

Mark Peacock  
Welwyn-Hatfield District Council  
Development Control  
The Campus  
Welwyn Garden City  
Hertfordshire  
AL8 6AE

**Our ref:** NE/2018/128791/01-L01  
**Your ref:** 6/2018/1635/OUTLINE  
**Date:** 12 July 2018

Dear Mark

**Outline permission for the change of use of land to airfield with runway and support facilities.**

**Historic de Havilland grass runway, Ellenbrook Fields, Hatfield Business Park, Hatfield.**

Thank you for consulting us on the above application. We **object** to the planning application, as submitted, because the risks to groundwater from the development are unacceptable. The applicant has not supplied adequate information to demonstrate that the risks posed to groundwater can be satisfactorily managed and therefore, we recommend that planning permission should be refused on this basis.

**Reasons**

The National Planning Policy Framework paragraph 109 states that the planning system should contribute to and enhance the natural and local environment by preventing both new and existing development from contributing to or being put at unacceptable risk from, or being adversely affected by unacceptable levels water pollution. This is also in line with your local plan policy R7 'Protection of Ground and Surface Water'.

In this instance the applicant has failed to provide this information and we consider that the proposed development may pose an unacceptable risk of causing a detrimental impact to groundwater quality. To ensure development is sustainable, applicants must provide adequate information to demonstrate that the risks posed by development to groundwater can be satisfactorily managed.

The proposed site overlies groundwater that is polluted with bromate and bromide. The adjacent, existing CEMEX Hatfield quarry and proposed Bretts 'Ellenbrook' quarry (aka Hatfield Aerodrome quarry) are both required to closely monitor groundwater level and groundwater quality in order to demonstrate that their activities do not significantly change the existing groundwater flow regime, which might cause the groundwater plume of bromate and bromide to move. Any proposed use for this site must demonstrate the same, in proportion to the activities.

Cont/d..

Furthermore, the site is potentially affected by contamination due to its previous use as a commercial and military aerodrome. I anticipate that the aspects of the proposal that could potentially mobilise shallow contamination and/or affect the groundwater are:

- construction activities (hangars, clubhouse, access road, parking area, associated services etc)
- fire service area
- infiltration drainage of surface water from roofs and areas of impermeable hard standing
- infiltration of sewerage
- interference with groundwater monitoring and mitigation measures for the adjacent/overlapping Bretts Ellenbrook quarry (aka Hatfield aerodrome).

Our approach to groundwater protection is set out in Groundwater Protection: Principles and Practice. In implementing the position statements in this guidance we will oppose development proposals that may pollute groundwater especially where the risks of pollution is high and the groundwater asset is of high value. Groundwater is particularly sensitive in this location due to the need to avoid exacerbating the existing groundwater pollution.

### **Overcoming our objection**

In accordance with our Groundwater Protection: Principles and Practice we will maintain our objection until we receive a satisfactory risk assessment that demonstrates that the risks to groundwater posed by this development can be satisfactorily managed.

We recommend that developers should:

1. Follow the risk management framework provided in CLR11, Model Procedures for the Management of Land Contamination, when dealing with land affected by contamination.
2. Refer to the [Environment Agency Guiding principles for land contamination](#) for the type of information that we required in order to assess risks to controlled waters from the site. The Local Authority can advise on risk to other receptors, such as human health.
3. Consider using the [National Quality Mark Scheme for Land Contamination Management](#) which involves the use of competent persons to ensure that land contamination risks are appropriately managed.
4. Refer to the [contaminated land](#) pages on GOV.UK for more information.

### **Advice to applicant - Flood Risk Activity Permit**

Under the terms of the Environmental Permitting Regulations a Flood Risk Activity Permit is required from the Environment Agency for any proposed works or structures, in, under, over or within 8 metres of the top of the bank of the Nast or Ellenbrook, both of which are designated as 'main river'. Details of lower risk activities that may be excluded or exempt from the Permitting Regulations can be found at [www.gov.uk/guidance/flood-risk-activities-environmental-permits](http://www.gov.uk/guidance/flood-risk-activities-environmental-permits). Please contact us at [PSO-Thames@environment-agency.gov.uk](mailto:PSO-Thames@environment-agency.gov.uk).

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

Yours sincerely

**Lisa Mills**

**Sustainable Places Planning Advisor**

Direct dial 0208 4748770

E-mail [HNLsustainableplaces@environment-agency.gov.uk](mailto:HNLsustainableplaces@environment-agency.gov.uk)