

David Elmore
Welwyn-Hatfield District Council
Development Control
The Campus
Welwyn Garden City
Hertfordshire
AL8 6AE

Our ref: NE/2023/136338/02
Your ref: 6/2023/2173/COND
Date: 27 March 2024

Dear David,

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

Submission of Details Pursuant to Condition 8 (Piling/Other Foundation Designs) on Planning Permission 6/2020/3222/MAJ

Thank you for consulting us on the above application on 7 March 2024. As part of the consultation, we have reviewed and considered the following documents:

- **Project: VW Hatfield, Comet Way.** Subject: Specification for a Ground Investigation and Monitoring Programme. Date: 6 February 2024. Prepared for New Ways Construction Limited by Stantec UK Ltd. Reference: 332610303-SP-3501-V02. 'Specification for a Ground Investigation and Monitoring Programme', prepared by Stantec, dated 6 February 2024 (ref: 332610303-SP-3501-V02).
- 'Technical Note: Objection - Condition 8 – Foundation Piling Depths', prepared by Stantec, dated 19 October 2023 (Job no.: 332610303, Note no.: TN002).

Environment Agency Position

We previously recommended the discharge of Condition 8 (Piling/Other Foundation Designs) in our response dated 6 December 2023 under ref. NE/2023/136338/01.

The applicant has now submitted a revised Ground Investigation and Monitoring Programme, as referenced above. Based on review of this document we are now **unable to recommend the discharge of the Condition 8 (Piling/Other Foundation Design)** and require further information to satisfy our concerns, the details of which can be found below.

This position is in line with the Welwyn Hatfield Borough Council Local Plan, adopted October 2023, paragraph 12.63, and paragraph 180 of the National Planning Policy Framework (NPPF).

Reasons

Although the proposed works will provide information as to whether the subsequent piling works have exacerbated the pollution in the deeper aquifer, borehole installation itself can increase the risk of polluting the aquifer.

In order to manage this risk effectively, we require a borehole management plan which will adequately monitor and evaluate the installation, management and

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decommissioning of the monitoring boreholes. The scheme shall provide details of:

- How the monitoring boreholes will be installed and what measures will be taken to ensure there is no cross-contamination between the shallow and deep aquifers.
- How the monitoring boreholes will be secured, protected and inspected, whilst they are operational.
- How the monitoring boreholes will be decommissioned once we are satisfied that no further work is necessary to protect the groundwater quality. The timing of decommissioning will depend upon the monitoring results.

The results and associated report should include comparison to other local monitoring for bromate, bromide and groundwater level.

If these boreholes are not installed, managed or decommissioned correctly, this may result in risks to groundwater quality from, for example, pollution/turbidity, risk of mobilising contamination, drilling through different aquifers and creating preferential pathways for contaminant movement.

Next Steps

Once adequate detail has been given regarding the above points, we will be able to reassess the application to discharge Condition 8 (Piling/Other Foundation Designs).

Pre-application advice

We strongly encourage applicants to seek our pre-application advice to ensure environmental opportunities are maximised and to avoid any formal objections from us. If the applicant had come to us, we could have worked with them to resolve these issues prior to submitting their planning application. The applicant is welcome to seek our advice now to help them overcome our objection via HNL SustainablePlaces@environment-agency.gov.uk.

Further information on our charged planning advice service is available at; <https://www.gov.uk/government/publications/planning-advice-environment-agency-standard-terms-and-conditions>.

Final comments

Thank you for contacting us regarding the above application. Our comments are based on our available records and the information submitted to us. Please quote our reference number in any future correspondence.

If you have any questions, please email me at HNL SustainablePlaces@environment-agency.gov.uk, quoting the reference at the beginning of this letter.

Yours sincerely,

Lauren Clayton-Spencer
Planning Advisor

Email: HNL SustainablePlaces@environment-agency.gov.uk
Direct Dial: 020 3025 0962