

3rd July 2025

North Hertfordshire District Council

Attention Of: Alex Howard

Subject: Proposed Redevelopment of Starwood House, Letchworth
TRC Project Number: 631621.0000.0000

Dear Alex,

The following letter has been prepared in support of planning consultations associated with the redevelopment of Starwood House, Avenue One, Letchworth Garden City, Hertfordshire, SG6 2HB (referred to herein as the Site).

TRC has reviewed the letter dated 4th June 2025 from Demitry Lyons (Environment Agency (EA)) to Alex Howard (North Hertfordshire District Council) reference NE/2025/138187/01 regarding planning consultation for the Site. This letter intends to provide some initial responses to this consultation.

Firstly, it should be noted that the EA has only been given the opportunity to review TRC's Desk Based Geoenvironmental and Geotechnical Site Assessment. It would be beneficial for the EA technical team to review TRC's Intrusive Geoenvironmental and Geotechnical Site Assessment dated May 2025 to aid their understanding of ground conditions and environmental conditions at the Site. TRC consider that this will alleviate any initial concerns at this stage.

Below is a summary of the aforementioned report to aid consultation at this time:

TRC Intrusive Geoenvironmental and Geotechnical Site Assessment

TRC undertook an Intrusive Geoenvironmental and Geotechnical Site Assessment in May 2025. Three cable percussive boreholes were drilled to a maximum of 16.5 m below ground level (bgl) and nine window samples boreholes were drilled to a maximum of 5m bgl. The locations were placed across the Site to allow for good general coverage and to target potential areas of contamination around an above ground storage tank and off-site petrol station.

No visual or olfactory evidence of contamination was encountered during the ground investigation. Chemical analysis was undertaken on Made Ground and natural soils.

Six monitoring wells were constructed. Three were constructed in the deep cable percussive boreholes and three were in the shallower window sampling boreholes. Four rounds of groundwater and gas monitoring have been performed at these locations.

Made Ground was encountered across the Site from surface level to 0.2 to 0.8 m below ground level (bgl). Beneath this was reworked natural soils, which generally comprised brownish greyish white slightly clayey silty SAND. Sand was fine to coarse grained. Gravel was angular to sub-rounded fine to coarse chalk, brick, and concrete. Low cobble content of concrete was noted locally.

Beyond this, TRC encountered natural glaciofluvial deposits in three boreholes between 1.8m and 2.3 m bgl, which comprised orangeish brown slightly gravelly very silty SAND. Beneath this, at all locations, was the Holywell Nodular Chalk and New Pit Chalk Formation. This comprised structureless Chalk composed of cream with rare orange staining, slightly gravelly sandy clayey SILT.

Soil samples were collected during the investigation for environmental laboratory analysis. The soil analysis was compared against published Generical Assessment Criteria (GAC) for a commercial/ industrial end use. Minor concentrations of heavy metals, total petroleum hydrocarbons and polycyclic aromatic hydrocarbons were recorded. None of the concentrations detected exceeded the GAC in any of the samples.

Asbestos fibres were identified in two of the ten Made Gound samples analysed, with a maximum concentration of 0.003% fibres in soil.

Groundwater was not encountered and boreholes were recorded as dry on all monitoring occasions. It is expected that groundwater may be present within the deep Chalk bedrock at circa 19m based on previous works performed at the Site by Arcadis. TRC performed leachate analysis to evaluate whether there were mobile contaminants that could pose a leaching risk to deep groundwater. The leachate analysis showed exceedances of naphthalene and phenanthrene of the drinking water standards in one location (CP104). These are not considered to be a risk to groundwater at site due to the depth that the groundwater was encountered and the fact that these exceedances were marginal.

There were also exceedances of copper and mercury when compared to the environmental quality standards. The nearest surface water feature is a small pond (Western Lake) located 38m northwest of the Site. Western Lake sits above the level of the Site and considering that groundwater is circa 19m bgl, Western Lake is unlikely to be in hydraulic continuity with groundwater beneath the Site.

With respect to the proposed planning conditions recommended within the EA letter, TRC has provided comments below:

Condition 1 – Contaminated Land

TRC understands that the EA recommended draft condition is as follows:

No development approved by this planning permission shall commence until a remediation strategy to deal with the risks associated with contamination of the site in respect of the development hereby permitted, has been submitted to, and approved in writing by, the local planning authority. This strategy will include the following components:

1. A preliminary risk assessment which has identified:

- all previous uses*
- potential contaminants associated with those uses*
- a conceptual model of the site indicating sources, pathways and receptors*
- potentially unacceptable risks arising from contamination at the site*

2. A site investigation scheme, based on (1) to provide information for a detailed assessment of the risk to all receptors that may be affected, including those off-site.

3. The results of the site investigation and the detailed risk assessment referred to in (2) and, based on these, an options appraisal and remediation strategy giving full details of the remediation measures required and how they are to be undertaken.

4. A verification plan providing details of the data that will be collected in order to demonstrate that the works set out in the remediation strategy in (3) are complete and identifying any requirements for longer-term monitoring of pollutant linkages, maintenance and arrangements for contingency action.

Any changes to these components require the written consent of the local planning authority. The scheme shall be implemented as approved.

It is considered that parts 1 and 2 of this condition are already covered in part within the site investigation report prepared by TRC in May 2025 and summarised above. However, it is noted that further ground investigation is required within the building footprint area to provide additional coverage for both planning and design needs. The applicant is already planning for these works.

The data gathered to date does not indicate that there is a requirement for remediation. On this basis, TRC does not consider that a remediation strategy is required nor would a verification plan be required if no active remediation is being undertaken at the Site. TRC will advise the developer to implement a reactive discovery strategy during earthworks to ensure that any suspected contamination that has not been previously encountered is suitably investigated and, where required, subject to remediation.

Condition 3 – Long Term Monitoring

The EA recommended draft condition is as follows:

The development hereby permitted shall not commence until a monitoring and maintenance plan in respect of contamination, including a timetable of monitoring and submission of reports to the local planning authority, has been submitted to, and approved in writing by, the local planning authority. Reports as specified in the approved plan, including details of any necessary contingency action arising from the monitoring, shall be submitted to, and approved in writing by, the local planning authority.

Based on the information gathered during the intrusive ground investigation, TRC does not consider that long term monitoring is required at the Site due to the absence of significant contamination posing a risk to controlled waters or human health receptors. TRC's Intrusive Geoenvironmental and Geotechnical Site Assessment should be reviewed, it is anticipated that this will provide sufficient evidence that this condition should not be required.

Additional comments

The letter highlights the following on potential contamination at the Site:

Notwithstanding the preceding, we are aware that groundwater in this area is impacted by a range of substances including PFAS compounds, Cr (VI) and chlorinated solvents, and consider that the site poses a potential risk to groundwater for these substances. We expect these substances (as well as other potential contaminants of concern) to be adequately considered within the preliminary risk assessment, conceptual site model and future intrusive investigations.

Neither TRC nor Arcadis, who has undertaken previous intrusive investigation at the Site, has identified PFAS and chlorinated solvents as relevant contaminants of concern at the Site. As per the latest technical guidance published in Land Contamination Risk Management (LCRM), TRC has evaluated the history of land use and development at the Site to evaluate potential contaminant sources at the Site and at nearby properties that could affect the Site. The TRC and Arcadis assessments both found that the history of land use comprised

initial agricultural / undeveloped land, followed by metal engineering works with travelling crane and large yard area and most recently a datacentre / office building.

TRC performed analysis of soils and soil leachate for heavy metals, which included hexavalent chromium (Cr(VI)). The data did not indicate any detectable concentrations that could pose a risk to receptors.

Broader analysis of heavy metals and hydrocarbons detected only marginal exceedances of the published screening values for continued industrial land use. On this basis, no significant hazards have been identified that would trigger a requirement for remediation. Further assessment will be performed within the existing building footprint prior to development as noted previously.

PFAS and chlorinated solvents were not considered to be contaminants of concern from past land uses and as such were not scheduled as part of the laboratory suite of analysis. On this basis, TRC disagree with the EA comment that the Site may present a source of these contaminants. If the EA has knowledge of a local or regional issued posed by these contaminants it is requested this is shared so that further assessment can be undertaken to support their understanding of this locality and to enable TRC to understand how these potential contaminants could be affecting proposed development at this Site.

TRC would welcome the opportunity to discuss these matters further with the EA and planning team.

Yours sincerely,

TRC



Lauren Hall-Walsh

Principal Consultant