

Ruth Ambrose
St Albans District Council
Development Control
Civic Centre St. Peters Street
St. Albans
Hertfordshire
AL1 3LA

Our ref: NE/2020/132344/01-L01
Your ref: 5/2020/1992
Date: 12 October 2020

Dear Ruth,

Roundhouse Farm, Bullens Green Lane, Colney Heath, St Albans, AL4 0FU.

Outline application (access sought) - construction of up to 100 dwellings together with all ancillary works.

Thank you for consulting us on the above application on 25 September 2020.

We have reviewed the following submitted documents:

- Preliminary Contamination Risk Assessment (P20-164pra), prepared by Paddock Geo Engineering Ltd and dated July 2020.
- Flood Risk Assessment and Drainage Strategy (18770/FRA and DS), prepared by Woods Hardwick and dated August 2020.

Groundwater is particularly sensitive in this location because the proposed development site is within Source Protection Zone 1 (SPZ1) and very close to the groundwater abstraction for the public water supply.

Based on the submitted reports, we are satisfied that there is a low risk of pollution to the water environment from land contamination associated with the previous site use. However, we consider there to be a potential risk to groundwater posed by the proposed infiltration drainage and piling/foundations, should these be modified from the exact submitted information during the course of detailed design and submission of reserved matters.

We consider that planning permission could be granted to the proposed development as submitted if the following planning conditions are included as set out below. Without these conditions, we would object to the proposal in line with paragraph 170, 178 and 179 of the National Planning Policy Framework (NPPF), Groundwater Position Statements within [‘The Environment Agency’s approach to groundwater protection’](#) as well as Policy 106 (Nature Conservation) and Policy 84A (Drainage Infrastructure) of the St Alban’s Local Plan (1994).

We ask to be consulted on the details submitted for approval to discharge these conditions and on any subsequent amendments/alterations.

Cont/d..

Condition 1 - Piling/Foundation Works

Piling or any other foundation designs using penetrative methods shall not be carried out other than with the written consent of the local planning authority. The development shall be carried out in accordance with the approved details.

Reason

To protect and prevent the pollution of controlled waters from mobilised contaminants in line with NPPF paragraphs 170, 178, 179, EA Groundwater Protection Position Statement N8 (Physical disturbance of aquifers in SPZ1) and Policy 106 (Nature Conservation) of the St Alban's Local Plan (1994).

Advice

Piling or any other foundation designs using penetrative methods can result in risks to potable supplies from things such as pollution/turbidity, drilling through different aquifers and creating preferential pathways. Please note that this planning application is 'Outline' and this condition may restrict the depth of foundations, which may therefore limit the height of any residences. Please refer to 'Piling in layered ground: risks to groundwater and archaeology' (<https://www.gov.uk/government/publications/piling-in-layered-ground-risks-to-groundwater-and-archaeology>), for more information.

We strongly recommend you also consult Affinity Water on piling/foundation proposals, who operate the nearby public water supply abstraction.

Condition 2 - Surface Water Discharge

No drainage systems for the infiltration of surface water to the ground are permitted other than with the written consent of the local planning authority. Any proposals for such systems must be supported by an assessment of the risks to controlled waters. The development shall be carried out in accordance with the approved details.

Reason

To protect and prevent the pollution of controlled waters from mobilised contaminants in line with NPPF paragraphs 170, 178, 179, EA Groundwater Protection Position Statements G12 (Discharge of clean roof water to ground) and G13 (Sustainable drainage systems) and Policy 84A (Drainage Infrastructure) of the St Alban's Local Plan (1994).

Advice

Controlled waters are particularly sensitive in this location because the proposed development site is within SPZ1. As a result, we do not believe that the use of infiltration Sustainable Drainage Systems are appropriate in this location.

Advice to Applicant

Water Resources

Increased water efficiency for all new developments potentially enables more growth with the same water resources. Developers can highlight positive corporate social responsibility messages and the use of technology to help sell their homes. For the homeowner lower water usage also reduces water and energy bills.

We endorse the use of water efficiency measures especially in new developments. Use of technology that ensures efficient use of natural resources could support the environmental benefits of future proposals and could help attract investment to the area. Therefore, water efficient technology, fixtures and fittings should be considered as part of new developments.

Residential Developments

All new residential development are required to achieve a water consumption limit of a maximum of 125 litres per person per day as set out within [the Building Regulations &c. \(Amendment\) Regulations 2015](#).

However, we recommend that in areas of serious water stress (as identified in our report 'Water stressed areas - final classification' available at <https://www.gov.uk/government/publications/water-stressed-areas-2013-classification>) a higher standard of a maximum of 110 litres per person per day is applied. This standard or higher may already be a requirement of the local planning authority.

Pre Application Advice

Regarding future applications, if you would like us to review a revised technical report prior to a formal submission, outside of a statutory consultation, and/or meet to discuss our position, this will be chargeable in line with our planning advice service. If you wish to request a document review or meeting, please contact our team email address at HNL SustainablePlaces@environment-agency.gov.uk.

Further information on our charged planning advice service is available at; <https://www.gov.uk/government/publications/planning-advice-environment-agency-standard-terms-and-conditions>.

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.

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

Yours sincerely,

Hannah Malyon
Sustainable Places Planning Advisor

Direct dial - 02084 749666

E-mail - HNL SustainablePlaces@environment-agency.gov.uk