

Raymond Lee  
Welwyn-Hatfield District Council  
Development Control  
The Campus  
Welwyn Garden City  
Hertfordshire  
AL8 6AE

**Our ref:** NE/2021/133616/01-L01  
**Your ref:** 6/2021/2260/FULL  
**Date:** 9 September 2021

Dear Raymond,

**Shell Welwyn Garden City Stanborough Road Welwyn Garden City, AL8 6XA.**

**Redevelopment of petrol station; including demolition of existing sales building, canopy link and car wash/jet washes, erection of a new sales building, provision of car parking spaces, provision of EV charging bays and associated plant, erection of a new bin store, retention of forecourt and canopy, and associated works.**

Thank you for consulting us on the above application on 23 August 2021. As part of this consultation we have reviewed the following documents:

- Preliminary (Phase 1) site assessment report –Project no. 305095 R01, dated October 2019.
- Proposed Site Layout – Artelia / MBH drawing no. 12038629, dated 28 June 2021.

### **Environment Agency Position**

Based on the information submitted to date, we **object** to the planning application and recommend planning permission is refused.

### **Reasons**

The use of the site as a petrol filling station presents a high risk of contamination that could be mobilised during construction to pollute controlled waters.

Controlled waters are particularly sensitive at this location because the site:

- lies within a Source Protection Zone 3 (SPZ3)
- is underlain by a Secondary A Superficial aquifer (Kesgrave Catchment Subgroup) and a Principal Bedrock aquifer (Chalk)
- lies within a Water Framework Directive Groundwater body with 'poor' classification (Upper Lee Chalk GB40601G602900)

The document "*Proposed Site Layout*", drawing no. 12038629, indicates a new substation is proposed as part of the redevelopment proposals. We note that this has not been discussed in the Preliminary (Phase 1) site assessment report. As such, all potential on-site sources of contamination associated with the redevelopment have not been considered in the initial Conceptual Site Model (CSM).

Cont/d..

Therefore, the applicant has not yet supplied adequate information to demonstrate that the risks posed to groundwater resources can be satisfactorily managed.

This objection is in line with paragraph 174 of the National Planning Policy Framework, in addition to Policies R2 (Contaminated Land) and R7 (Protection of Ground and Surface Water) of the Welwyn Hatfield Local Plan.

### **Overcoming our Objection**

The CSM outlined in Section 3 of the submitted Preliminary (Phase 1) site assessment report should be updated to include the proposed substation as a potential source of contamination, alongside discussion of possible contaminant pathways and risks to controlled waters receptors arising from the proposed substation.

Please re-consult us with the revised version of Preliminary (Phase 1) site assessment once the above updates have been made.

### **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. Please provide us with a copy of the decision notice for our records. This would be greatly appreciated.

**If you are minded to approve the application contrary to our objection, I would be grateful if you could re-notify us to explain why, and to give us the opportunity to make further representations.**

Should you have any queries regarding this response, please contact me.

Yours sincerely,

**George Goodby**  
**Sustainable Places Planning Advisor**

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