

Alex Howard  
North Hertfordshire District Council  
Planning Control & Conservation  
Council Offices Gernon Road  
Letchworth Garden City  
Hertfordshire  
SG6 3JF

**Our ref:** NE/2025/138187/04  
**Your ref:** 25/01196/FP  
**Date:** 2 December 2025

Dear Alex,

**Erection of two buildings including three units for Flexible Use Classes including Eg (ii) (iii), B2, B8, including servicing, parking, access, landscaping.**

**Starwood House, Avenue One, Letchworth Garden City, Hertfordshire, SG6 2HB.**

Thank you for re-consulting us on this planning application on 13 November 2025. We have reviewed the following documents as part of this consultation:

- TRC Technical Note – Starwood House, Condition 13, by TRC (31 Oct 2025).
- Remediation Strategy and Verification Report, by TRC (Ref: 000680199.0000.0002, Nov 2025, Rev. 2)
- Intrusive Geoenvironmental and Geotechnical Site Assessment, by TRC (Ref: 680199.0000.0001, Sep 2025, Rev. 3)

**Environment Agency position:**

We **maintain the position** set out in our previous letter dated 4 June 2025 (our ref: NE/2025/138187/01) and **we request that all six conditions outlined in that response are included in the final decision notice.**

In the technical note TRC requested that Condition 12 (monitoring and maintenance plan) on the draft decision notice for 25/01196/FP be discharged. Since a formal decision on this planning permission has not yet been reached and no discharge of condition application has been submitted, we will be treating this as a submission of information pursuant to our previously recommended Groundwater Monitoring and Maintenance condition.

Condition 12 follows from part 4 of Condition 10 (remediation strategy), and the request to discharge condition 12 therefore requires an assessment of whether the requirements of Condition 10 have been met. We have accordingly reviewed the above-referenced reports in the context of Condition 10 and the comments in our letter NE/2025/138187/03. Following this review our comments are as follows:

a) The supplementary investigations undertaken in the footprint of the existing building did not show elevated concentrations of contaminants in the tested soil samples. We welcome the inclusion of Polyfluoroalkyl Substances (PFAS) in the soil analysis suite and note that PFAS were not detected in the tested soils. However, we do not believe that testing of 4no arbitrary soil samples for PFAS adequately demonstrates that the development does not pose unacceptable PFAS risks for controlled waters. We consider that additional monitoring of groundwater in appropriate locations with testing for PFAS would help to resolve the uncertainty and should therefore be undertaken.

b) We request that the applicant also responds explicitly to our comments about investigations in the northwestern part of the site and about sampling of groundwater on the southern boundary of the site.

Based on the uncertainty about PFAS, as highlighted above, we do not believe it has been adequately demonstrated that groundwater monitoring and maintenance is not required and therefore consider it would be appropriate to include the monitoring and maintenance condition that we previously recommended.

**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.

Yours sincerely,

**Demetry Lyons**  
**Sustainable Places Planning Advisor**

Email: [hnl sustainableplaces@environment-agency.gov.uk](mailto:hnl sustainableplaces@environment-agency.gov.uk)  
Telephone: 020 7714 0578