

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

Our ref: NE/2025/138187/03
Your ref: 25/01196/FP
Date: 15 August 2025

Dear Alex,

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

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

Thank you for re-consulting us on the above application on 29 July 2025, following the submission of additional information. As part of this consultation we have reviewed the following documents:

- Document titled 'GEO-ENVIRONMENTAL GROUND INVESTIGATION REPORT' by Arcadis (ref:30213868-AUK-XX-XX-RP-ZZ-0004-01-Phase2_GI_Report, dated: April 2025).
- E-mail from North Herts Planning (subject: RE: 25/01196/FP - Starwood House, dated: Wed 30/07/2025 12:43).

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 decision notice.**

We would also like to remind you that we suggested amendments to Condition 1 in our subsequent letter dated 21 July 2025 (ref: NE/2025/138187/02). The revised wording can be found in that response.

An explanation of why we continue to consider all six recommended conditions necessary is provided below.

Groundwater and contaminated land technical comments and reasoning around why conditions previously recommended should remain

Following a review of the applicant's responses to our previous comments, we note that detailed information about the previous uses of the Site in relation to the former

industrial works shown on historic maps has not been provided. Our understanding is that these works were ultimately used for the manufacture of Jones Cranes. We have located a Kryn and Lahy / Jones Cranes works plan listing the uses of former works buildings and other features shown on historic maps of the Site. It is relevant to note that the former works building in the footprint of the existing building is marked as a 'Crane Spray Paint Shop,' and that two large soakaways are indicated in the northwestern corner of the Site. We have also located anecdotal information supplied by the former works manager which indicates that the works discharged surface water to these soakaways via large sumps which were eventually emptied and backfilled with concrete during demolition works. This information is relevant to the contamination assessment for the Site and can be made available upon request for inclusion within the Preliminary Risk Assessment (PRA).

From our review of the document titled 'GEO-ENVIRONMENTAL GROUND INVESTIGATION REPORT' by Arcadis, we note that groundwater samples from 3no boreholes in the southwestern corner and the east of the site were tested for a relatively broad suite of substances including chlorinated solvents, and that elevated concentrations of contaminants likely to pose an unacceptable risk to controlled waters were not measured. We note that the groundwater elevation monitoring undertaken suggests north-westerly flow, but agree this seems counterintuitive given the presence of a public water supply abstraction at a short distance to the south. We note that the intrusive investigations undertaken in the northern part of the Site terminated at shallow depths on concrete obstructions and that groundwater and soils in this area were not sampled for laboratory analyses, although Photoionization Detector (PID) readings undertaken on shallow soils were low. We note that investigations were not undertaken in the footprint of the existing building on the site.

Based on the preceding and in line with previous comments we consider that there are gaps in the Conceptual Site Model (CSM) that need to be addressed. We have identified the following gaps, but this list may not be exhaustive, and we expect the applicant to undertake their own analysis:

- a) No investigations in the footprint of the existing building on the Site. It appears that the former works building in this area was used as a paint spray shop. Historic maps show a former tank adjacent to this works building;
- b) No sampling of groundwater, and minimal testing of soils, in the northwestern area. It appears that large soakaways that drained the historic works were formerly present in this part of the Site. Most investigations in this part of the Site terminated at shallow depth on concrete obstructions. The PID readings from this area may not provide a reliable indicator of Volatile Organic Compounds (VOCs) at depth due to these obstructions;
- c) No sampling of groundwater on the southern boundary of the Site except in the southwestern corner. This is the boundary facing the public water supply abstraction to the south;
- d) Limited testing for chlorinated solvents and no testing for Polyfluoroalkyl Substances (PFAS). We note that the testing undertaken for chlorinated solvents to

date did not show unacceptable impacts to soils or groundwater, however there are key areas where testing has not been undertaken. At this time, no information has been presented to us demonstrating that the former works did not undertake, or were highly unlikely to have undertaken, activities such as metal plating or finishing that may have used PFAS.

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,

Demitry Lyons
Sustainable Places Planning Advisor

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