

David Elmore
Welwyn-Hatfield District Council
Development Control
The Campus
Welwyn Garden City
Hertfordshire
AL8 6AE

Our ref: NE/2020/132363/01-L01
Your ref: 6/2020/2248/OUTLINE
Date: 22 October 2020

Dear David,

Roundhouse Farm, Land Off Of Bullens Green Lane, Colney Heath, AL4 0FU.

Outline permission for the erection of up to 100 dwellings, with all matters reserved except access.

Thank you for consulting us on the above application on 28 September 2020. The proposed development will only be acceptable subject to the inclusion of the below planning **conditions** on any permission granted. Without these conditions, we would object in line with Paragraph 170 of the National Planning Policy Framework (NPPF).

We note that this application is identical to the application 5/2020/1992 submitted to St Albans City and District Council, and subsequently replied to by ourselves, our reference: NE/2020/132344/01-L01, dated 12 October 2020.

As part of this consultation 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 in proximity to a groundwater abstraction point for public water supply.

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

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

Cont/d..

line with paragraphs 170, 178 and 179 of the NPPF. This position is also supported by Policies R2 (Contaminated Land) and R7 (Protection of Ground and Surface Water) of the Welwyn Hatfield District Plan (2005). Some piling techniques can cause preferential pathways for contaminants to migrate to groundwater and cause pollution. A piling risk assessment and appropriate mitigation measures should be submitted with consideration of the EA guidance.

Please see the “Advice to Applicant” section of this letter for further information on piling and foundation design.

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 paragraphs 170, 178 and 179 of the NPPF. This position is also supported by Policy R7 (Protection of Ground and Surface Water) of the Welwyn Hatfield District Plan (2005).

Infiltration of surface water has the potential to mobilise contamination present within the soil. Where the proposal involves the discharge of anything other than clean roof water via sealed drainage, within sensitive groundwater locations (such as and SPZ1), a risk assessment and suitable level of treatment will be required. In certain circumstances the discharge may be classified as a groundwater activity and require an environmental permit. These points are in line with the Environment Agency’s Groundwater Protection Position *Statements G13-Sustainable Drainage systems and G11- Discharges from areas subject to contamination*.

Please note, 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

Piling and Foundation Design

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, who operate the nearby public water supply abstraction point, on any piling/foundation proposals.

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,

George Goodby
Sustainable Places Planning Advisor

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