

creating a better place

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AL8 6AE



**Our ref:** NE/2018/129287/01-L01  
**Your ref:** 6/2018/2387/MAJ  
**Date:** 1 November 2018

Dear Louise,

**37 Broadwater Road, Welwyn Garden City, Hertfordshire, AL7 3AX**

**Construction of new build of 22 x 2 bedroom and 2 x 3 bedroom residential apartments with balconies and roof garden, layout of 26 car parking spaces, cycle parking, refuse store, internal access routes, landscaping and supporting infrastructure.**

Thank you for consulting us on the above application. The submitted documents suggest potentially contaminated land, and the site is situated in Source Protection Zone 3. Whilst we have **no objection** to the proposed development, we recommend that the applicant considers risks to groundwater by following the advice outlined below.

We are currently operating with a significantly reduced resource in our Groundwater and Contaminated Land Team in Hertfordshire and North London Area. This has regrettably affected our ability to respond to Local Planning Authorities for some planning consultations. We are not providing specific advice on the risks to controlled waters for this site as we need to concentrate our local resources on the highest risk proposals. We recommend however that the requirements of the National Planning Policy Framework and National Planning Policy Guidance (NPPG) are still followed. This means that all risks to groundwater and surface waters from contamination need to be identified so that appropriate remedial action can be taken. This should be additional to the risk to human health that your Environmental Health Department will be looking at.

We expect reports and Risk Assessments to be prepared in line with our 'Groundwater protection: Principles and practice' document (commonly referred to as GP3) and CLR11 (Model Procedures for the Management of Land Contamination). More information can be found here; <https://www.gov.uk/government/publications/groundwater-protection-principles-and-practice-gp3>.

In order to protect groundwater quality from further deterioration:

- No infiltration based sustainable drainage systems should be constructed on land affected by contamination as contaminants can remobilise and cause groundwater pollution.
- Piling or any other foundation designs using penetrative methods should not cause preferential pathways for contaminants to migrate to groundwater and cause pollution.

Cont/d..



- Decommission of investigative boreholes to ensure that redundant boreholes are safe and secure, and do not cause groundwater pollution or loss of water supplies in line with paragraph 170 of the National Planning Policy Framework.

The applicant should refer to the following sources of information and advice in dealing with land affected by contamination, especially with respect to protection of the groundwater beneath the site:

- From [www.gov.uk](http://www.gov.uk):
  - Groundwater Protection: Principles and Practice (August 2013)
  - Our Technical Guidance Pages, which includes links to CLR11 (Model Procedures for the Management of Land Contamination) and GPLC (Environment Agency's Guiding Principles for Land Contamination) in the 'overarching documents' section
  - Use MCERTS accredited methods for testing contaminated soils at the site
- From the National Planning Practice Guidance:
  - Land affected by contamination
- British Standards when investigating potentially contaminated sites and groundwater:
  - BS5930:2015 Code of practice for site investigations;
  - BS 10175:2011 A1:2013 Code of practice for investigation of potentially contaminated sites;
  - BS ISO 5667-22:2010 Water quality. Sampling. Guidance on the design and installation of groundwater monitoring points;
  - BS ISO 5667-11:2009 Water quality. Sampling. Guidance on sampling of groundwaters (A minimum of 3 groundwater monitoring boreholes are required to establish the groundwater levels, flow patterns and groundwater quality.)

All investigations of land potentially affected by contamination should be carried out by or under the direction of a suitably qualified competent person. The competent person would normally be expected to be a chartered member of an appropriate body (such as the Institution of Civil Engineers, Geological Society of London, Royal Institution of Chartered Surveyors, Institution of Environmental Management) and also have relevant experience of investigating contaminated sites.

You may wish to 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.

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

Yours sincerely

**Stuart Cook**  
**Sustainable Places Planning Advisor**

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