

Mr David Elmore
Welwyn Hatfield Borough Council
The Campus
Welwyn Garden City
Herts
AL8 6AE

Reference Number: 6/2022/2300/COND

1st November 2022

Dear Mr Elmore,

DESCRIPTION: Submission of details pursuant to condition numbers - 1 (Construction Management Plan), 5 (Surface Water Strategy), 6 (Surface Water Scheme), 7 (Drainage), 8 (Foundation), 9 (Design Plan), 10 (Accessible Housing Scheme), 11 (Highway Improvement), 12 (Samples), 13 (Hard Landscaping), 14 (Soft Landscaping), 15 (Hard landscaping - roof garden), 16 (external lighting), 17 (Cycle Store), 18 (Cycle Store under-croft/Open air), 19 (Balcony Screens), 20 (Energy & Sustainability Statement), 21 (PV Cells Plan), 22 (Bat & Bird Boxes), 23 (Noise Compliance), 24 (Noise Compliance), 26 - (SuDS), 27 (Access), 28 (EV Charging Points), 29 (Parking), 30 (Bin Stores), 31 (Roof Gardens), on planning permission 6/2020/3222/MAJ

LOCATION: Beadles Volkswagen Van Centre, Harpsfield Broadway, Hatfield, AL10 9TF

Thank you for notification of the above planning application. We are writing to object to the discharge of condition 8 of planning permission 6/2020/3222/MAJ.

The proposed piling depth does not consider the risk of Bromate contamination to the Upper Gravels (Lowestoft Formation) and/or the diversion of the bromate plume present in the Lower Gravels/Chalk Formations.

The Upper Gravels (Lowestoft Formation) are hydraulically separated from the Lower Gravels (Kesgrave sub-catchment Group) and Chalk, due to Boulder Clay being present in the wider area between the depths of ~66mAOD and ~59.5mAOD. Bromate contamination is present in the Lower Gravels and Chalk (Principal aquifer) but not the Upper Gravels (Secondary aquifer).

Our concern is that the current proposed piling depth of 15.5m finishes at the base of the Clay and so, risks connecting hydraulically the Lower Gravels and Chalk to the Upper Gravels. This has a high risk of creating a pathway for upward migration of Bromate to the Upper Gravels. This represents a significant a pollution risk to third party sources, nearby surface water features, environmental systems linked to the Upper Gravels and bypassing active scavenging boreholes in the Chalk. Piling at this depth also has the potential to alter the flow direction in the Lower Gravels/Chalk, causing local diversion of the bromate plume which can undermine the scavenging activity undertaken by Affinity Water.

In order to consider removing our objection to condition 8, we would require that piling does not exceed a depth of 62mAOD (a minimum of 2m above the base of the Boulder Clay based on the limited information available from the two onsite borehole logs). We would expect that once the piling method statement has been updated, we would get the opportunity to review prior to discharging condition 8.

Please note that we will comment on conditions 6 and 7 on or before the deadline of 09/11/2022.

Thank you for your consideration.

Yours sincerely,

James Kenyon
Senior Asset Scientist (Planning)
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