

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

Reference Number: 6/2022/1853/MAJ

14 March 2023

Dear Madam/Sir,

DESCRIPTION: Construction of a 4,012sqm extension to the existing warehouse space (Use Class E) with associated plant and works including the relocation of a bicycle shelter, re-routed internal access road and landscaping

LOCATION: Eisai Europe Limited, European Knowledge Centre, Mosquito Way, Hatfield, AL10 9SN

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 Environment Agency defined groundwater Source Protection Zone (SPZ) corresponding to our Pumping Station (HATF). This is a public water supply, comprising a number of Chalk abstraction boreholes, operated by Affinity Water Ltd. You should also be aware that the proposed development site is located within an area that is impacted by Bromate contamination.

Following discussions with the applicant, we no longer object to this planning application subject to the strict implementation, management and monitoring of the following conditions being attached to any permission granted.

The following conditions are required to prevent a pathway between upper and lower aquifers which would risk the migration of the bromate plume.

1. Prior to the commencement of development approved by this planning permission, the following components of a scheme to deal with the risks associated with contamination of the site shall each be submitted to and approved, in writing, by the local planning authority in consultation with Affinity Water:

i) A site investigation scheme in accordance with the ground investigation technical note dated 02/03/23 as discussed (EML Facility Expansion GI Technical Note by AECOM), to provide information for a detailed assessment of the risk to all receptors that may be affected, including those off site. This should include an assessment of the potential risks to: human health, property (existing or proposed) including buildings, crops, pests, woodland and service lines and pipes, adjoining land, ground waters and surface waters, ecological systems, archaeological sites and ancient monuments. In particular, the site investigation shall determine:

- The depth and thickness of the clay aquitard layer between the upper and lower aquifers;
- Monitoring of the bromate groundwater concentrations in the upper and lower aquifers; and
- A risk assessment of the potential for a piled foundation solution to connect the upper and lower aquifers and the potential impact on water quality, with focus on Bromate.

ii) The site investigation results and the detailed risk assessment and, based on these, an options appraisal and remediation strategy giving full details of the remediation measures required and how they are to be undertaken. Should the approved development require piled foundations, the results of the site investigation will inform the pile design and Foundation Works Risk Assessment, subject of condition [2].

iii) A verification plan providing details of the data that will be collected in order to demonstrate that the works set out in (ii) are complete and identifying any requirements for longer term monitoring of pollutant linkages, maintenance and arrangements for contingency action. Any changes to these components require the express consent of the local planning authority. The scheme shall be implemented as approved.

2. Should the approved development require piled foundations, no piling shall take place in connection with the development until a Piling Method Statement and Foundation Works Risk Assessment (FWRA) have been submitted to and approved in writing by the Local Planning Authority in consultation with Affinity Water.

The Piling Method Statement should include:

- The total depth and type of piling to be undertaken;
- The piling methodology;
- Measures to prevent and minimise the potential for mobilising contaminants; and
- The programme for works.

The FWRA should include:

- Risk based analysis of the following pollution scenarios:
 - Creation of preferential pathways, through the low permeability layer (aquitard), to allow potential contamination of the underlying aquifer
 - Creation of preferential pathways, through the low permeability layer (aquitard), to allow upward migration of contamination to the overlying aquifer
 - The driving of solid contaminants into an aquifer during pile driving
 - Contamination of groundwater by concrete, cement paste or grout
- The risk assessment will cover the site specific scenario/condition (mentioned above), potential pollution considerations, risk assessment, potential risk, mitigation measures and residual risk level.

In the event the FWRA indicates an unacceptable risk of the creation of a bromate pathway through the clay aquitard layer to the upper gravels, an alternative solution that does not require piling through the clay aquitard layer must be sought, details of which must be approved in writing by the Local Planning Authority in consultation with Affinity Water prior to development commencing.

Any piling must be undertaken in accordance with the approved Piling Method Statement and FRWA.

3. Following completion of measures identified in the approved remediation scheme and prior to the first use or occupation of the development, a verification report that demonstrates the effectiveness of the remediation carried out must be produced together with any necessary monitoring and maintenance programme and copies of any waste transfer notes relating to

exported and imported soils shall be submitted to the Local Planning Authority for approval. The approved monitoring and maintenance programme shall be implemented.

4. Prior to the commencement of development, details of a Surface Water Drainage Scheme should be provided that prevents contamination of any public water supply abstractions present. This shall be submitted to and approved in writing by the Local Planning Authority in consultation with Affinity Water.

Reason: Surface water drainage can mobilise contaminants into the aquifer through infiltration in areas impacted by ground contamination. Surface water also has the potential to become contaminated and can enter the aquifer through open pathways, either created for drainage or moved towards existing open pathways where existing drainage has reached capacity. All have the potential to impact public water supply.

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.

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. 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. Please note that charges may apply.

Thank you for your consideration.

Yours faithfully,

Laurence Chalk
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