

## **TECHNICAL NOTE**

Job Name: Redevelopment of the Former VW Garage, Comet Way, Hatfield

**Job No:** 332610303

Note No: TN001

**Date:** 19/10/2023

Prepared By: O Belson

Subject: Updated Remediation Strategy/Risk Assessment

This is a revised version of the original document issued in October 2022 completed by persons unknown, following objection by the Environment Agency, a statutory consultee of the Local Planning Authority. A letter response from the Environment Agency (reference NE/2022/135099/01-L01, dated 12<sup>th</sup> January 2023) highlighted that the original document submitted does not include the water environment as a receptor. A copy of the Environment Agency letter is appended.

Stantec UK Ltd (Stantec) have been engaged by New Ways Construction Ltd to firstly discuss the situation with the Environment Agency (video conference call held on 20<sup>th</sup> September 2023) and latterly to update/amend the previously issued remediation/ mitigation strategy document.

Stantec understand that currently site development has continued with enabling and groundworks completed, including clearance of the site, removal of underground fuel storage tanks, creation of piled foundations and construction of the superstructure.

This note relates to discharge of condition 2 and builds upon the Ground Conditions related work completed by Stantec in support of the planning application (ref 6/2020/3222/MAJ), namely the Phase 1 Ground Conditions Assessment and the Phase 2 Ground Investigation Report (August 2020) and that submitted by parties unknown in October 2022.

The update presented comprises the addition of groundwater (both shallow and deep) as an identified receptor/ pathway that was previously omitted.

The updated document, appended to this Technical Note, is referenced Comet Way, Hatfield - Revised Remediation Risk Matrix Oct 2023 FIN.

### Appended:

Comet Way, Hatfield - Revised Remediation Risk Matrix Oct 2023\_FIN. NE/2022/135099/01-L01 - EA Letter Response, 12<sup>th</sup> January 2023

### **DOCUMENT ISSUE RECORD**

Technical Note No	Rev	Date	Prepared	Checked	Approved
332610303/ 3501/TN001	01	19/10/23	O Belson	J Hallier	O Belson

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# Comet Way Development, Hatfield AL10 9TF

This is a revised version of the original document issued in October 2022, written by persons unknown, following objection by the Environment Agency, a statutory consultee. Following a video conference call with Ally Thomas (Environment Agency) on 20<sup>th</sup> September 2023, whereon reasons for the objection were made clear and a pathway to resolving the discharge of relevant conditions was discussed and agreed. This document relates to the discharge of Condition 2 (Oliver Belson, Senior Associate, Stantec UK Ltd, 18/10/2023).

The following has been prepared to follow advice and recommendations contained in the Stantec Phase 2 Ground Investigation Report 47179/3502 August 2020. It specifically relates to planning conditions **2** of planning approval 6/2020/3222/MAJ. It confirms that the recommendations in the report have been and will be accommodated in site operations and methods of construction and working.

#### **Previous Use**

The site has historically been used for the storage and retail sale of vehicle fuels including diesel and petrol. These fuels were stored in underground storage tanks, which have been decommissioned since the trade in fuel sales ceased. The tanks were identified in various locations and have been historically decommissioned and filled with concrete slurry or Basel foam. The remediation of the site includes the removal of these tanks and associated infrastructure.

#### **Contamination Risks**

The following have been identified as possible sources of contamination and will require remediation or preventative measures as stated below.

Operational Risk	Source	Pathway	Receptors	Risk Classification prior to Remediation	Mitigation	Risk Classification after Remediation
Risk 1 Contaminated materials in soil and risks to human health	Contaminated soils (made ground and natural soils contaminated by former use)	Direct contact, ingestion and inhalation of dusts/vapours (Physical handling of materials excavated during substructure construction)	On site construction staff	Moderate	<ul> <li>Excavated materials are independently tested to verify contamination levels</li> <li>Actions taken to ensure materials are correctly handled and disposed of, to registered landfill sites as required</li> <li>Materials are mechanically handled, no physical handling permitted on site</li> </ul>	Very low

Operational Risk	Source	Pathway	Receptors	Risk Classification prior to Remediation	Mitigation	Risk Classification after Remediation
Risk 2 Uptake by vegetation & ingestion	Contaminants in soil where vegetation is planted	Planted materials provide a pathway for contaminants to reach the surface	Future residents, visitors and maintenance staff	Moderate/Low	No private gardens provided within the development.     Soft landscaping is confined to localised areas where barrier material and clean imported growth media will be provided.     No edible species to be introduced as part of the soft landscaping proposal	None
Risk 3 Deep groundwater is contaminated with bromide & bromate	Contaminated groundwater in underlying Principal Aquifer (Chalk / Kesgrave Sand and Gravel) below the site  Existing pollution will be exacerbated by construction activities	Contaminated water rises through boreholes or piling shafts.  The quality of the water in the aquifer will be further degraded	On site staff Other offsite users Groundwater	Moderate	The foundation piling has been designed to accommodate and not penetrate the chalk aquifer.  The use of a low frequency CFA piling method and non-penetration of the chalk aquifer prevents further deterioration	Very Low
Risk 4 Services (water supplies)	Ground contamination	Contaminants enter the new potable water supply	Residential occupiers	Low	Potable water will be supplied to the site in barrier pipe to main cold water storage tanks     Cold water distribution will be undertaken above ground level through lateral and riser arrangements	None
Risk 5 Fuel storage tanks	Ground contamination	Contaminants enter the water supply and/or adjacent soil or vertically migrate to groundwater (shallow and deep)	Residential occupiers and maintenance staff Groundwater	Moderate	Fuel storage tanks will be removed from site and disposed of at approved locations     Tanks are opened on site and materials removed from site.     Independent testing of soil material from the proximity of the tank removal(s)     The site is encapsulated with tarmacadam and paving surfaces for car parking and pedestrian access	None

Operational Risk	Source	Pathway	Receptors	Risk Classification prior to Remediation	Mitigation	Risk Classification after Remediation
Risk 6 Vertical Migration of contamination in unsaturated soil	Soil Contamination	Contaminants in soil across the site vertically migrate to groundwater (shallow and deep) via infiltration of incident rainfall/surface water	Groundwater	Moderate	The site is encapsulated with tarmacadam and paving surfaces for car parking and pedestrian access removing potential infiltration of surface water.  Former Fuel Storage Tanks to be removed including localised contaminated soils. Excavation to be independently verified.  The use of a low frequency CFA piling method and non-penetration of the chalk aquifer prevents creation of pathway to deeper, sensitive groundwater	None
Risk 7 Ground Gases	Ground gases from made ground beneath the site	Release from disturbed soil	Residential occupiers and maintenance staff	Low	The ground floor is non-residential and will be utilised for car parking The under-croft car parking areas will be naturally cross ventilated to ensure air flow and permit dissipation of any gases. Ground gas assessment undertaken previously identified Characteristic Situation CS1.	None

## Verification - Materials sampling

Materials that are excavated for removal will be sampled by laboratory analysis to determine if they are to be classified as waste and removed to specialist landfill sites. This includes materials will be sampled from pile arisings and reduced level digs where these are undertaken.

### **END REPORT**

## creating a better place



David Elmore
Welwyn-Hatfield District Council
Development Control
The Campus
Welwyn Garden City
Hertfordshire
Al 8 6AF

Our ref: NE/2022/135099/01-L01 Your ref: 6/2022/2493/COND

Date: 12 January 2023

Dear David

Former Volkswagen Van Centre, Comet Way, Hatfield, AL10 9TF

Submission of details pursuant to conditions 2 (remediation strategy), 3 (ground investigation measures) & 4 (ground contamination) on planning permission 6/2020/3222/MAJ

Thank you for consulting us on this application. We have reviewed the information online specifically; Residential Development Comet Way, Hatfield AL10 9TF Conditions Compliances 2,3 & 4 Rev.00 31 October 2022 Issued for Planning Condition/s Compliance Author: Francis Jackson.

We are currently unable to recommend the discharge of the planning conditions 2, 3 and 4 based on the submitted information.

The Remediation part of the submitted document doesn't include the water environment as a receptor.

Please provide an assessment of the risks of contamination posed to the water environment, both upper and lower aquifers, including any necessary remedial measures and a verification plan to satisfy condition 2.

Please note that condition 3 can only be discharged once the remedial work is complete. Condition 4 can only be discharged once construction, in particular all groundwork, is complete.

Should you have any queries please contact me.

Yours sincerely

Mr Kai Mitchell Sustainable Places Planning Specialist

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