

### **Revlvel Association response to Growing Baldock Planning application.**

The Revlvel Association represents the views of our 150 members who are committed to the restoration of flow in the river Ivel chalk stream and the re-establishment of a healthy and self-sustaining population of brown trout, a key indicator species of chalk streams.

Where is the extra water for 3200 new homes, plus other concurrent developments in the area going to come from without causing further damage to the chalk streams in the Affinity Water/Anglian Water supply area? Water is already being pumped from the chalk aquifer at such a rate that the head spring river Ivel is now dry about 50% of the time and in 2019 and 2022 the first 3 km of the river dried up completely for many months. Affinity Water are constantly pumping as much water as can be physically extracted from the chalk with the recent average being 13 million litres per day. Their actions make the Ivel the 5<sup>th</sup> most over abstracted chalk stream in the world in 2025, before the new development has commenced.

The proposed Grand Union Canal effluent transfer scheme to relieve pressure on already overstressed chalk aquifers will not be operational until 2033. So where is the extra water going to come from to supply the Growing Baldock, Grange Estate and other local developments whilst alternative sources of water are being developed? The new demand for water will be immediate and as already stated local water supply operations are already causing large scale damage to the North Hertfordshire environment and biodiversity.

Affinity Water has repeatedly resisted suggestions that water from Grafham Water reservoir could be used to sustainably supply the Letchworth and Baldock areas with drinking water. The water transfer pipework to do this already exists and has been used in the past in times of shortage. Instead, this water has now been earmarked to supply Cambridge Water who have supply issues of their own but who will benefit from the proposed Fen Reservoir in the future. So where is the extra water going to come from to meet the immediate demand increase?

Sewage from the new developments will be treated at Letchworth Sewage treatment works. Whilst Anglian Water has confirmed they have capacity to treat the sewage, the Pix Brook into which the extra treated effluent will be discharged has well documented flooding problems. These will only be exacerbated by the extra volumes of sewage effluent from the Growing Baldock and other developments. The Resilient Together project has yet to come up with meaningful solutions to the Pix Brook flooding problems despite significant investment. The development will therefore undoubtedly make the Pix Brook flooding situation worse. This would appear to be in direct contradiction to **10.2.2** which states “When determining any planning applications, local planning authorities should ensure that flood risk is not increased elsewhere. “

New parts of the new sewerage system being constructed to serve the Growing Baldock development must not be fitted with overflows allowing emergency discharges to ground or surface waters. Telemetry must be provided on new pumping stations to alert of malfunction and extra emergency storage capacity should be provided to prevent discharge whilst repairs are being made, or tanker removal is being organised. New sewers must be constructed to prevent groundwater ingress throughout their lifetime.

Surface water from the Growing Baldock developments is to be dealt with by a mixture of soakaways from individual properties and Sustainable Urban Drainage systems (SuDS) from roads and hardstanding areas (e.g. swales, ditches and infiltration ponds). The planning application states that runoff rates will not exceed those from greenfield sites to mitigate downstream flooding. SuDS must be constructed to industry best practice in accordance with CIRIA SuDS manual C753. They must be adequately sized to deal with expected future maximum rainfall events (climate change adjusted) and must be distributed throughout the whole land parcel to maximise infiltration potential. A few questions arising include:

- where does the 1-in-100 year event plus 40% for climate change come from?  
**10.6.14**
- Who will be responsible for maintaining SuDS long-term (removing and disposing of accumulated sediment/vegetation)
- who pays for this SuDS maintenance? **10.6.22-**
- what does “the lifetime of this development” mean?

An example of good practice in this area would be [Lamb Drove, Residential SuDS scheme, Cambourne](#).

Other measures that should be adopted across all development sites should be the use of permeable surfacing wherever possible (to provide site-wide surface water infiltration and alleviate pressure on SuDS) and water harvesting (e.g. water butts / tanks) on all properties.

We are unclear from this document whether there will be any new surface water connections between any of the new development parcels to the river Ivel, either directly or via existing surface water sewers. If there are where will they be, and will they be fitted with flow control structures (e.g. hydrobrakes) to help preserve the constant flow regime of a chalk stream?

Petrol/oil interceptors must be fitted where communal parking areas meet number thresholds and clear maintenance responsibilities and schedules agreed in advance of their construction. Who will be responsible for maintaining these long-term and who pays? **10.6.24**

Surface water from “dirty” industrial or commercial areas which are at risk from contamination from day-to-day use must be connected to the foul sewer with the prior permission of Anglian Water Services. An example of this would be the proposed new waste handling and sorting operations or fuel/ chemical storage and washdown areas. Drains could be colour coded on new industrial areas to clearly distinguish between clean water/high risk of pollution (ending up in SuDS or groundwater) and foul water drains/lower risk of pollution ending up at Letchworth sewage works.

Chalk streams are very low energy systems and highly susceptible to pollution by sediments. Indeed, they are characterised by their gin-clear water free from suspended materials. Construction sites generate lots of sediment-rich water and runoff, particularly at times of wet weather, and chalk fines are particularly difficult to separate out from water.

Questions arising include:

- What management plan will be put in place to keep sediment from site dewaterings and runoff out of the river level system?
- What measures will be put in place to prevent sediment ending up in the river level?
- What limits will be set on the quality of runoff leaving the site during construction and by whom? Who will monitor the quality of surface water leaving the construction sites on a day-to-day basis and take appropriate action if problems are found.
- If road sweepers are to be used to keep existing and new highway areas free from mud and silt, where will they be offloading their contaminated loads in a way that will not pollute ground or surface water?