

By email to: planning.policy@stalbens.gov.uk

Local Plans team
St Albans City & District Council
Civic Centre
St Peter's Street
St Albans
Hertfordshire, AL1 3JE

8 August 2025
My Ref: 23/315

Dear sir/madam,

**RE: ST ALBANS LOCAL PLAN EXAMINATION 2025 – ADDITIONAL DOCUMENTS CONSULTATION
SADC/ED77 – FLOOD RISK ADDENDUM
SITE M20 – LAND AT LOWER LUTON ROAD, HARPENDEN**

Thank you for the opportunity to comment on the additional documents published on 4 July 2025. I write in response to the Flood Risk Addendum, ref SADC/ED77, and specifically in relation to groundwater flooding.

As you are aware, DLA Town Planning acts for Jarvis Homes, who are the promoters of Land at Lower Luton Road – proposed housing allocation M20 in the submitted draft Local Plan. Jarvis Homes are working with the landowners to bring forward a residential development on the site and you may have seen the recent pre-application submission we made, seeking the Council's comments on our emerging layout.

Paragraph 3.3.2 of the Council's Strategic Flood Risk Assessment (SFRA) Level 1 addendum published in 2024 highlights that limited information is available on groundwater flooding. The lack of available data means that it is not possible to provide an equivalent level of analysis to that provided for river flooding, for example. While the Council's consultants have done their best to fill the void, Appendix B for the SFRA Level 1 Addendum highlights the caveats that come with their work:

"Due to the limitations of this dataset, it could not be used with confidence unless supported by more detailed local studies. The mapping provides an indication of where risk might be higher, but it would not be easy to defend sequential decisions based on the available mapping." (SFRA Level 1 addendum, Appendix B).

This heightened level of uncertainty is important. It is not appropriate, at this stage, for the Local Plan to specify the impact that groundwater flooding might have on development capacity, given the paucity of information. The estimates of capacity given for each proposed allocation are "indicative", so sufficient flexibility exists to vary capacity at a later stage.

We therefore object to the proposed reduction in capacity for site M20 from 25 to 12. The data does not support this reduction and is not sufficiently detailed to be reliable.

In contrast, Jarvis Homes are monitoring actual groundwater levels at the site through the installation of boreholes. The initial results are attached at Appendix A to this letter and are summarised by Infrastruct Consulting Civil Engineers. As can be seen, in July 2025 groundwater was encountered at just over 1m below ground level, which contrasts with the modelled results relied upon by the Council of 0 to 0.025m below ground level. We acknowledge these results are only a snapshot and Jarvis Homes will continue to monitor groundwater levels to establish any seasonal variations. However, at this stage, the evidence does not support the proposed reduction in development capacity.

A detailed Flood Risk Assessment will be required with any planning application and this would be the point at which the detailed impact of any groundwater flood risk will become clear. The capacity of the site can be established at that time.

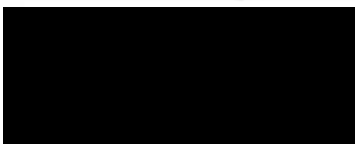
The SFRA Level 2 Addendum sets out a number of potential mitigation measures that should be considered. These are listed below with some initial commentary:

- Raising finished floor levels – as set out in Appendix A, finished floor levels will be higher than surrounding levels.
- Avoiding basements – no basements are proposed or envisaged.
- Potential limitations in the use of infiltration may mean SuDS features need to be larger – Jarvis Homes control a larger area of land beyond the proposed allocation (as set out in our Regulation 19 representations). If groundwater levels mean larger SuDS features are necessary, these can be accommodated elsewhere on the site, outside of the development area.

The proposed policy for site M20 should remain as per the submitted draft Local Plan.

We look forward to discussing this site with the Inspectors at the forthcoming hearing session. If there are any questions in the meantime, please feel free to contact me.

Yours faithfully



Simon Andrews
Strategic Planning Manager

Appendix A – Infrastruct CS Ltd response and Geo-site Assessment (WDE Consulting)



Infrastruct CS Ltd

Consulting Civil Engineers

Infrastruct CS Ltd
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28th July 2025

REF: 6017-LUTO-ICS-CO-C-03.003A

Lower Luton Road, Harpenden AL5 5ES (M20 in Draft Local Plan)

This statement has been prepared by Infrastruct CS Ltd to assist the M20 Land Promoter with the assessment of flood risk from different sources, including fluvial, pluvial and groundwater.

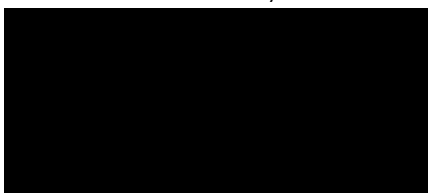
In this capacity, we have already assessed the results of some preliminary intrusive ground investigation carried out by WDE Consulting in May 2025 (Report Ref: 21372R1), and that can be found in Appendix A of this document. In there, groundwater was encountered in three different locations at 1.1m below ground level, far from the 0.025mbgl that the JBA Consulting map indicates.

Further testing was carried out by Lucion Ground Engineering Ltd in July 2025, (Report Ref: 136262), in two locations. In WS01, water rose to 1.05mbgl, approximately at 83.35mAOD. In WS02, water remained at 4.20mbgl, approximately at 83.50mAOD.

Based on these findings we believe a scheme close to the one submitted as part of a recent pre-application (See attached in Appendix B) could be feasible from a flood risk and drainage perspective. Especially if 4 of 5 houses are removed to provide a large above ground SuDs feature, and all finished floor levels are at 85.00mAOD or higher.

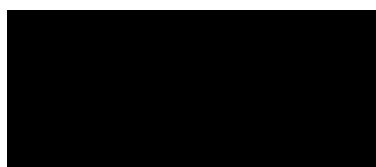
Extensive earthworks are necessary to provide accessible gradients to all footpaths and roads, and to maintain or even increase the floodplain volumes to the south, giving further protection to adjoining/neighbouring land. Proposed finished floor levels for all units will be higher than the surrounding levels as well. If our current findings are proven to be consistent in the winter, a scheme of approximately 30 dwellings should be achievable, albeit this may reduce once further data is available.

Yours sincerely



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Authorised by



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Appendix A

Geo-Site Assessment
Lower Luton Road
Harpenden
AL5 5AF

Client: Jarvis Strategic Land Ltd

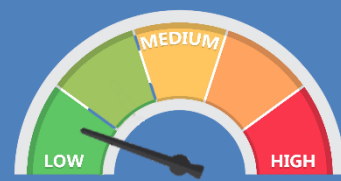
Issue Date: May 2025
Report Ref: 21372R1 (Issue A)



DRAINAGE



CONTAMINATION



Document verification schedule				
Project Name	Lower Luton Road, Harpenden, AL5 5AF			
Document title	Geo-Site Assessment			
Document ref	21372R1 (Issue A)			
Date of Issue	May 2025			
Comments	Issued to client			
	Prepared by	Checked by	Quality Check	Approved by
Name	Charlotte Bird	Jason Fitzgerald	Corrienne Ainscough	Simon Ware
Position	Graduate Consultant	Principal Consultant	Business Manager	Managing Director
Date	May 2025	May 2025	May 2025	May 2025

This report has been prepared in accordance with the scope of WDE Consulting Ltd's (WDE) appointment with the Client for this project and is subject to the terms of the appointment. It includes confidential information for only the Client's benefit and shall not be relied upon or transferred to any third party without the express written authorisation of WDE. If an unauthorised third party comes into possession of this report, they rely on it at their peril and WDE owe them no duty of care and skill.

WDE has prepared this report with reasonable skill, care and diligence in accordance with the current guidance and common practice at the time of issue. It represents a limited assessment which may fail to identify potential hazards outside the agreed areas that have been assessed. Groundwater levels are particularly susceptible to variations due to seasonal or other effects and hence any comments relating to groundwater are limited to the dates they were obtained. The subsurface geological profiles and other plots are generalised by necessity and have been based on the information found at the locations of the exploratory holes and depths sampled and tested. Interpretation of the results contained within this document are based on the proposed site usage and the findings may not be valid should the proposed land use and/or the regulatory regime/guidance change. The findings and opinions conveyed via this document are based on information obtained from a variety of sources as detailed within this report, which WDE Consulting Limited believes are reliable. Nevertheless, WDE Consulting Limited cannot and does not guarantee the authenticity or reliability of the information it has relied upon. In preparing this report, it has been assumed that all past and present occupants have provided all relevant and other information, especially relating to known or potential hazards.

WDE believes that providing information about limitations is essential to help the client identify and thereby manage their risks. These risks can be mitigated, but they cannot be eliminated, through additional assessments. WDE will on request, advise the client of the additional assessment opportunities available, their impact on risk, and their potential cost benefit. It should be noted that WDE does not provide legal advice, and the advice of lawyers may also be required.

The work is also subject to WDE Consulting's standard terms and conditions.

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Relevant Guidance and Legislation

APPENDIX B

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APPENDIX C

Environmental Database

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Field Logs

APPENDIX E

Permeability Sheets

1.0 EXECUTIVE SUMMARY

Phase 1 Desk Study	Comments	Risk Rating
Site Setting	Open field used as a garden area and set within curtilage of residential dwelling Forge Cottages	Low
Published Geology and Hydrogeology	<ul style="list-style-type: none"> Bedrock geology: Lewes Nodular Chalk Formation and Seaford Chalk Formation (Principal Aquifer, SPZ 3). Superficial geology: Kesgrave Catchment and Alluvium (Secondary A aquifer) 	Moderate
Hydrology/Flood Risk	<ul style="list-style-type: none"> River Lea located adjacent S. High risk of flooding. Flood Zone 2 & 3 1no potable abstraction 977m SW 	High
Historical land use	Open field since 1879 until c1980 when Forge Cottages shown. Minor alterations until present day. Surface of Water 18 th February 1922 on 1922 map.	Low
Landfill/Infilled land	<ul style="list-style-type: none"> No landfill within 250m of site Sand pit c1922 and c1948 onsite Refuse heap c1922 and c1946 onsite Gravel pit within 20m of site 	Low/moderate
Radon	<ul style="list-style-type: none"> Majority of site is within a low risk area (<1%) NW corner within 3-5% risk area requiring basic protection 	Low/moderate
Ground Cavities	<ul style="list-style-type: none"> Moderate risk area Solution pipe x 3 located 313m SW 	Moderate
UXO	Moderate risk	Moderate
Phase 2 Intrusive	Comments	Risk Rating
Proven Ground Conditions	<ul style="list-style-type: none"> Topsoil to ~0.20mbgl over gravelly Clay to 1.10mbgl. 	
Groundwater/Drainage	<ul style="list-style-type: none"> Groundwater encountered at 1.10m bgl. BRE365 soakage value range of 1.07E-05 to 3.64E-06 m/sec (moderate/poor to poor) within the gravelly clay. 	Moderate/High
Conclusions and Recommendations	<ul style="list-style-type: none"> Low/moderate risk from contamination for potential future receptors Report to be forwarded to planning Preliminary UXO assessment to be undertaken Radon report undertaken for northwest corner 	

2.0 INTRODUCTION

WDE Consulting Limited (WDE) was appointed by Jarvis Strategic Land Ltd (the *client*) to conduct a Geo-Site Assessment at Lower Luton Road, Harpenden, AL5 5AF, What 3 Words ///point.blaze.spoon (Figure 1). The current site comprises an open field within the rear of Forge Cottages, accessed off Crabtree Lane and situated at NGR TL 14920 14908 (Figure 2).

2.1 Context

It is understood that the proposed development comprises the construction of ~22 residential dwellings (Figure 3).

The works have been completed in line with the current regulations, guidance and good practice presented in Appendix A.

2.2 Agreed Scope of Works and Objectives

The scope of work that was agreed with the client is presented in Table 1.

Table 1 – Agreed Scope of Works and Objectives

Item	Scope of Works	Objectives
1	Site walkover	To identify any areas of potential contamination
2	Permeability testing	Investigate the drainage potential of the materials through BRE365 permeability testing.
3	Reporting	<ul style="list-style-type: none">Complete a Phase 1 desk-based study of the site to ascertain information on the site geology, hydrology, and surrounding land uses.Provide recommendations on drainage potential.

3.0 PHASE 1 DESK STUDY

3.1 Information Sources

The sources of information that were used during the desk study included the following items:

- Site walkover (photos presented in Appendix [B](#))
- Environmental database information (Appendix [C](#))
- Publicly available information

3.2 Site Description and Walkover

The current site comprises an open field used by the landowners as a private garden and measures ~1.2ha measuring ~120m from north to south and ~100m from west to east and is accessed via a gated entrance off Crabtree Lane.

There were no bulk fuel storage tanks identified onsite, nor any signs of staining to the surface resulting from chemical or oil spillages.

3.2.1 Surrounding Area

The site lies within a semi-rural location comprises the following land uses:

- Northern Boundary: Harpenden Arts and Conference Centre and Katherine Warington School
- Southern Boundary: River Lea and residential dwellings
- Eastern Boundary: Open fields
- Western Boundary: Forge Cottages, with commercial land use further to west

3.3 Key Findings of Desk Study

The key findings from the database information pack are presented in Table 2 with the database presented in full in Appendix C.

Table 2 – Key Findings of Desk Study

Item	Details
Published geology	<ul style="list-style-type: none">• Bedrock geology – Lewes Nodular Chalk Formation• Superficial geology – Kesgrave Catchment and Alluvium
Geological hazards	<ul style="list-style-type: none">• Moderate natural ground subsidence and ground dissolution of soluble rocks• All other geological hazards are low
Ground Cavities	Solution pipe x 3 located 313m SW

Item	Details
Hydrogeology	<ul style="list-style-type: none"> Principal Bedrock Aquifer Secondary A Superficial Aquifer SPZ Zone 3 1no potable abstraction 977m SW
Hydrology/flood risk	<ul style="list-style-type: none"> River Lea runs along the southern boundary Southern half of site situated within Flood Zone 3 (High Risk) Recorded historical flood events on site from 1947, 1987 and 2007 High surface/groundwater water flood risk
Current land use on site	Open field used as an private garden open space area to Forge Cottages
Current land use within 250m	<ul style="list-style-type: none"> Sewage pumping station 6m W Harpenden Mill Autocare and Garage 100m W Old Batford Mill 150m W Harpenden Arts and Conference centre 50m N Katherine Warrington School 120m N Marquis Lane Allotments 60m SW River Lea Southern site border Residential Dwellings 100m S
Historical land use on site	Open field since 1879 until c1980 when Forge Cottages, with minor alterations until present day. The text <i>Surface of Water 18th February 1922</i> is present on 1922 map.
Historical land use with 250m	<ul style="list-style-type: none"> Residential development is present from c1966 (100m S). Further residential expansion appears within 100m of site from c1975 Northwest of site along Lower Luton Road. Batford Mill from c1877 Allotment gardens appear within 100m Southwest of site from c1992 until present Sewage outfall within 200m southeast of site appears c1922 remains until 1993 Sewage works c1877 ~250m south of site, disappears by c1884
Landfills/infilled land	<ul style="list-style-type: none"> No historical landfills within 250m of site Sand pit c1922 and c1948 onsite Refuse heap c1922 and c1946 onsite Gravel pit within 20m of site
Identified potential areas of concern	A: Potentially made ground
Pollution incidents	None recorded within 250m
Radon risk	<ul style="list-style-type: none"> Less than 1% (Low risk – no protection measures) Moderate risk (Between 3% and 5%) identified in Northwest corner
UXO risk	Moderate risk area
Environmental Sensitive Land Uses	<ul style="list-style-type: none"> London Green Belt On site Nitrate vulnerable Zone On site – LEE Surface water, Hatfield Groundwater Priority Habitat Inventory On site – Coastal and floodplain grazing marsh Batford Springs 153NW of site

3.4 Preliminary Risk Assessment

3.4.1 Identification of Critical Receptors

The identified potentially critical receptors are presented in Table 3.

Table 3 – Identification of Potential Receptors

Receptor Type	Current/Future	Receptor Details	Active
Human Health	Future	Residential receptors onsite	Yes
	Future	Construction workers onsite	Yes
	Current	Residential/commercial receptors offsite	Yes
Controlled waters	Current	Groundwater within aquifer	Yes
	Current	Groundwater within SPZ/licensed abstraction	Yes
	Current	Surface water body	Yes

The risks to onsite workers can be minimised by following appropriate health and safety guidance on site (i.e. wearing protective clothing and washing).

3.4.2 Identification of Potential Areas of Concern

The list of potential areas of concern on site and in the surrounding area are summarised in Table 4.

Table 4 – Identification of Potential Areas of Concern

Ref Area of Concern	Location	Potential Risk	Comments
A	Onsite	Potentially imported made ground	Hydrocarbons (TPH, BTEX, PAH), heavy metals, inorganics, asbestos, cyanide, phenols, ground gas
B	Onsite	Infilled land	

The potential contaminants of PCBs arising from the electricity substation located offsite have been discounted as PCBs are not considered to be sufficiently mobile or soluble¹.

3.4.3 Identified Potential Pathways

Human Health Pathways

The potential human health exposure pathways for a residential receptor are indicated in Table 5.

¹ Department of the Environment, 1996, Industry Profile: Engineering works. P.14 Sect 3.2.1

Table 5 – Identification of Potentially Active Human Health Exposure Pathways

Potential Pathway	Active/ Inactive	Notes
Ingestion of soil and dusts	Active	Qualitative Risk Assessment required.
Dermal contact with soils and dust	Active	Qualitative Risk Assessment required.
Ingestion of home grown produce	Active	Qualitative Risk Assessment required
Inhalation of dusts	Active	Qualitative Risk Assessment required
Inhalation of organic vapours (generated by shallow soils) in external areas or inside buildings	Active	Qualitative Risk Assessment required.
Inhalation of organic vapours generated by dissolved phase groundwater migrating offsite to neighbouring residential properties	Active	Qualitative Risk Assessment required.
Inhalation of organic vapours generated by dissolved phase groundwater migrating onto site from surrounding offsite sources	Active	Qualitative Risk Assessment required.
Contaminants from site entering groundwater and migrating into public water abstraction borehole for human consumption	Inactive	No potable abstractions within 500m. No further assessment necessary.

Controlled Waters Pathways

The potentially active controlled waters migration pathways are indicated in Table 6.

Table 6 – Identification of Potentially Active Controlled Water Pathways

Potential Pathway	Active/ Inactive	Notes
Impacted soils leaching to groundwater within Principal Aquifer	Active	Qualitative Risk Assessment required
Impacted soils leaching to groundwater and migration to surface water	Active	Nearest surface water borders south of site. Qualitative Risk Assessment required.

Ground Gas Pathways

The potential for ground gas risk depends on source-pathway-receptor linkages, with the age of infilling and type of waste as controlling factors. The potentially active migration pathways for ground gas are indicated in Table 7, along with a qualitative risk assessment.

Table 7 – Identification of Potentially Active Ground Gas Pathways

Potential Pathway	Active/ Inactive	Qualitative Risk Assessment	Notes
Potential for natural materials with high organic content, such as peat (>4% TOC)	Inactive	Low	No indicated by geology. No further assessment required.
Availability of readily degradable material, such as vegetable matter and food waste	Inactive	Low	No further assessment required.
Nature of fill material - depth of fill >1m, incohesive materials, poorly compacted and within unsaturated zone.	Active	Low/Moderate	Further assessment required.
Age of Materials - Ground gas generated from current/historical landfills <25yrs old	Inactive	Low	No landfills or mine workings recorded within 250m of site. No further assessment required.
Distance from receptor – a higher distance reduces the potential risk for offsite migration. High risk generally limited to within 100m distance.	Active	Low/Moderate	Commercial and residential receptors within 150m of site.
Presence of Preferential Pathways – fissures/fractures in bedrock or permeable strata beneath an impermeable cover	Active	Low/Moderate	Published bedrock geology is Lewes nodular chalk and Seaford chalk formation beneath Kesgrave catchment and Alluvium.
Chemical storage/spillages with potential for hydrocarbon vapours	Inactive	Low	No further assessment required.
Shallow or deep mine workings	Inactive	Low	No further assessment required.
Radon gas protective measures required	Active	Low/Moderate	<1% (Low risk). Moderate risk (Between 3% and 5%) identified in Northwest Corner. Basic protective measures required.

3.4.4 Qualitative Risk Assessment

A summary of the relevant pollutant linkages based on a source-pathway-receptors analysis is provided in Table 8.

Table 8 – Summary of Potentially Active Source-Pathway-Target Assessment

Sources	Potential Pathway	Potential Receptor	Risk Classification
Onsite Sources (Potentially imported made ground)	Dermal contact, outdoor and indoor inhalation, ingestion, homegrown produce	Human Health (Onsite Residential)	Low/Moderate
	Vapour inhalation from dissolved phase groundwater migrating from site to neighbouring properties	Human Health (Offsite Residential)	Low/Moderate
	Impacted soil leaching to groundwater within Principal Aquifer	Controlled Waters (Groundwater)	Low/Moderate
	Impacted soil leaching to groundwater and migration to surface water	Controlled Waters (Surface water)	Low/Moderate
Offsite Source (Industrial land uses)	Vapour inhalation from dissolved phase migration from offsite sources	Human Health (Onsite residential)	Low
Onsite Sources (Made ground)	Source for ground gas generation	Human Health (Onsite residential)	Low/Moderate
Radon sources	Source for radon gas from natural geology	Human Health (Onsite residential)	Low/moderate

4.0 PHASE II INVESTIGATION WORKS

4.1 Summary Of Works

The intrusive locations are detailed on Figure 4 and comprise the following:

- 4no. Trial Pits (TP1-TP4) were excavated to a maximum depth of 1.10m bgl for soakage testing.

All of the fieldwork was completed under the supervision of a WDE site engineer. Each location was scanned for underground services using a CAT/Genny prior to drilling. Soils were logged to British Standards by the supervising engineer.

4.2 Constraints/Selection of Intrusive Locations

Locations for intrusive investigation were provided by the client. Groundwater seepage encountered in:

- TP1.1 at 1.10m
- TP1.2 at 1.10m bgl
- TP2 1.10m bgl

Trial pits were terminated as soon as groundwater was encountered.

4.3 Field Results

4.3.1 Geology

The typical material/geology that was encountered during the intrusive works is summarised below in Table 9 and presented on the borehole logs in Appendix B.

Table 9 – Summary of Geology Proved Onsite

Units	Description	Min – Max Depth Base (m bgl)	Average Depth (m bgl)	Locations
Topsoil		0.20	0.00 – 0.20	All
Gravelly clay	Firm grey/brown gravelly clay	0.50+ – 1.10+	0.20 – 0.86+	All

4.3.2 Groundwater

Groundwater was encountered at 1.1m in TP1.1, TP1.2 and TP2.

4.3.3 Permeability Results

A summary of BRE365 soakage results is presented in Table 10 and in full in Appendix B.

Table 10 – Summary of BRE365 Soakage Testing

Location	Depth (m bgl)	Test Type	Strata	Drainage (m/sec)	Drainage (m/sec)	Drainage (m/sec)	Qualitative Soakage Potential
				Test 1	Test 2	Test 3	
TP1.2	1.00	BRE365	Gravelly clay	1.18E-05	1.07E-05	8.33E-06	Moderate/Poor
TP2	1.00	BRE365	Gravelly clay	1.13E-05	6.93E-06	5.59E-06	Moderate/Poor
TP3	0.50	BRE365	Gravelly clay	9.09E-06	7.31E-06	7.10E-06	Poor
TP4	0.50	BRE365	Gravelly clay	8.01E-06	6.51E-06	3.64E-06	Poor

The soakage testing indicates moderate to poor soakage rates. Groundwater was encountered at 1.10m bgl and therefore the site is not likely to be viable for shallow soakage's to ground.

A drainage engineer should be consulted further.

4.3.4 Revised Ground Gas Risk Assessment

An update to the ground gas risk assessment is presented in Table 11 which has incorporated the results obtained from this assessment.

Table 11 – Updated Ground Gas Risk Assessment

Identified Active Sources	Identified Active Potential Pathways	Potential Receptors	Quantitative Risk Assessment
No made ground encountered on site	No source	No source	Low

The revised ground gas risk assessment indicates a very low risk from ground gas (*Very Low/NHBC Green*).

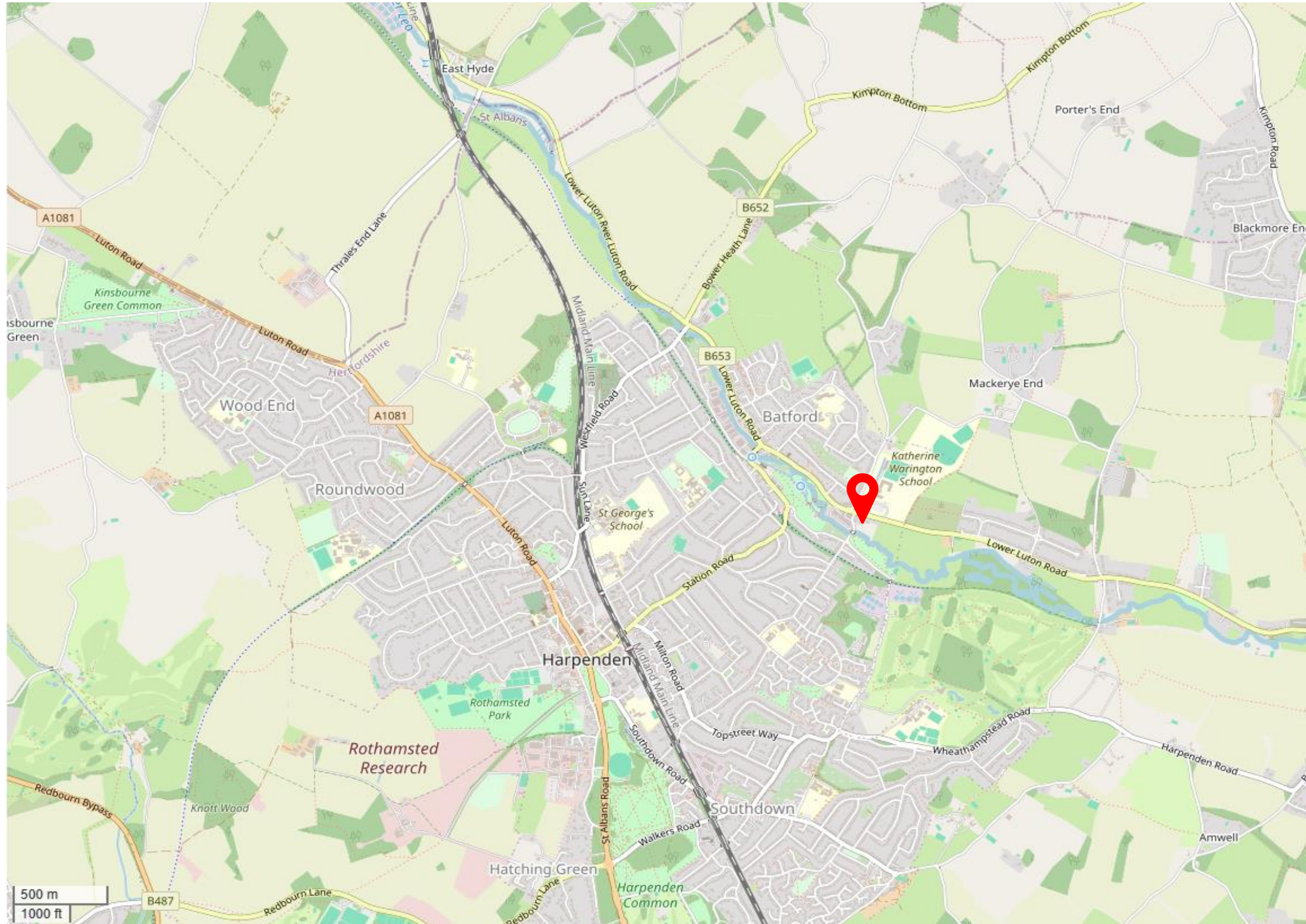
5.0 RECOMMENDATIONS FOR FURTHER WORK

The site has been assessed to have a low/moderate risk to future receptors from contamination.

WDE recommends that the following items are undertaken:

- Preliminary UXO report due to the moderate UXO risk identified
- BGS Radon report due to the low/moderate risk identified
- Additional investigations are undertaken to confirm the foundation design.
- Site won materials are reused in line with CL:AIRE Code of Practice.

FIGURES



62A Western Road
Tring
HERTS
HP23 4BB
T: 01442 825570

Client

JARVIS HOMES

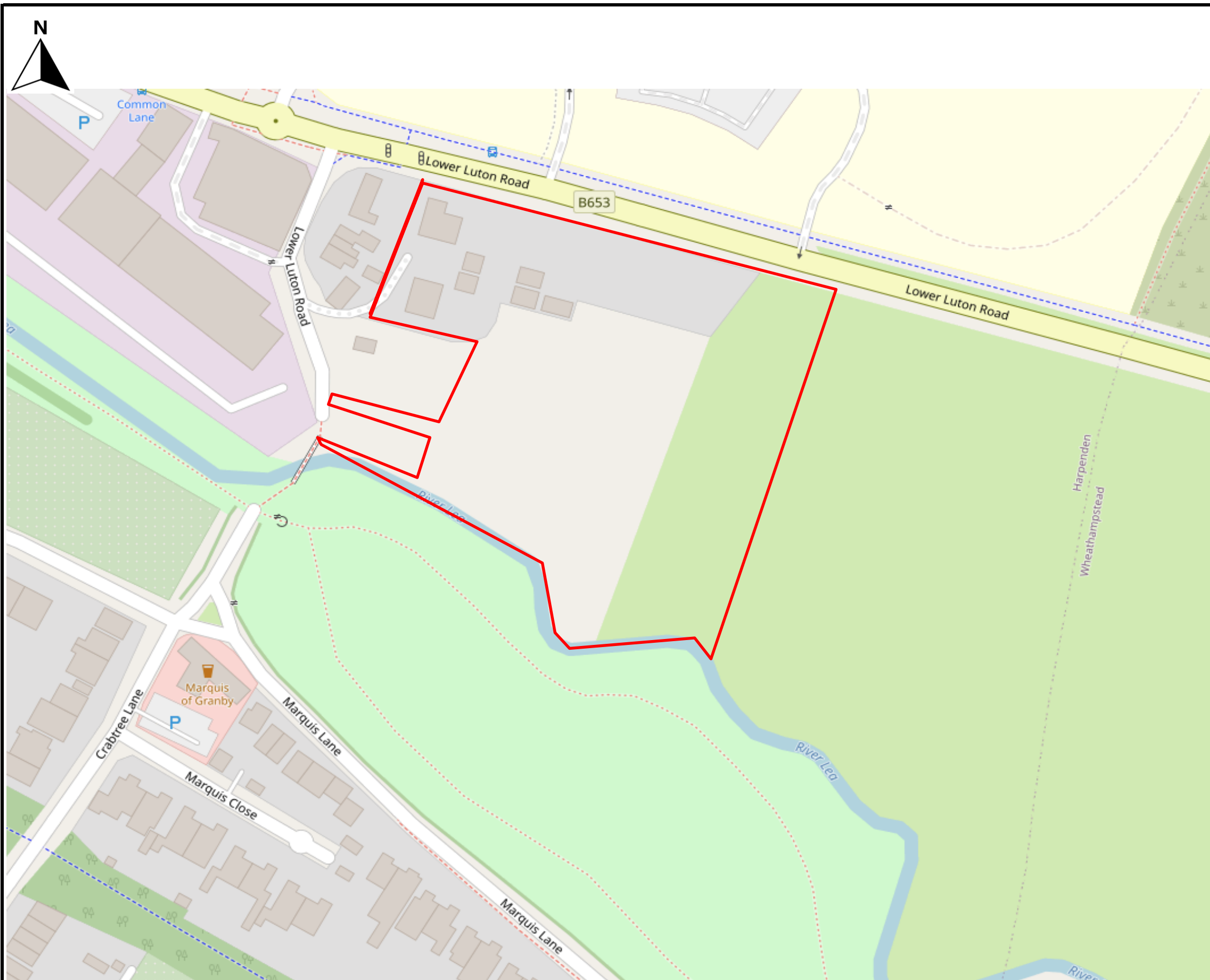
Project

LOWER LUTON ROAD, HARPENDEN

Title

FIGURE 1: SITE LOCATION PLAN

© OpenStreetMap contributors



LEGEND

Client

JARVIS HOMES

Project

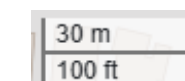
LOWER LUTON ROAD, HARPENDEN

Title

FIGURE 2: CURRENT SITE PLAN

© OpenStreetMap contributors

Approximate Scale





LEGEND

Client

JARVIS HOMES

Project

LOWER LUTON ROAD, HARPENDEN

Title

FIGURE 3:PROPOSED SITE PLAN

Drawing supplied by client

APPENDIX A: RELEVANT GUIDANCE AND LEGISLATION

WDE Consulting has duly taken account of the recommendation contained within relevant guidance documents and legislation during the preparation of this report.

CONTAMINATION

Part IIa of the Environmental Protection Act 1990 defined contamination in relation to continued land use and introduced the “polluter pays” principal. The Groundwater Regulations 1998 defined List 1 and List 2 substances and the procedures for preventing them from entering groundwater. The Water Resources Act of 1991 introduced the term “controlled waters” and gave powers to the Environment Agency to require remediation where there was pollution of controlled waters.

The National Planning Policy Framework² requires the following:

- The site is made suitable for its intended use, taking account of all ground conditions arising from natural and former activities, pollution arising from previous uses and proposals for mitigation including land remediation.
- After remediation, as a minimum, land should not be capable of being determined as contaminated land under Part IIA of the Environmental Protection Act 1990.
- Adequate site information, prepared by a competent person, is presented.

The methodology adopted for this report follows the guidance and procedures for Land Contamination Risk Management (LCRM) produced by the Agency³. The LCRM process provides a reasoned and structured mechanism to identify potential risk issues and, where necessary, provide a way forward to develop a robust risk management strategy to address potentially unacceptable risks in an appropriate manner. Contained within the LCRM Framework are the following stages:

1. Stage 1 risk assessment
2. Stage 2 options appraisal
3. Stage 3 remediation and verification

British Standards has issued guidance for the Investigation of Potentially Contaminated Sites⁴ and for undertaking Site Investigations⁵ which have duly been considered. An update to the potential human health exposure pathways is provided in the Environment Agency Soil Science Report SR3⁶. In 2008 the Environment Agency and the National House-Building Council (NHBC), Chartered Institute of Environmental Health (CIEH) released a joint publication for the Safe Development of Housing on Land

² Department of Communities and Local Government. March 2012

³ Environment Agency. 2020. Land Contamination Risk Management (LCRM)

⁴ British Standards 2011. Investigation of Potentially Contaminated Sites-Codes of Practice. BS10175:2011

⁵ British Standards. 2015. Code of Practice for Site Investigations. BS5930

⁶ Environment Agency, August 2008, Updated technical background to the CLEA model, Science Report - SC050021/SR3

Affected by Contamination⁷. Guidance is provided in the CLR Report No 4 on sampling strategies for contaminated land⁸.

QUALITATIVE RISK ASSESSMENT

The potentially active human health are based on the Agency Soil Science Report SR3⁹. The potential contaminants of PCBs arising from the electricity substation located offsite have been discounted as PCBs are not considered to be sufficiently mobile or soluble¹⁰.

To assess the potential for risk, the Source ® Pathway ® Receptor relationships have been evaluated to determine whether there are potentially active pollutant linkages between sources and receptors. Only when there is an active pollutant linkage, can there be a potential risk to a receptor from a source via a particular pathway. Each active pathway has been assigned a qualitative assessment as to the level of risk as shown in the below table and as per R&D 66⁷.

Qualitative Risk Classification Scheme

		CONSEQUENCE			
		Severe	Medium	Mild	Minor
PROBABILITY (Likelihood)	High likelihood	Very High Risk	High risk	Moderate risk	Low risk
	Likely	High risk	Moderate risk	Moderate/low risk	Low risk
	Low likelihood	Moderate risk	Moderate/low risk	Low risk	Very low risk
	Unlikely	Moderate/low risk	Low risk	Very low risk	Very low risk

GROUND GAS

The following relevant guidance will be used to assess the risks posed by ground gas:

- CIRIA Assessing risks posed by hazardous ground gases to buildings¹¹
- NHBC: Guidance on evaluation of development proposals on sites where methane and carbon dioxide are present¹²
- NHBC: Technical Extra¹³

⁷ Environment Agency. 2008. Guidance for the Safe Development of Housing on Land Affected by Contamination. R&D 66

⁸ DOE. 1994. Sampling Strategies for Contaminated Land. CLR Report No 4

⁹ Environment Agency, August 2008, Updated technical background to the CLEA model, Science Report - SC050021/SR3

¹⁰ Department of the Environment, 1996, Industry Profile: Engineering works. P.14 Sect 3.2.1

¹¹ CIRIA 2007. Assessing Risks Posed by Hazardous Ground Gases to Buildings. C665

¹² NHBC 2007. Guidance on Evaluation of Development Proposals on Sites where methane and carbon dioxide are present

¹³ NHBC 2016. Technical Extra. Ground Gas Update. April 2016. Issue 20

- The Building Regulations Site Preparation and resistance to contaminants and moisture. ¹⁴
- British Standard. Guidance on Investigations for Ground Gas¹⁵
- NHBC guidance on Hazardous ground gas¹⁶

Summary of NHBC Traffic Light System

Gas Regime	Methane		Carbon Dioxide	
	Typical max %	Gas Screening Value (l/hr)	Typical max %	Gas Screening Value (l/hr)
Green	<1	<0.16	<5	<0.78
Amber 1	1 – 5	0.16 – 0.63	5 – 10	0.78 – 1.56
Amber 2	5 – 20	0.63 – 1.56	10 – 30	1.56 – 3.13
Red	20+	1.56+	30+	3.13+

SOAKAGE TESTING AND DESIGN

The following guidance has been followed during the soakage testing:

- Falling Head Tests in boreholes – BS5930⁵
- BRE Digest 365 2003 Soakage testing

The CIRIA publication¹⁷ provides guidance as to the required distance of buildings from soakage's to ground in chalk as follows:

- 20m distance of soakaways from buildings where dissolution features are known to be prevalent
- 10m distance of soakaways from buildings where chalk is low density or unknown
- 5m distance of soakaways from buildings where chalk is of medium to high density

¹⁴ Building Regulations 2004. Approved Document C, Site Preparation and resistance to contaminants and moisture.

¹⁵ British Standards 2013. Guidance on Investigation for Ground Gas. BS8576. 2013

¹⁶ NHBC 2023. Hazardous Ground Gas – an essential guide for housebuilders. NF94

¹⁷ CIRIA. 2002. Engineering in Chalk. C574.

APPENDIX B: SITE PHOTOS

Photo 1 – Site Overview



Photo 2 – TP2 East of Site



Photo 3 – TP3 North of site



Photo 4 – TP2 Backfilled on completion



APPENDIX C: ENVIRONMENTAL DATABASE

Folder link: [Appendix C - Environmental Database](#)

APPENDIX D: FIELD LOGS



APPENDIX E: FIELD SHEETS

TP1.1

Hole Type	Easting	Northing	Ground Level (m)	Scale
TP				1:25

Project Name	Project No.	Start Date	End Date
Lower Luton Road, Harpenden	21372	2025-04-09	2025-04-09

Client Jarvis Homes	Consultant Charlotte Bird	Contractor
-------------------------------	-------------------------------------	-------------------

Inst/ Backfill	Water Levels	Samples and Tests			Level (m)	Depth (thickness) (m)	Strata		
		Depth (m)	Type/ Ref	Results			Legend	Description	
						(0.20)		TOPSOIL	
						0.20		Firm grey/brown slightly gravelly cobbly CLAY . Gravels are fine to coarse rounded to angular.	
						(0.90)			
						1.10	End of Trial Pit at 1.10m		

Remarks	Method, Plant, Stability, Dimensions	Logge
Groundwater encountered at 1.10m		



	<h1>Trial Pit</h1>				<h2>TP1.1</h2>
					SUPPLEMENTARY INFO
	Hole Type TP	Easting	Northing	Ground Level (m)	Scale 1:25
Project Name Lower Luton Road, Harpenden		Project No. 21372	Start Date 2025-04-09	End Date 2025-04-09	
Client Jarvis Homes		Consultant Charlotte Bird		Contractor	
Water Strike - General					
Struck (m)	Seal Depth (m)	Casing Depth (m)	Date and Time	Remarks	
1.10					
Remarks Groundwater encountered at 1.10m				Method, Plant, Stability, Dimensions Logger	

TP1.2

Hole Type	Easting	Northing	Ground Level (m)	Scale
TP				1:25

Project Name	Project No.	Start Date	End Date
Lower Luton Road, Harpenden	21372	2025-04-09	2025-04-09

Client Jarvis Homes	Consultant Charlotte Bird	Contractor
-------------------------------	-------------------------------------	-------------------

Inst/ Backfill	Water Levels	Samples and Tests			Level (m)	Depth (thickness) (m)	Strata		
		Depth (m)	Type/ Ref	Results			Legend	Description	
						(0.20)		TOPSOIL	<div><div></div><div>0.5</div><div>1.0</div><div>1.5</div><div>2.0</div><div>2.5</div><div>3.0</div><div>3.5</div><div>4.0</div><div>4.5</div><div>5.0</div></div>
						0.20		Firm grey/brown slightly gravelly cobbly CLAY. Gravels are fine to coarse rounded to angular.	
						1.10		End of Trial Pit at 1.10m	

Remarks	Method, Plant, Stability, Dimensions	Logger
Groundwater encountered at 1.10m		

		Trial Pit				TP1.2		
							SUPPLEMENTARY INFO	
		Hole Type TP		Easting	Northing	Ground Level (m)	Scale 1:25	
Project Name Lower Luton Road, Harpenden		Project No. 21372		Start Date 2025-04-09		End Date 2025-04-09		
Client Jarvis Homes		Consultant Charlotte Bird			Contractor			
Water Strike - General								
Struck (m)		Seal Depth (m)	Casing Depth (m)	Date and Time	Remarks			
1.10								
Remarks Groundwater encountered at 1.10m					Method, Plant, Stability, Dimensions		Logger	

TP2

Sheet 1 of 1

Hole Type

Easting

Northing

Ground Level (m)

Scale

Project Name

Project No.

Start Date

End Date

Lower Luton Road, Harpenden

21372


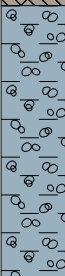
2025-04-09

2025-04-09

Client
Jarvis Homes

Consultant
Charlotte Bird

Contractor

Inst/ Backfill	Water Levels	Samples and Tests			Level (m)	Depth (thickness) (m)	Strata		
		Depth (m)	Type/ Ref	Results			Legend	Description	
						(0.20)		TOPSOIL	<div><div></div><div>— 0.5 —</div><div>— 1.0 —</div><div>— 1.5 —</div><div>— 2.0 —</div><div>— 2.5 —</div><div>— 3.0 —</div><div>— 3.5 —</div><div>— 4.0 —</div><div>— 4.5 —</div><div>— 5.0 —</div></div>
						0.20		Firm grey/brown slightly gravelly cobbly CLAY . Gravels are fine to coarse rounded to angular.	
						(0.90)			
						1.10			
<div>End of Trial Pit at 1.10m</div>									

Remarks

Groundwater encountered at 1.10m

Method, Plant, Stability, Dimensions

0.00 - 1.00m	TP
--------------	----

Stable

$L = 2.00\text{m}$

$$W = 0.70m$$

Logger

CNB

TP2

Hole Type TP	Easting	Northing	Ground Level (m)	Scale 1:25
Project Name Lower Luton Road, Harpenden		Project No. 21372	Start Date 2025-04-09	End Date 2025-04-09

Client Jarvis Homes	Consultant Charlotte Bird	Contractor
-------------------------------	-------------------------------------	-------------------

Struck (m)	Seal Depth (m)	Casing Depth (m)	Date and Time	Remarks
1.10				

1.10

Remarks
Groundwater encountered at 1.10m

Method, Plant, Stability, Dimensions	Logger
0.00 - 1.00m TP	CNB
Stable	

 $L = 2.00\text{m}$
$$W = 0.70m$$

TP3

Hole Type	Easting	Northing	Ground Level (m)	Scale
TP				1:25

Project Name	Project No.	Start Date	End Date
Lower Luton Road, Harpenden	21372	2025-04-09	2025-04-09

Client Jarvis Homes	Consultant Charlotte Bird	Contractor
-------------------------------	-------------------------------------	-------------------

0.5
1.0
1.5
2.0
2.5
3.0
3.5
4.0
4.5
5.0

Remarks	Method, Plant, Stability, Dimensions	Logger
Groundwater not encountered	0.00 - 0.50m TP	CNP

--	--

$$W = 0.70m$$

TP4

Sheet 1 of 1

Hole Type
TP

Easting

Northing

Ground Level (m)

Scale
1:25

Project Name

Project No.

Start Date

End Date

Lower Luton Road, Harpenden

21372

2025-04-09

2025-04-09

Client
Jarvis Homes

Consultant
Charlotte Bird

Contractor[illegible]

Remarks	Groundwater not encountered
---------	-----------------------------

Method, Plant, Stability, Dimensions

0.00 - 0.50m	TP
Stable	

 $L = 2.20\text{m}$

10

$$W = 0.70m$$

Logger	
--------	--

CNB

ap50	2.058
V ₇₅	3,900
V ₂₅	10250
tp75 - 25	6350



Vp	Amount of Water Lost	DTW bgl
75%	0.1575	-0.5525
25%	0.0525	-0.6575

1.18E-05

[illegible]

TP1 (Fill 3)

Time (seconds)

Depth (m) below ground level

V_{75}

V_{25}

Time (seconds)	Depth (m) below ground level
0	0.48
500	0.50
1000	0.52
5500	0.54
8000	0.58
10500	0.62
11000	0.63

Vp	Amount of Water Lost	DTW bgl
75%	0.1125	-0.5175
25%	0.0375	-0.5925

8.33E-06

[illegible][illegible]

[illegible]

TP2 (Fill 2)

Time (seconds)

Depth (m) below ground level

Time (seconds)	Depth (m) below ground level
0	-0.60
1000	-0.61
3500	-0.62
6000	-0.64
7500	-0.65
10000	-0.68

V_{75}
 V_{25}

Comments:

Vp	Amount of Water Lost	DTW bgl
75%	0.06	-0.62
25%	0.02	-0.66

Soil Infiltration Rate (m/sec)

6.93E-06

[illegible]

TP3 (Fill 2)

Time (seconds)

Depth (m) below ground level

V_{75}

V_{25}

Time (seconds)	Depth (m) below ground level
0	-0.20
2000	-0.25
4500	-0.28
7000	-0.35
9000	-0.37
11000	-0.39
14000	-0.40
17000	-0.43

Vp	Amount of Water Lost	DTW bgl
75%	0.225	-0.275
25%	0.075	-0.425

Soil Infiltration Rate (m/sec)	7.31E-06
--------------------------------	----------

[illegible]

TP4 (Fill 3)

Time (seconds)

Depth (m) below ground level

V_{75}

V_{25}

Time (seconds)	Depth (m) below ground level
0	-0.24
1000	-0.27
3000	-0.29
6000	-0.31
10000	-0.32
14000	-0.35

Vp	Amount of Water Lost	DTW bgl
75%	0.0825	-0.2675
25%	0.0275	-0.3225

3.64E-06

WDE RANGE OF SERVICES





Lucion Ground Engineering Limited
Newark Road
Peterborough
PE1 5UA
Registered in England No 6929574
01733 566566
geadmin@luciongroup.com

EXPLORATORY HOLE RECORDS

LOWER LUTON ROAD

HARPENDEN

Report Reference No. 136262

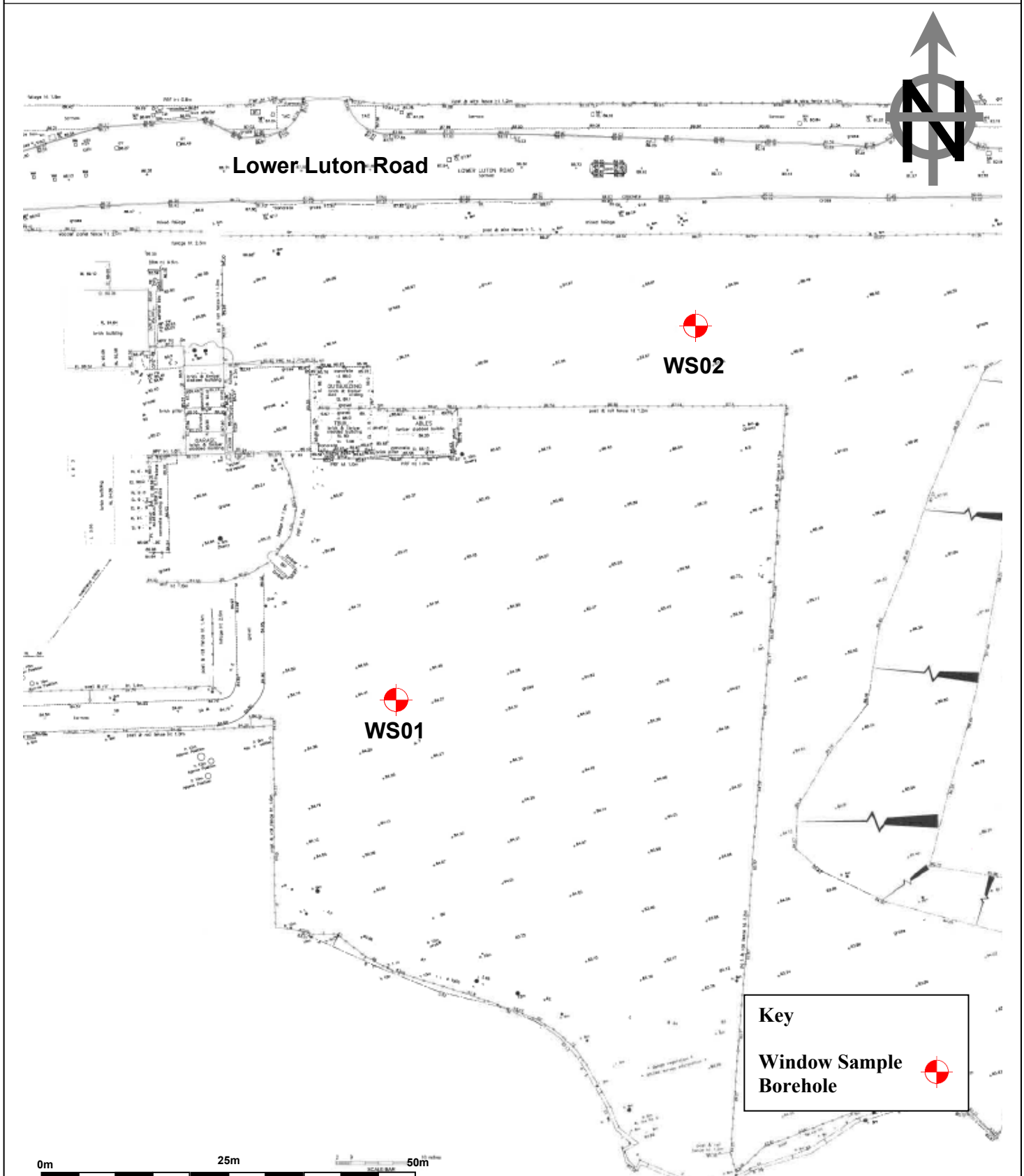
On behalf of: -

Jarvis Homes Limited
Burgundy House
21 The Foresters
Harpenden
AL5 2FB

July 2025

Exploratory Hole Location Plan

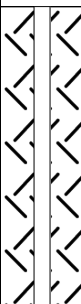
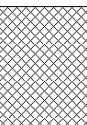
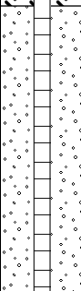
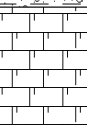
Reproduced from a plan provided by the client.



Project : Lower Luton Road, Harpenden

Client : Jarvis Homes Limited

<div><div><div><div><div></div><div>Lucion</div><div>improving people and planet</div></div></div><div>LUCION GROUND ENGINEERING LTD.</div><div>Peterborough Tel : 01733 566566</div></div></div>			Site: Lower Luton Road, Harpenden				WINDOW SAMPLE WS01		
			23/07/2025		Final Depth 4.00 m	Equipment Dynamic Sampling Rig			
Sample and In Situ Testing			Water Levels (Casing)	Well	Stratum Description	Legend	Depth (m)		
Depth (m)	Type	Results							
0.20	D1	N0 (1/0,0,0,0)	<div><div></div><div></div><div></div><div></div><div></div><div></div><div></div><div></div><div></div><div></div><div></div><div></div><div></div><div></div><div></div><div></div><div></div><div></div><div></div><div></div><div></div><div></div><div></div><div></div><div></div><div></div><div></div><div></div><div></div><div></div><div></div><div></div><div></div><div></div><div></div><div></div><div></div><div></div><div></div><div></div><div></div><div></div><div></div><div></div><div></div><div></div><div></div><div></div><div></div><div></div><div></div><div></div><div></div><div></div><div></div><div></div><div></div><div></div><div></div><div></div><div></div><div></div><div></div><div></div><div></div><div></div><div></div><div></div><div></div><div></div><div></div><div></div><div></div><div></div><div></div><div></div><div></div><div></div><div></div><div></div><div></div><div></div><div></div><div></div><div></div><div></div><div></div><div></div><div></div><div></div><div></div><div></div><div></div><div></div><div></div><div></div><div></div><div></div><div></div><div></div><div></div><div></div><div></div><div></div><div></div><div></div><div></div><div></div><div></div><div></div><div></div><div></div><div></div><div></div><div></div><div></div><div></div><div></div><div></div><div></div><div></div><div></div><div></div><div></div><div></div><div></div><div></div><div></div><div></div><div></div><div></div><div></div><div></div><div></div><div></div><div></div><div></div><div></div><div></div><div></div><div></div><div></div><div></div><div></div><div></div><div></div><div></div><div></div><div></div><div></div><div></div><div></div><div></div><div></div><div></div><div></div><div></div><div></div><div></div><div></div><div></div><div></div><div></div><div></div><div></div><div></div><div></div><div></div><div></div><div></div><div></div><div></div><div></div><div></div><div></div><div></div><div></div><div></div><div></div><div></div><div></div><div></div><div></div><div></div><div></div><div></div><div></div><div></div><div></div><div></div><div></div><div></div><div></div><div></div><div></div><div></div><div></div><div></div><div></div><div></div><div></div><div></div><div></div><div></div><div></div><div></div><div></div><div></div><div></div><div></div><div></div><div></div><div></div><div></div><div></div><div></div><div></div><div></div><div></div><div></div><div></div><div></div><div></div><div></div><div></div><div></div><div></div><div></div><div></div><div></div><div></div><div></div><div></div><div></div><div></div><div></div><div></div><div></div><div></div><div></div><div></div><div></div><div></div><div></div><div></div><div></div><div></div><div></div><div></div><div></div><div></div><div></div><div></div><div></div><div></div><div></div><div></div><div></div><div></div><div></div><div></div><div></div><div></div><div></div><div></div><div></div><div></div><div></div><div></div><div></div><div></div><div></div><div></div><div></div><div></div><div></div><div></div><div></div><div></div><div></div><div></div><div></div><div></div><div></div><div></div><div></div><div></div><div></div><div></div><div></div><div></div><div></div><div></div><div></div><div></div><div></div><div></div><div></div><div></div><div></div><div></div><div></div><div></div><div></div><div></div><div></div><div></div><div></div><div></div><div></div><div></div><div></div><div></div><div></div><div></div><div></div><div></div><div></div><div></div><div></div><div></div><div></div><div></div><div></div><div></div><div></div><div></div><div></div><div></div><div></div><div></div><div></div><div></div><div></div><div></div><div></div><div></div><div></div><div></div><div></div><div></div><div></div><div></div><div></div><div></div><div></div><div></div><div></div><div></div><div></div><div></div><div></div><div></div><div></div><div></div><div></div><div></div><div></div><div></div><div></div><div></div><div></div><div></div><div></div><div></div><div></div><div></div><div></div><div></div><div></div><div></div><div></div><div></div><div></div><div></div><div></div><div></div><div></div><div></div><div></div><div></div><div></div><div></div><div></div><div></div><div></div><div></div><div></div><div></div><div></div><div></div><div></div><div></div><div></div><div></div><div></div><div></div><div></div><div></div><div></div><div></div><div></div><div></div><div></div><div></div><div></div><div></div><div></div><div></div><div></div><div></div><div></div><div></div><div></div><div></div><div></div><div></div><div></div><div></div><div></div><div></div><div></div><div></div><div></div><div></div><div></div><div></div><div></div><div></div><div></div><div></div><div></div><div></div><div></div><div></div><div></div><div></div><div></div><div></div><div></div><div></div><div></div><div></div><div></div><div></div><div></div><div></div><div></div><div></div><div></div><div></div><div></div><div></div>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<div><div><div><div></div><div>Lucion</div><div>improving people and planet</div></div><div>LUCION GROUND ENGINEERING LTD.</div><div>Peterborough Tel : 01733 566566</div></div></div>			Site: Lower Luton Road, Harpenden				WINDOW SAMPLE WS02					
23/07/2025			Final Depth 4.45 m		Equipment Dynamic Sampling Rig							
Sample and In Situ Testing			Water Levels (Casing)	Well	Stratum Description	Legend	Depth (m)					
Depth (m)	Type	Results										
0.10	D4	N5 (3/0,1,2,2)			MADE GROUND - Light brown, silty, gravelly SAND. Gravel of flint and brick.		0.40					
0.30	D1				Very stiff, becoming firm, brown and orange brown, slightly gravelly, silty CLAY. Gravel of angular to sub-rounded flint.							
0.60	D2											
0.90	D3											
1.20 1.20-2.00 1.35-1.65	D5 U1 SPT	N72 (23/30,24,13,5)	(2.00)		Structureless CHALK of firm, off-white and white, gravelly SILT with occasional firm, brown clay partings. Gravel of angular to sub-angular, very weak to weak, low density chalk clasts, and occasional coarse gravel size flint nodules.		1.45					
2.00 2.00-3.00 2.15-2.45	D6 U2 SPT											
3.00 3.00-4.00 3.15-3.45	D7 U3 SPT											
4.00 4.15-4.45	D8 SPT											
...with iron staining on chalk clasts below 3.70m depth.					End of Borehole at 4.45m							



Appendix B

