

Colin Haigh  
Head of Planning  
Welwyn-Hatfield District Council  
The Campus  
Welwyn Garden City  
Hertfordshire  
AL8 6AE

**Our ref:** NE/2019/130192/01-L01  
**Your ref:** 6/2019/0882/OUTLINE  
**Date:** 9 May 2019

Dear Colin

**Outline permission for residential development of site of up to 38 dwellings following demolition of the existing buildings and structures with all matters reserved apart from access.**

**Colesdale Farm, Northaw Road, West Northaw, Potters Bar, EN6 4QZ**

We have no objection to the planning application as submitted. Please note the following advice:

The site lies on a Secondary A aquifer (Lambeth Group) though not in a Source Protection Zone and the application form indicates that land contamination is suspected for all or part of the site. We are currently operating with a significantly reduced resource in our Groundwater and Contaminated Land Team in Hertfordshire and North London Area. This has regrettably affected our ability to respond to Local Planning Authorities for some planning consultations. We are not providing specific advice on the risks to controlled waters for this site as we need to concentrate our local resources on the highest risk proposals.

We recommend, however, that the requirements of the [National Planning Policy Framework](#) and [National Planning Policy Guidance](#) (NPPG) are still followed. This means that all risks to groundwater and surface waters from contamination need to be identified so that appropriate remedial action can be taken. This should be in addition to the risk to human health that your Environmental Health Department will be looking at.

We expect reports and Risk Assessments to be prepared in line with our [Groundwater Protection](#) guidance (previously covered by the GP3) and CLR11 (Model Procedures for the Management of Land Contamination).

In order to protect groundwater quality from further deterioration:

- No infiltration-based sustainable drainage systems should be constructed on land affected by contamination, as contaminants can remobilise and cause groundwater pollution.
- Piling, or any other foundation designs using penetrative methods, should not cause preferential pathways for contaminants to migrate to groundwater and cause pollution.
- Decommission of investigative boreholes to ensure that redundant boreholes are safe and secure, and do not cause groundwater pollution or loss of water supplies, in line with paragraph 170 of the National Planning Policy Framework.

The applicant should refer to the following sources of information and advice in dealing with land affected by contamination, especially with respect to protection of the groundwater beneath the site:

- From [www.gov.uk](http://www.gov.uk):
  - [The Environment Agency's approach to groundwater protection](#) (2017)
  - Our [Technical Guidance Pages](#), which includes links to CLR11 (Model Procedures for the Management of Land Contamination) and GPLC (Environment Agency's Guiding Principles for Land Contamination) in the 'overarching documents' section
  - Use [MCERTS](#) accredited methods for testing contaminated soils at the site
- From the [National Planning Practice Guidance](#):
  - [Land affected by contamination](#)
- [British Standards](#) when investigating potentially contaminated sites and groundwater:
  - BS 5930:2015 Code of practice for site investigations;
  - BS 10175:2011 A2:2017 Code of practice for investigation of potentially contaminated sites
  - BS ISO 5667-22:2010 Water quality. Sampling. Guidance on the design and installation of groundwater monitoring points
  - BS ISO 5667-11:2009 Water quality. Sampling. Guidance on sampling of groundwaters (A minimum of 3 groundwater monitoring boreholes are required to establish the groundwater levels, flow patterns and groundwater quality.)

All investigations of land potentially affected by contamination should be carried out by or under the direction of a suitably qualified competent person. The competent person would normally be expected to be a chartered member of an appropriate body (such as the Institution of Civil Engineers, Geological Society of London, Royal Institution of Chartered Surveyors, Institution of Environmental Management) and also have relevant experience of investigating contaminated sites.

You may wish to consider using the [National Quality Mark Scheme for Land Contamination Management](#) which involves the use of competent persons to ensure that land contamination risks are appropriately managed.

Although the application form indicates the development is within 20 metres of a main river our constraint checks do not show this. If there were to be any works within 8 metres of a main river (Hempshill Brook) a Flood Risk Activity Permit may be required from us.

If you have any further queries please contact me.

Yours sincerely

**Keira Murphy**  
**Planning Specialist**  
Direct dial 0203 025 5560  
E-mail [HNL.SustainablePlaces@environment-agency.gov.uk](mailto:HNL.SustainablePlaces@environment-agency.gov.uk)