conservation resource with links to the wider network of green spaces thereby becoming a key part of the wider strategic green infrastructure belt'. The document highlights loss of the Park would critically affect available green space if Hat2 is secured for housing. This indicates a complete lack of planning with

and between St Albans City and District Council and Welwyn/Hatfield Borough Council of the site and future plans.

Allocation for use of the site for a quarry without a full consultation in this regard and with public consultation is likely to result in drastic conflicts of interests between the 2 councils with inappropriate developments and inadequate provision of green space and permanent loss of the green belt, wildlife, recreational use and amalgamation between the towns of St Albans and Hatfield. Implications also may result in residents currently in St Albans becoming resident in Hatfield if it affects the district boundary. There is great potential that residents in the area will ultimately lose the green belt and with development expansion there will be damage to the ancient woodlands to the north and amalgamation of St Albans and Hatfield. These issues should provide enough evidence that the issue is simply not whether a quarry should be allowed to proceed on the site, but that future thoughtful town planning should precede consultations and then any decisions made on Brett's application.

St Albans City and District Council and its residents should be consulted on their thoughts of the development. Current evidence indicate St Albans City and District Council and residents want the area preserved and protected from development. Allowing the quarry to proceed will directly impact on how any future land is utilised by St Albans City and District Council or Welwyn & Hatfield Borough Council and implication of loss of wildlife, recreational land and Green Belt and urban sprawl towards St Albans from Hatfield if, for example, Welwyn & Hatfield Borough Council uses the land on the East of the site to the district boundary to build housing. That would lead to more loss of wildlife, recreational land and Green Belt and amalgamation between St Albans and Hatfield. Document GB35 (11) also highlights that even small scale reduction of the gap between St Albans and Hatfield here would 'negatively impact on overall visual openness'.

The Ellenbrook Nature Reserve/Ellenbrook Park Preservation Trust agreement will have to be broken for acceptance of Brett Aggregates' application. The land was subject of a 106 agreement which designated it Ellenbrook Fields. This fact is not acknowledged in the application or even in the submitted document 'Site Description 2'. The St Albans Strategic Local Plan draft 2016 3.9 (8) mentions the site as an important area to protect (p18) with details how the council want to preserve parkland, trees and open spaces. Section 10.17 (p100) indicates that this Ellenbrook Country Park is being delivered primarily by a Section 106 agreement and involves cross boundary co-operation between St Albans City and District Council and Welwyn & Hatfield Council. Section 10.21 Policy SLP27 indicates St Albans City and District Council's desire for the country park. Brett's plans oppose this with a desire to convert the majority of the site into a quarry.

The fact that the quarry would have to replace the only Green Belt land across adjoining districts of St Albans & Welwyn & Hatfield Borough Council (**Figure 4**) with loss of the only protecting Green Belt between them also conflicts with the Hertfordshire Green Infrastructure plan which recognises the importance of this land for nature conservation ((9) 2.54 p28).

It also conflicts with the Hertfordshire Minerals Local Plan Site Selection Methodology Report May 2015 (11) which clearly indicates regarding Criterion 4 Local Nature Reserves (p15), that, contrary to the proposed Brett Aggregates quarry site, nature conservation and biodiversity loss, habitat loss and fragmentation of green infrastructure should be avoided.

There have been 3 applications for building of new house developments in Smallford in the past 5 years, 2 of these have been over the past year. The first resulted in Pasture View development being built 5 years ago. Chester Nursery development by Crest Nicholson has been given clearance to proceed this month and is currently being constructed off Oaklands Lane and which backs onto the proposed site. Radio Nursery development for 28 houses was refused last month. The quarry application highlights how Smallford is constantly being bombarded with planning applications. However this 87 hectare plan is on a much larger site scale, is an industrial works and is going to disrupt the Green belt greater. The Radio Nursery development application for 28 houses at Smallford off Oaklands Lane was refused a few months ago due to associated Green Belt damage. In particular Document1 Point 10.1) identified inappropriate development in the Green Belt & Point 11i) highlighted detriment to the Green Belt area, 'detriment to the openness of the Metropolitan Green Belt', 'conflict with the purposes of including land within it', 'harm identified is not outweighed by special circumstances', regardless of building on Brownfield land. The effect of 28 houses was considered detrimental for the Green belt, yet the building of this quarry over 87 hectares and for 32 years operation would far exceed these detrimental effects. (20).

Archaeological & Modern History

There has only been one formal evaluation of the archaeological history of the site. The Archaeology Data Services Minerals Areas Characterisation survey was commissioned by Hertfordshire County Council in 2004 to evaluate the site and a document was released in 2005 ((21)). This document clearly indicates this land has 'ancient enclosed fields or woodland' ((21) 4.2.3). They also highlighted 'two significant medieval sites' ((21) 4.2.5). These are at the north at Astwick Manor and south at Hatfield road at Popefield Farm.

The reporters acknowledged that there is limited information, partly due to minimal excavation, but at the West of the site by Oaklands Lane the boundaries are 'of probable 17/18th Century data'. They highlight 'potential for surviving archaeology is moderately good' and that, 'adjacent areas suggest good potential for surviving archaeology ranging from late Bronze Age to Medieval period'. The potential for presence of occupation is unknown which could lead to interesting finds. They noted that area 'retains much of the ancient landscape of woodlands and enclosed fields. The landscape of fields and surviving boundaries is rare locally and should be conserved. Opportunities to re-establish former boundaries should also be attempted'. The site has not been archeologically evaluated fully with 'lack of proper evaluation' but 'there is good probability that the same level of archaeology will be present throughout the site' as seen at Hatfield Aerodrome when the Business park was built. This would result in the site having a score between 10 to 20 i.e. medium to high archaeological potential ((21) p84). Importantly as per Policy 17 development, 'should not be permitted where they would result in the permanent loss or damage or significant and irreversible change to those particular characteristics and features that define the special quality of critical capital or other environmental assets as defined in the Structure Plan'. It is important to note that the evaluation on species and fauna in this document are now well out of date having taken place 11 years ago.

The site has more recent important history as De Havilland were based at the site with the runways and Taxi-lane extending onto it centrally. The production of the Mosquito WW2 bomber and the Comet, which was the first commercial jet airline in the world, and also the Tiger Moth has great national historical importance. Such aircraft were designed, built and tested during and following the 2nd World War here. Nearby is the Flight Test Hanger, which when built in 1950, was the world's largest aluminium structure, that acted as a hanger and control tower. and is one of 2 remaining listed building associated with the De Havilland history. The land was also used by Steven Spielberg for filming Saving Private Ryan in 1998 and Band of Brothers in 2001. Construction of a quarry and use of the land for mineral extraction will result in loss of the remains of significant old and new history. Popefield Farm at the central South side of the site is a Grade 2 listed building (22) that was owned by Sir Tim Rice's parents. It will be surrounded by the quarry and it is difficult to see how that can be considered acceptable to the retaining of a National heritage building. Thus far, Brett Aggregates has not indicated full consultation with English Heritage for that area and the remainder of the site, nor have they provided details of any response from them. Hence, it appears English Heritage has not been given any opportunity to formally voice any concerns.

Influence of the Goodman group

The Goodman Group in the current situation has an unprecedented amount of power owning the site of the land that may be used for mineral extraction as part of Brett Aggregates' planning submission and for building housing as part of Welwyn & Hatfield Borough Council Hat2 expansion plans. They also own the adjacent land on which the Hatfield business park was built. It would not be appropriate that their influence will determine the future loss of Green Belt, damage to local wildlife, Ancient Woodland and Tree Reserve and archaeology/history and expansions and amalgamation of St Albans & Hatfield. The quarry plans are over 32+ years and the Goodman Group control of the land needs to be fully evaluated on how it may impact on plans of St Albans City and District Council and Welwyn & Hatfield Council.

Goodman were supposed to form the Ellenbrook Park Trust with St Albans City and District Council, Welwyn & Hatfield Borough Council and Colney Heath Parish Council for the use of the whole land for recreation and protection of wildlife/green space (**Figure 3**). It is unclear if this did not happen intentionally or not by the in-actions of Welwyn/Hatfield Borough Council, St Albans City and District Council, Hatfield Town Council and Colney Heath Parish Council with the Goodman Group. The land was agreed to be preserved in Ellenbrook Park Preservation Trust (**Figures 2, 3**) and is now under a 106 agreement and involves cross boundary co-operation between St Albans City and District Council and Welwyn & Hatfield Council. The St Albans Strategic Local Plan draft 2016 Section 10.21 Policy SLP27 (**8**) indicates St Albans City and District Council's desire for the country park. Section 3.9 mentions the site as an important area to protect (p18). Section 10.17 ((**8**) p100) indicates how the Council want to preserve parkland, trees and open spaces.

Goodman are to gain greatly financially by selling or leasing the land to Brett Aggregates for a quarry. It would obviously be more difficult for Brett Aggregates to make their application if a Trust had been formed and land areas protected or allocated for certain uses by such a Trust. Even if the land is not sold to Brett Aggregates by Goodman, if it is leased for the purpose of a quarry they are to gain significantly financially. If this application by Brett Aggregates fails, in the future Goodman are likely to seek other avenues of selling/leasing the land for financial profit. Hence assessment and investigation of the Goodman Group plans and influence on the proposal should be undertaken, not just because of the implications of Brett's application but also because they will influence outcomes and desires of St Albans City and District Council and Welwyn & Hatfield Borough Council of the land over future decades.

Implications of the Brett Aggregates Application

The Brett Aggregates proposal is the most detrimental and huge scale planning application not just for Smallford but for all of St Albans & nearby Hatfield. The scale of the site at up to 870,000 square meters represents a size 2.5 greater than the proposed site for a Rail Freight terminal in nearby Radlett (330,000 square meters) which was recently refused after a Secretary of State appeal in 2015. As an industrial site it is going to kill the Green Belt in this area, cause traffic congestion to St Albans, Hatfield, Oaklands Lane and increase demands on A1M and A414 and the movement of vehicles. The application indicates that minerals will be also processed on this site which bring with it extra concerns. HGV distribution of minerals on neighbouring roads to local and distant businesses will add more dust and air pollution to the local infrastructure with problems of mineral dirt and dust being spread onto local and distant roads. The works and the associated extra vehicles will also increase noise pollution to the area.

Impact on Road Network and Access Proximity to Housing & Local Residents

The application has indicated the works will create an extra 194 vehicle movements daily of which 174 are HGV vehicles. The working hours proposed Monday to Friday 07:00 to 18:00 hours and Saturday 07:00 to 13:00 hours will directly impact on rush hour periods and be continuous throughout the day. Vehicle movements indicate an extra 1 vehicle every 3 minutes on Hatfield Road potentially passing onto or past Oaklands Lane, towards St Albans or Hatfield and the A1M/A414. Cemex on the adjacent quarry at the North of the site have had acceptance on 10th February 2016 (23) to continue their operations and to infill their quarry. This application has accepted 300 HGV vehicles per day to enter/leave from Oaklands Lane towards Hatfield Road. This alone is going to place unprecedented strain on the highways network but synergistically will cause traffic congestion and stacking.

The plans will impact on residents houses that line the site and those along the whole of Hatfield road, Oaklands Lane & Ellenbrook. It will also impact on the adjoining Hertfordshire University campus and playing fields, Hatfield Business Park and local businesses on these roads and towards the centre of St Albans and to the Hatfield Galleria as residents, commuters and shoppers need to utilise these access routes which will have extra demand by HGV vehicles from the access site on Hatfield Road (**Figure 5**). This is already a very busy and congested road that leads traffic to and from St Albans and Hatfield. The plans are for quarry work to last 32 years so the impact will not just be huge due to the site scale but for a considerable time too. The impact will be significantly increased noise, deteriorating traffic, dust and dirt on the roads and damage to local wildlife.

Such access with the high number of HGV lorries entering/leaving the site and using these nearby roads is going to cause major traffic and safety concerns around the whole of Smallford and with knock-on disruption, congestion and busy traffic on Hatfield road, a main road leading into the centre of St Albans and Hatfield and to road networks to/from the A1M. The roundabout at Smallford on Hatfield road is currently damaged regularly by HGV vehicles and this will likely increase with increased numbers from this quarry and the Cemex quarry on Oaklands Lane, which will bring an extra 300 HGV vehicles per day travelling to the roundabout. The access site opens directly onto Hatfield road and will stop the flow of traffic in and out of St Albans and will increase the risk of collisions to vehicles and pedestrian injury. The proposed site is within approximately 250 yards of a pedestrian crossing which is the only one for approximately 1 mile and no safety measures have been discussed. The closeness of a HGV vehicle access site with frequent vehicle movements is

dangerous and poorly thought out in just this respect. Frequent high volume of movement of HGV vehicles with dust thrown from tyres can impact on deteriorating road surfaces and increase risk of skidding/braking problems.

The fact that Crest Nicholson has been granted permission to build 22 new houses off Oaklands Lane (24), which are being constructed at this time, in itself will increase traffic onto Hatfield Road and at the Smallford roundabout and has not been considered by the applicant. With the added number of vehicles from this location and the quarry access site extra strain will be placed on the road network and roundabout such that it cannot safely cope.

The plans indicate there will be building of a site access road within Green Belt land behind the houses on Oaklands Lane connecting Hatfield road to Coopers Green Lane.

The application indicates a new constructed road will be built for use of the quarry but the plans indicate it will then remain after the quarry ceases operation in 32+ years, linking Hatfield road and Coopers Green Lane. Again the application has not considered the detrimental impact on the roads which will further increase congestion and traffic by allowing new traffic to directly access Hatfield road behind Oaklands Lane. This does not bring benefit but only further problems to the locality and detrimentally affects access, congestion and traffic volume to the area which is in the Green Belt. The location is going to be severely damaged and a place where people will not want to live. Access into and out of St Albans & Hatfield will be disrupted with constant HGVs and more traffic.

Location of National Grid Gas Pipeline

The site on the west has a major National Grid gas pipeline of a 1200mm (four foot) that traverses the whole of the North-South length of the site. This is clearly marked on the site (Figures 6, 7) In itself the location of this gas pipeline poses a severe risk as it is within 250m of houses that line Oaklands Lane and approximately 50m from Notcutts Garden Centre and the new housing development being built by Crest Nicholson at the Chester Nursery site (St Albans District Council planning application reference: 5/2015/0644). This risk would be present during construction of the Quarry and throughout 32 years of its use. Considering solely the construction of the access site location, as the access road onto the quarry will overly/be adjacent to this gas pipeline it poses a serious danger threat for injury/death to local residents/business workers and to buildings. With 32 years of constant HGV vehicles use and adjacent quarry work to the gas pipeline the risks are real, constant and serious. Any consideration to undertake a quarry need to strictly comply with National Grid requirements (25)

Air Quality Impact on Proximity to Housing & Local Residents

There are important issues with the site use. The entrance road to the site is within 250m of properties on Oakland Lane. The increased noise of the traffic and effects of the dust on residents has not been consulted and evidence not provided by Brett Aggregates to indicate safety on air pollution and noise mitigation. In itself, the close proximity is going to result in legal evaluations regarding why local environmental searches by prospective home purchasers have not highlighted that the site has been earmarked for mineral quarrying since 2001, nor the level of proximity of access to a quarry site to the houses.

The boundaries of houses on Oaklands Lane are at or below 200m from the proposed site and gas pipeline. There has been no investigation or research regarding the air dust pollution that will arise from the quarry. A major concern is that the close proximity of houses and residents on Oaklands Lane and at other adjacent sites will expose residents continuously for

32 years with levels of air pollution that could be high enough to cause respiratory compromise or exacerbate pre-existing medical respiratory conditions such as emphysema and asthma. It should be made clear that this can be associated with significant illness and would carry a high chance of successful compensation claims and legal challenges against a business who undertakes work associated with these complication and against local authorities who authorise their work without adequate proof of safety over 32 years of exposure. The problem will be compounded by the frequent and high volume of movement of HGV vehicles carrying minerals around the locality and further increasing dust/air pollution from dust thrown from the vehicles and tyres. The impact on deteriorating the road surface and impact on reducing vehicle braking/increasing risk of skidding needs to also be considered.

Site Danger Impact on Proximity to Housing & Local Residents

As has been previously mentioned, the impact of the HGV vehicles and entrance to the site on the busy Hatfield Road as a main road into and out of St Albans will increase congestion, and volume (**Figure 5**). There will be an increased risk of accidents related to the nearby pedestrian crossing at approximately 50m and Smallford roundabout at which there will be more volume and congestion of traffic. The need for HGV vehicles to turn right from the access site will compound these problems by vehicles cutting across Hatfield Road and will reduce the flow of traffic in directions into and out of St Albans.

Quarrying on the site will bring new dangers to the local region. As mentioned previously, there is a National Grid gas pipeline that traverses the whole of the North-South length of the site where the intended access site will be adjacent to. This is at 200-250m to houses on Oaklands Lane and within 50m of Notcutts Garden Centre and boundary of the Chester Nursery housing development. The site was originally utilised as an airfield for De Havilland airplanes and was bombed as a strategic target in World War 2 on several occasions. It has been marked previously by Ordnance Survey as previously used military land. There is history of unexploded bombs being found and detonated on the site prior to the Gas Pipeline installation. Quarrying on this site carries a risk of encountering such unexploded bombs. The Construction Industry Research and Information Association (CIRIA) have been contacted and have informed that 10% of the ordinance dropped on the UK during WWII failed to detonate on impact and that it would not be unusual to find such ordinance at a depth of 4-5 meters below the surface at this site. A quarry would dig and utilise land to a greater depth. This risk must be taken seriously and especially with the gas pipeline on the site. The concern is real and demonstrated by an unexploded bomb being discovered on the adjacent Cemex quarry site at the North-West edge of the site, prior to, but at the site of the gas pipeline construction.

A likely impact that will concern local businesses and residents is a decrease in property prices surrounding the site on Oakland Lane & Hatfield Road. Property values will drop drastically since the area will change from a Green Belt to that with an industrial quarry. This impact will also be consequently experienced by properties at the rest of Hatfield Road, Station Road and Ellenbrook and will further impact towards the centres of St Albans and Hatfield.

Methods utilised by Brett Aggregates Application and Errors of Concern

Brett Aggregates has used inadequate means to inform residents in the area of all the important facts regarding their proposals. Flyer drops into letterboxes took place in Smallford on the week of 19th October. However many residents, who will be adjacent to the site, including in Smallford, along Hatfield Road near the Three Horseshoes Pub and further towards the University around Ellenbrook did not receive them, including businesses. The local residents are aware that flyers have been handed out by Brett Aggregates in a random fashion and not to everyone in the area. There was only 1 week given before an exhibition at St Albans Rugby Club on Wednesday 28th October, the following week. The application submission will be the first opportunity for many local residents and businesses to review the plans. The impact of the plans will be widespread to St Albans and Hatfield as indicated previously in regards to wildlife, recreation, the road networks, air/noise pollution and local planning, and not just to the immediate locality. The application is the first formal means for the rest of St Albans and Hatfield to be made aware.

Informing only a few houses only by fliers and suddenly setting up a meeting to show plans to residents is not an appropriate way to properly consult residents, but in the process they can expect to receive fewer complaints. This is not a proper formal consultation and highlighted by the short time-span of 1 week from flyer delivery to showing their exhibition. There should be a more formal consultation via the St Albans District Council/Colney Heath Parish Council & Welwyn & Hatfield Borough Council residents regarding such an important, wide-reaching and long term affecting application, as outlined in this document.

Incomplete information is contained within their distribution document e.g. not providing details of loss of Ellenbrook Nature Park/Ellenbrook Fields, full details of numbers of lorries entering/leaving the site and position of a site access road in close proximity behind resident's properties on Oaklands Lane, Smallford and not indicating that the road will link Hatfield Road to Coopers Green Lane thereafter for 32 years.

A lack of meaningful prior dialogue with locals before indicating the proposals and showing a lack of consideration of the needs of locals has heightened concerns of residents of St Albans and Hatfield. Brett Aggregates suggested in their flyer that 'the land use does not have any dominant use'. This is incorrect as highlighted by the wildlife and archaeological/historical value indicated in this report and has completely devalued the importance that the land forms parkland and a district boundary with the role of providing important recreational, wildlife and historic use. Also the initial flyer clearly did not indicate that the quarry will be operational for 32 years or the times of operations to prevent opposition and questioning. This timeframe only became knowledge once locals had managed to search online and locate the scoping document produced by SLR Consulting (2) on behalf of Brett Aggregates, of which information is also not provided on their flyer.

No information has been provided by Brett Aggregates that they have received formal consultation responses from organisations that are affected by the proposal. This includes organisations such as Hertfordshire & Middlesex Wildlife Fund, RSPB, Ramblers Association, English Heritage, De Havilland Museum and Hertfordshire Highways Agency.

Errors of Concern

There are several major areas of concern regarding the method of application that highlight inaccurate and insufficient information has been provided by Brett Aggregates in their application. Also, in certain areas the details provided are significantly incorrect.

The letter sent to locals from Brian Owen, Team Leader, Development Management from Hertfordshire Spatial Planning and Economy Unit, dated 5th February 2016 details the application but does not clearly indicate the reference number, only directing to www.hertsdirect.org/planning making it difficult to view the application. For such a large scale application this is completely unacceptable as it prevents easy application review. In regards to this letter it informs only acceptance of comments is being made by letter which again will hinder meaningful consultation. The timeframe of 21 days is inadequate for response. Planning applications routinely allow online comments to be made over a sufficient time and by more convenient and accessible online methods.

Point 3 in the application document does not give any information regarding the vast proposed site to be 87 hectares or indicate the huge scale. Diagrams submitted by Brett Aggregates indicate one of the conveyor belts for moving the quarried minerals is to be approximately 1Km in length.

Point 3 does not indicate anywhere that the land is to be changed from Green Belt land with the Ellenbrook Nature Park and Ellenbrook Tree Reserve with recreational use to an industrial site.

Point 5 incorrectly indicates that pre-application advice from Mr Chay Dempster was related to the Statement of Community Engagement. That brief document has no value in terms of responses in consultation, except that 80 people who attended a display indicated their concerns. No factual details of consultation results are provided from stakeholders or individuals independently. The few details given are subjective and by the applicant. It is interesting to note that the applicant themselves felt obliged that letters informing that they had submitted a planning proposal for their quarry were sent out on February 5th 2016 prior to any formal public consultation. Also the applicant was obliged to inform over 1020 adjacent households and businesses, indicating that a cohort of 80 basic responses of concerns would, in itself, be considered inadequate for community engagement. This is further heightened by the fact that a 87 hectare site of industrial scale quarrying will have more dramatic effects on the towns and infrastructure, movement of people and goods in and around St Albans and Hatfield, rather than just adjacent to the proposed site.

Point 6 raises concerns as:

- i)no mention of new or altered pedestrian access from the public highway contradicts the plans which indicate removal of the public footpath/bridleway on the site
- ii)no mention of new public right of way is mentioned. In fact the plans indicate building of the access road to produce a new road connecting Hatfield road to Coopers Green Lane which would be operational following the quarry.

Point 7 indicates the applicant is not going to be storing any waste or undertaking collection of waste. This is surely misleading as it is inconceivable that a quarry site of 87 hectares and operational over 32 years will not have either concerns.

Point 9 has no provided information on materials for buildings, yet the application is for a quarry and, as indicated in Point 3, by the applicant, will have 'aggregate processing plant, concrete batching plant and other ancillary facilities'.

Point 10 has been completed indicating that there will only be 7 car spaces on site, giving an unrealistic portrayal of the intensity of the work being undertaken at the quarry over 32 years. It is highly implausible that only 7 cars will be parked on an 87 hectare operational quarry which will incorporate HGV vehicles moving minerals to the roads more than once every 10 minutes between 07:00 am and 18:00 pm Monday to Friday and 07:00 to 13:00 on Saturday.

Point 13 correctly mentions that there are numerous protected wildlife species on the site, but incorrectly mentions that designated sites, important habitats and biodiversity features are on adjacent land. These are on the actual site. As mentioned previously, the proposed site is on the Ellenbrook Nature Park/Ellenbrook Fields, which is subject to a 106 agreement.

The St Albans Strategic Local Plan draft 2016 3.9 (8) mentions the site as an important area to protect (p18) with details how the council want to preserve parkland, trees and open spaces. Section 10.17 ((8) p100) indicates that this Ellenbrook Country Park is being delivered primarily by a Section 106 agreement and involves cross boundary co-operation between St Albans City and District Council and Welwyn & Hatfield Council. Section 10.21 Policy SLP27 (8) indicates St Albans City and District Council's desire for the country park. Brett's plans conflicts with this and the Hertfordshire Green Infrastructure plan which recognises the importance of this land for nature conservation ((9) 2.54 p28).

The SLR consultation document commissioned by Brett Aggregates even clearly indicated that on the site there are 'great crested newts and other protected species in locations affected by the proposals' ((2) Table p24). The report indicated that only 'baseline ecological surveys commenced in autumn 2014' ((2) 5.5.5 p27) had been undertaken. They mentioned that they expected common reptiles to be identified and that Great crested newts were already identified in 5 of 10 ponds being surveyed at that stage. This conflicts with the Hertfordshire Minerals Local Plan Site Selection Methodology Report May 2015 (11) which clearly indicates regarding Criterion 4 Local Nature Reserves (p15), that contrary to the proposed quarry site, nature conservation and biodiversity loss, habitat loss and fragmentation of green infrastructure should be avoided here. The Hertfordshire Mineral Local Plan Review 2002-2006, Adopted March 2007 (7) highlighted that this site; 3.1.2, 'has a rich cultural heritage which must be protected', 'protected areas of nature conservation interest must be protected'. It also highlights that 'Ellenbrook Linear Park is excluded' and that, 'buffer zones will be required to protect the amenity of residents at Ellenbrook, Smallford and Popefield Farm'. The Mid Hertfordshire local group of the Hertfordshire and Middlesex Wildlife Trusts have documented observations of Barn Owls (4). The St Albans Local Group of the RSPB documented sightings of other rare birds such as red kite, sparrowhawks, kestrel, skylarks, woodpeckers and whitethroat, treecreeper and amandin (5) and have a planned visit in January 2016 (6). Hence, the information provided by Brett Aggregates is inaccurate, deficient and misleading.

Point 15 wrongly states that there are no trees/hedges adjacent to the site that could be influenced by the development. The site is to remove Ellenbrook Nature Park which has on it Ellenbrook tree reserve that was planted from 2010. The North-East boundary is adjacent to Ancient woods at Home Covert, Cut Field Wood and Round Wood which are ancient woods

with important ecosystems, wildlife, trees and animal habitats. Hertfordshire Minerals Areas of Historic Environment Characterisation Project (21) clearly indicates this land has 'ancient enclosed fields or woodland' (4.2.3). They also highlighted 'two significant medieval sites' (4.2.5). These are at the north at Astwick Manor and south at Hatfield road at Popefield Farm.

The inaccurate facts are further evident in the submitted document 'Site Description 2', where it is stated that there is 'No national Nature Reserve; No special scientific Interest; No Registered Park or Garden'.

The SLR scoping document (2) utilised by Brett Aggregates to gain acceptance of its plans is solely an initial scoping document commissioned for by Brett. It is not an impartial document and has had no external bodies independently review or amend it in any way. There are many stakeholders for the site that will need to add their own assessments, evidence and concerns such as the Hertfordshire and Middlesex Wildlife Trusts, RSPB, Rambles Associations and English Heritage. These bodies should be consulted fully to make their representations.

Although there is mention that contact has been made with the National Grid regarding the gas pipeline there is no submitted details regarding the application operation complying with their strict requirements. Excavation and infilling of the site should only be carried out in compliance with the National Grids detailed individual site requirements (25).

The Hertfordshire Mineral Local Plan Review 2002-2006, Adopted March 2007 p77 (7) indicated that Bromate contamination is on the site and may impact upon the Three Valleys water source at the public water source at Bishops Rise. This has not been addressed by the applicant. The Department of the Environment granted permission for treated domestic waste water from Popefield Farm to be discharged into the small stream to the east of the property. No mention has been made if this stream will continue to flow and management of any resultant waste disposal problems.

Hertfordshire Mineral Local Plan Review 2002-2016, Adopted 2007 Document

The evidence provided in this document indicates it is essential that Hertfordshire County Council indicate why this particular site should progress to mineral extraction and construction of a quarry over any of the other sites listed in the Hertfordshire Mineral Local Plan Review 2002-2006, Adopted March 2007 document, or at other new sites to be evaluated, or consequently after current ongoing consultations on the plan. An update of the plan has not been produced since 2007.

The Hertfordshire Mineral Local Plan Review 2002-2006, Adopted March 2007 document (7) does not evaluate on merit each of the locations based on this most recent evidence provided, or details like this for other sites. The document acts to identify the needs of Hertfordshire and possible locations of mineral sites that could be utilised in the future. Hence it should not be presumed that this site should be the first for development, but further assessed what is in the best interests for local residents, businesses and surrounding towns. Residents all over St Albans and Hatfield will ultimately voice their concerns provided they are formally and appropriately consulted. At the North West of the site there is already a quarry under control of Cemex. This site was due to end on 1st October 2020 but Cemex's application for extension of time to infill and restore the quarry has been accepted on 10th February 2016 (23). Hence, there will be increased operations and HGV traffic loads of 300 per day from Oaklands Lane and towards Hatfield Road from just this operation. There is a lack of essential collaborative planning for the use of the land applied for by Brett Aggregates and its effects locally. Brett Aggregates have provided no consideration of these facts and the Hertfordshire Mineral Local Plan Review 2002-2006, Adopted March 2007 document, being out of date, doesn't highlight this. Acknowledgement must be made that this new proposal by will effectively remove all Green Belt land at this site and with the existing Cemex quarry operations will result in significant land being quarried for minerals/filled with severe disruptions to the local highways.

Hertfordshire County Council is currently reviewing the adopted Mineral Local Plan document (26). As this is not complete it is inappropriate for a decision to be made on Brett Aggregates' application until completed. As stated, this review should ensure that 'minerals planning applications in the county are relevant to the situation in Hertfordshire'. Hence, it is clear that the information in this report should be utilised. It is interesting that Brett Aggregates have made an application in 2015, one year before the allocated 2016 review completion process of the MLP. This may have served an opportunity to obtain acceptance of their plans without full information of the site as provided in this report.

The Hertfordshire Mineral Local Plan Review 2002-2006, Adopted March 2007 document 3.1.2 (7) highlighted that this site's importance conflicts greatly with being used as a quarry; 'It has a rich cultural heritage which must be protected', 'protected areas of nature conservation interest must be protected'. It also highlights that 'Ellenbrook Linear Park is excluded' and that, 'buffer zones will be required to protect the amenity of residents at Ellenbrook, Smallford and Popefield Farm'. On all these issues, the Brett Aggregates application fails.

The Hertfordshire Mineral Local Plan Review 2002-2006, Adopted March 2007 document which is being quoted by Brett Aggregates in their application is now due for termination. Hertfordshire County Council are in the early stages reviewing this document (27) and had an initial consultation 3rd August - 16 October 2015 prior to release of new future draft plan.

However, this initial stage did not even include any potential future sites or policies for future planning applications and hence there has not been an opportunity for sites such as the proposed one by Brett Aggregates to be discussed yet. The plan is for a submission to be ready for submission to the Secretary of State in summer 2018. As the review is not complete it is inappropriate for an acceptance to be made on Brett Aggregates' application.

One major concern of how the current document does not provide adequate purpose to the proposed site applied is how it cannot relate to the site's sensitivities. That document was adopted in 2007, and hence fails to recognise that the whole site proposed by Brett Aggregates is also actually the site of Ellenbrook Nature Park/Ellenbrook Fields which opened in 2010, 3 years later and is subject to a 106 agreement. Consequently, the document and SLR scoping document authorised by Brett Aggregates hasn't considered the whole site as a Nature park with recreational, wildlife and historic value, and has not fully understood the location or the significance that this Green Belt divides St Albans and Hatfield districts, preventing amalgamation/sprawl. It does, however, indicate, 'the site is a possible area of archaeological interest and should include provision for archaeological investigations'. The recent Hertfordshire Minerals Local Plan Site Selection Methodology Report May 2015 clearly indicates, regarding Criterion 4, that contrary to the proposed quarry site, nature conservation and biodiversity loss, habitat loss and fragmentation of green infrastructure should be avoided ((28) p15).

It is interesting that application has been made before the allocated 2016 review completion process of the Hertfordshire Minerals Local Plan. This may have served an opportunity to obtain acceptance of their plans without full information of the planned site. The Hertfordshire Minerals Local Plan document from 2007 does not evaluate on merit each of the locations. It appears a submitting company do not have to prove a site is more preferred. Hertfordshire County Council would need to indicate why this particular site should progress to mineral extraction and construction of a quarry for 32 years with all its associated detrimental effects and concerns indicated in this document on this locality over other sites listed in the document or new sites.

Taking into respect all the issues and problems with this site it should be made clear why this site is preferred over others such as the Rickneys Quarry site, which does not have as significant concerns with archaeological and historic issues, district boundary/green belt functions, amalgamation of two towns, change of land use from Green Belt and breaking Ellenbrook Nature Park Trust & 106 Agreements, loss of recreational land and wildlife & habitats, significant impact on of traffic congestion, noise and dust pollution on nearby and distant communities. The quarry application does not fulfil Aim 3 of the Hertfordshire Minerals Local Plan 2007 document in that it will have a 32 year adverse impact on the environment and local people at this site by operations and transportation of minerals. The document is out of date and does not reflect the current location sensitively or its risks regarding dangers of a gas pipeline, traffic disruption, congestion and excessive volume and damage to Green Belt, wildlife, loss of a tree reserve and Nature Park and loss of Green Belt boundary between 2 districts.

Conclusions

The Brett Aggregates proposal has potential of one of the greatest planning applications to detrimentally and irreversibly affect Smallford and St Albans & adjacent Hatfield. The scale of the plan is huge, functional over a considerably long time at over 32 years and has potential to kill the Green Belt in this area, cause loss of important Green Belt, recreational land, wildlife and habitats, ancient and modern history, archaeology, important WW2 and Aviation history and to cause noise, dust, lighting pollution and traffic gridlock in St Albans and neighbouring Hatfield and cause amalgamation between these two towns. There does not appear to be any benefit for local residents or communities from developing it as a quarry.

Thus far there has been inadequate consultation by Brett Aggregates & local residents and St Albans City and District Council, Welwyn/Hatfield Borough Council and Colney Heath Parish Council who appear to have not fully understood the importance of the land and the application.

There has been a lack of planning to protect the values of the site, highlighted by no Ellenbrook Park Preservation Trust being formed to care for it. The uses for recreation and wildlife protection should be made clear. As noted in the Hertfordshire Strategic green Infrastructure Plan 2011, the site serves key opportunities for habitat improvements, restoration and enhancements. It also appears that the public have currently lost out on being able to use the site to its full recreational and wildlife benefit as it is actually stands. The Ellenbrook Park Trust which should have been formed when the park opened in 2010 was to consist of neighbouring council representatives from Welwyn Hatfield District Council, St Albans City and District Council, Hatfield Town Council, Colney Heath Parish Council. This would have been a great asset in making the site more used by locals and enabled improvements, such as for the local wildlife and access/recreational use for the public. It would have also served to protect the site from damage and plan for its future.

The Brett Aggregates application poses a risk to loss of the Green Belt, wildlife, recreational use, archaeology and to possible future housing construction which will cause amalgamation between St Albans and Hatfield. These issues should be taken seriously and investigated further. A full inquiry needs to be undertaken why Ellenbrook Park Preservation Trust has not come about, those at fault and an analysis of who is at fault and why. This should include the above Councils and Goodman group. The implications if the Goodman Group or another party are fully, or in part responsible, are considerable as the financial gain that a landowner/mineral quarry firm would receive from leasing/utilising or selling the land are likely to extend into the millions of pounds sterling. This is also essential for future applications on the land.

The site also has important implications for long term planning to encompass needs for the future and plans of St Albans City and District Council and Welwyn & Hatfield Borough Council County Councils. The fact that district boundaries of St Albans City and District Council and Welwyn/Hatfield County Councils cross the site should have, in themselves, highlighted the importance of planning for the benefit of the site and for local residents and should have resulted previously in protection.

The proposal of the site to be used by Brett Aggregates for a quarry should be rejected.

1. The application has shown inadequate consultation in regards to change in land use, contradiction to 106 Agreements, National Framework Policy (10), Green Belt Assessment (11) land use, St Albans Strategic Local Plan Draft 2016 (8), Hertfordshire Strategic green Infrastructure Plan (9) and Ellenbrook Park Preservation Trust (12) (13).

2. The effect on local and distant road networks and danger closer to the site access in terms of vehicles, pedestrians and congestion are also detrimental. The site and its access is fundamentally unsustainable and still would need to be proven. The current load and high demand on the local roads and access site has not been evaluated adequately. Recent local housing developments that have been agreed are going to increase capacity before the extra demand by a quarry. This is compounded by the recent planning acceptance for Cemex to infill their adjacent quarry with 300 HGV movements per day. 32 years of operations with considerable times of work on 6 days of the week with 194 extra vehicles from this application are unmanageable and have not been shown to be acceptable.

3. No evidence has been provided that this site is better than another for such a mineral quarry. Rickneys Quarry site does not have as significant concerns with archaeological and historic issues, district boundary/green belt functions, amalgamation of two towns, change of land use from Green Belt and breaking Ellenbrook Nature Park Trust & 106 Agreements, loss of recreational land and wildlife & habitats, significant impact on traffic congestion, noise and dust pollution on nearby and distant communities and the dangers with a gas pipeline on the site. Other sites may also be more preferential considering the Hertfordshire Mineral Local Plan Review 2002-2006, Adopted March 2007 (7) document is out of date and does not now represent the current site use and its sensitivities. That document only set out potential sites and does not determine which is most appropriate.

4. There has not been any adequate data and research indicating safety in terms of air pollution from dust exposure to the local area. 32 years of exposure to local residents and businesses carries high risk in regards to respiratory disease and exacerbation of pre-existing conditions. This may result in successful legal challenges against authorities/mineral firms by those affected. This needs to be considered with the adjacent Cemex quarry work and the combined increased HGV vehicle loads in the area that these two works bring.

5. The application has significant errors and omissions in regards to the site, wildlife, green belt use, buildings and traffic impact that cannot be ignored and hence make the application untrustworthy and untenable.

6. Ellenbrook Fields was established by way of a section 106 agreement between St Albans City and District Council, Welwyn/Hatfield Borough Council. The Ellenbrook Park Preservation Trust was agreed to be set up with these Councils, Colney Heath Parish Council and Goodman Group. A full inquiry needs to be undertaken why the Ellenbrook Park Preservation Trust has not been set up prior to considering any planning submission. In particular, reasons why this has not come about, those at fault and an analysis why the public should lose the benefits of the site for the financial gain of a landowner, mineral company or third party need to be undertaken.

The investigation should determine those who may gain from loss of the green belt site and the delay in forming the The Ellenbrook Park Preservation Trust. This includes investigation into the above Councils and Goodman Group. The public should be content that delay or obstruction, intentionally or not by lack of action, will not prejudice this application with the associated loss of Green Belt, recreational amenities, wildlife and their habitats. The Trust

should be established over others' gain, including financial. Investigation should also make clear the influences and intentions associated stakeholders have on future developments including housing and district amalgamation.

7. The site has importance in regards to ancient archaeology and modern WW2 history and has the listed Popefield Farm building. Full appreciation needs to be duly given to these issues which has not been performed. Full consultations need to be undertaken by affected stakeholders and time given for them to voice their concerns.

8. The site/adjacent land has been shown to have bromate contamination that could affect a water source. No indication of how this will be affected the plans has been made clear or how it will be managed if issues arise. The adjacent running stream to Popefield Farm currently discharges residential effluent into a running stream by agreement with the Environment agency. There are no provisions to ensure that this stream continues to flow or how it will be managed.

9. The National Grid gas pipeline crosses the West of the site from South to North. There is no evidence that guide lines to ensure its protection are being followed for safety to the area and local houses and businesses. These do not seem to have been taken into proper account especially as there are potential unexploded ordinance bombs from WW2 on the site.

10. Various organisations have made it clear previously that the site has importance for recreation use, access footpath use, historic interest, important wild life and habitats including protected species with potential permanent destruction. Adjacent ancient woods and their wildlife and habitats will also be affected or destroyed.

11. The plans of works are from 07:00 am and 18:00 pm Monday to Friday and 07:00 to 13:00 on Saturday for 32 years. There is no evidence provided that the plans are sustainable for this extent in this locality, nor that it needs this operation.

12. The Brett Quarry application does not fulfil Aim 3 of the Hertfordshire Mineral Local Plan Review 2002-2006, Adopted March 2007 document (7) or the methodology outlined in the Hertfordshire Mineral Local Plan Site Selection Methodology Report (28). It will have a 32 year adverse impact on the environment, highways and local businesses and people.

Images

Figure 1



Map of the proposed site in red

Smallford with Oaklands Lane (Pink). Houses to West (Orange) and proposed access road/National Grid Gas Pipeline (Yellow). Current Cemex quarry to North West (Grey). Adjacent ancient woods to North East. De Havilland runway extends into centre of site

Figure 2



Ellenbrook Nature Park/Ellenbrook Fields site showing extent to Hatfield on the East with Hatfield Business Park. The boundary (to the left) extends towards Oaklands Lane/Notcutts Garden Centre, St Albans. Popefield Farm is at the bottom square midway at the district boundary between St Albans and Hatfield. Ellenbrook Tree reserve is to the North-East

Figure 3

14 Herts Advertiser, Thursday, February 3, 2011 www.hertsad24.co.uk



Keen St Albans composter, Ian Maskell

Getting your composting off to a good start

If you still have leaves lying about in the garden, or you want to know how to compost your green kitchen waste, www.rocyleanow.com has some great tips and advice.

There are step-by-step guides on things like getting the right composting mix and making the perfect leafmould and lots of

greenpage

**St Albans**
City & District Council



Ellenbrook Fields country park now open

A 400-acre country park on the former aerodrome site between Hatfield and St Albans is now open to the public.

The site, known as Ellenbrook Fields, was once part of the British Aerospace site and was at one time used as a jet engine test area and airfield – as well as a blockbuster movie set in later life!

It has now been converted into a large open space for the public to enjoy.

Back in 2000, Welwyn Hatfield Borough Council and St Albans City & District Council secured the site as green space as part of the planning permission granted for the development of Hatfield Business Park.

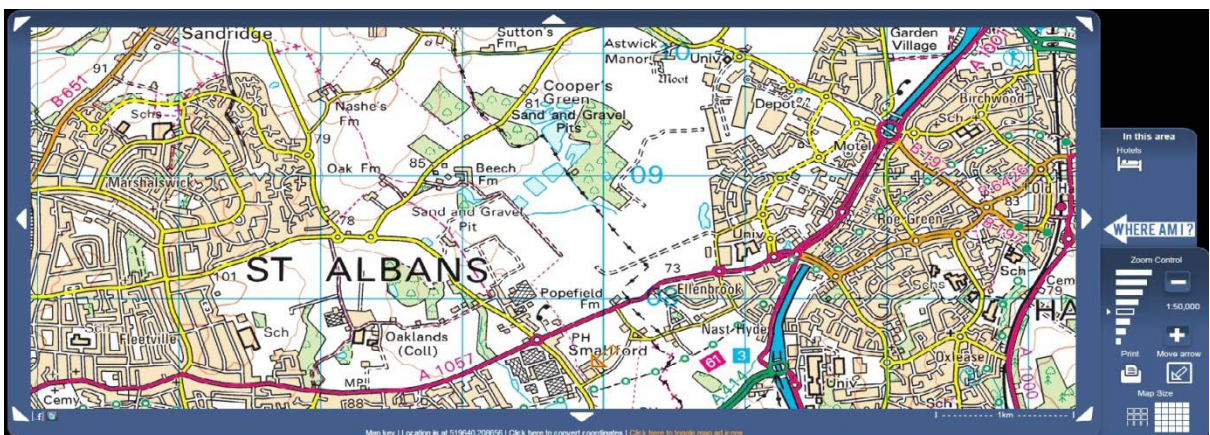
Following land surveys and substantial landscaping, the site has been converted into parkland with footpaths, hay meadows, a bridleway and woodland. It will also retain the taxiway for heritage and access purposes and have information panels, picnic benches and seating. Approximately half of the remaining park land will then be used for cattle grazing with Longhorn Cows introduced into the park.

Ellenbrook Park was used as part of the set for Saving Private Ryan in 1998 and Band of Brothers in 2001.

Information on the site can be downloaded from: www.welhat.gov.uk/ellenbrook

Article from the HertsAdvertiser newspaper in 2011 detailing the whole site to be secured by St Albans City & District and Welwyn/Hatfield Borough Councils as green space parkland with 106 Agreement

Figure 4



Map indicating district boundary running vertically (hashed line) almost centrally through site.

Figure 5



Hatfield Road looking at proposed access site past the footpath sign at current entrance for walkers. This is a busy road linking St Albans and Hatfield

Figure 6



National Grid pipeline marked on the site at West close to Oaklands Lane, Notcutts Garden Centre and Chester Nursery housing development. One of the new tree plantations in distance

Figure 7



National Grid pipeline marked on the site at West and one of the new tree plantations

Figure 8



Extent of site size. Hatfield Business Park visible in distance

Figure 9



Muntjac deer and foxes traverse the site and enter gardens of residents in Oaklands Lane

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