

Welwyn Hatfield Borough Council,  
The Campus,  
Welwyn Garden City,  
Herts  
AL8 6AE

Reference Number: 6/2021/3422/MAJ

14 April 2022

Dear Madam/Sir

**DESCRIPTION:** Erection of 1 x building containing 3 x flats, 11 x offices and 1 x retail unit (Use Class E), erection of 5 x terrace houses with parking and associated works, involving demolition of existing shopping parade with 7 x maisonettes above, alterations to existing parking area and erection of a parking area

**LOCATION:** Salisbury Square Hatfield AL9 5AD

Thank you for notification of the above planning application. Planning applications are referred to us where our input on issues relating to water quality or quantity may be required.

You should be aware that the proposed development site is located within an area that is impacted by Bromate contamination.

Our main concern is the potential for deep excavation works for foundations and drainage (e.g. soakaways) to require penetration through the Lowestoft formation creating a pathway between to two aquifers, **which must be avoided**. The Bromate plume is present in the upper aquifer and connections between the two risk the migration of bromate plume into the Chalk/lower aquifer towards other abstractions.

We ask that the above concern is considered throughout further plans of the development and for the following conditions are implemented:

## 1. Contamination

Any works involving excavations that penetrate into the Lowestoft formation should be avoided. If these are necessary, then the following condition needs to be implemented:

Condition

- A)** No works involving excavations shall be carried until the following has been submitted to and approved in writing by the Local Planning Authority in conjunction with Affinity Water:
- i)** An **Intrusive Ground Investigation** to identify the current state of the site and appropriate techniques to avoid displacing any shallow contamination to a greater depth.
  - ii)** A **Risk Assessment** identifying both the aquifer and the abstraction points as potential receptors of contamination.
  - iii)** A **Method Statement** detailing the **depth** and **type** of excavations (e.g. piling) to be undertaken including **mitigation measures** (e.g. appropriate piling design, off site monitoring boreholes etc.) to prevent and/or minimise any potential migration of pollutants to public water supply. Any excavations must be undertaken in accordance with the terms of the approved method statement.

**Reason:** Excavation works into the Lowestoft formation have the potential to cause migration of contaminants into the lower aquifer and towards public water supply abstractions. This can cause critical abstractions to switch off resulting in the immediate need for water to be sourced from another location, which incurs significant costs and risks of loss of supply.

## 2. Contamination during construction

Construction works may exacerbate any known or previously unidentified contamination. If any pollution is found at the site, then works should cease immediately and appropriate monitoring and remediation will need to be undertaken to avoid any impact on water quality in the chalk aquifer.

### Condition

- B)** If, during development, contamination not previously identified is found to be present at the site, then no further development shall be carried out until a **Remediation Strategy** detailing how this contamination will be dealt with has been submitted to and approved in writing by the Local Planning Authority in conjunction with Affinity Water. The remediation strategy shall be implemented as approved with a robust pre and post monitoring plan to determine its effectiveness.

**Reason:** To ensure that the development does not contribute to unacceptable concentrations of pollution posing a risk to public water supply from previously unidentified contamination sources at the development site and to prevent deterioration of groundwater and/or surface water.

## 3. Infiltration

Surface water should not be disposed of via direct infiltration into the ground via a soakaway due to the potential impact that could be caused to the bromate plume.

### Condition

- C) Prior to the commencement of development, details of a Surface Water **Drainage Scheme** that **does not include infiltration** shall be submitted to and approved in writing by the Local Planning Authority in conjunction with Affinity Water.

**Reason:** To provide confirmation that direct infiltration via soakaways will not be used due to the potential presence of contamination and the risk for contaminants to migrate causing further groundwater pollution, potentially impacting public water supply.

The construction works and operation of the proposed development site should be done in accordance with the relevant British Standards and Best Management Practices, thereby significantly reducing the groundwater pollution risk.

For further information we refer you to CIRIA Publication C532 "Control of water pollution from construction - guidance for consultants and contractors".

### **Water efficiency**

Being within a water stressed area, we expect that the development includes water efficient fixtures and fittings. Measures such as rainwater harvesting and grey water recycling help the environment by reducing pressure for abstractions in chalk stream catchments. They also minimise potable water use by reducing the amount of potable water used for washing, cleaning and watering gardens. This in turn reduces the carbon emissions associated with treating this water to a standard suitable for drinking, and will help in our efforts to get emissions down in the borough.

### **Infrastructure connections and diversions**

There are potentially water mains running through or near to part of proposed development site. If the development goes ahead as proposed, the developer will need to get in contact with our Developer Services Team to discuss asset protection or diversionary measures. This can be done through the My Developments Portal (<https://affinitywater.custhelp.com/>) or [aw\\_developerservices@custhelp.com](mailto:aw_developerservices@custhelp.com).

In this location Affinity Water will supply drinking water to the development. To apply for a new or upgraded connection, please contact our Developer Services Team by going through their My Developments Portal (<https://affinitywater.custhelp.com/>) or [aw\\_developerservices@custhelp.com](mailto:aw_developerservices@custhelp.com). The Team also handle C3 and C4 requests to cost potential water mains diversions. If a water mains plan is required, this can also be obtained by emailing [maps@affinitywater.co.uk](mailto:maps@affinitywater.co.uk). Please note that charges may apply.

Thank you for your consideration.

Yours sincerely

# AffinityWater

Taking care of your water

Laurence Chalk

Catchment Officer

Catchment Management

[planning@affinitywater.co.uk](mailto:planning@affinitywater.co.uk)

[laurence.chalk@affinitywater.co.uk](mailto:laurence.chalk@affinitywater.co.uk)