

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

Our ref: NE/2025/138187/02
Your ref: 25/01196/FP
Date: 22 July 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 7 July 2025, following the submission of additional information. As part of this consultation we have reviewed the following documents:

- Letter titled 'Proposed Redevelopment of Starwood House, Letchworth' prepared by TRC (Project number: 631621.0000.0000, dated 3 July 2025).
- Document titled 'Intrusive Geoenvironmental and Geotechnical Site Assessment', prepared by TRC (ref: 631621.0000.0001, dated 21 May 2025).
- Document titled 'Desk Based Geoenvironmental and Geotechnical Site Assessment' prepared by (ref: 631621.0000.0000, dated 20.03.2025).

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.**

However, we consider that Condition 1 could be reworded to allow for the demolition of the existing building, if necessary, to facilitate investigations in that part of the site. Please see the reworded Condition 1 below, with the amended wording highlighted in bold.

For further information on why we believe the previously recommended conditions remain necessary, please refer to the section titled '*Groundwater and contaminated land technical comments and reasoning around why conditions previously recommended should remain*' in this response.

Condition 1 - Universal condition for development on land affected by contamination (reworded)

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No development approved by this planning permission, **other than demolition of the existing building on site**, 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.

Reason

To protect and prevent the pollution of controlled waters from potential pollutants associated with current and previous land uses in line with National Planning Policy Framework paragraphs 187, 196 and 197 and relevant position statements within the Environment Agency's Approach to Groundwater Protection.

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

1. The desk study and intrusive site investigation reports supplied by TRC are pertinent to Condition 1. The previous Arcadis reports, if made available, would also be relevant. It appears that the investigations undertaken to-date have not shown evidence of widespread gross contamination in those parts of the Site that have been investigated. However, there are areas that have not been investigated, and data gaps/uncertainties within the contamination assessments already undertaken.
2. We previously asked for further information about the potentially contaminative activities/processes undertaken historically on the Site and the chemicals formerly used/stored. New information has not been made available. The Site overlaps former metal, steel and engineering works active from pre-1992 to pre-1967. Historic maps show former buildings and structures within the footprint of the Site, the specific uses of which have not been explained. There is insufficient information about the substances previously stored within the tanks shown on these maps.
3. The intrusive investigations undertaken to date on this Site have not tested for Per- and Polyfluoroalkyl Substances (PFAS) or chlorinated solvents. We have concerns over this approach. The Site overlaps former metal, steel, and engineering works. In the absence of further information about the specific activities/processes undertaken historically on the Site and the chemicals used/stored, a robust approach

would be to test for a broad range of contaminants applicable to metal, steel, and engineering industries. Chlorinated solvents are relevant since they can be used within metal fabrication and engineering industries, for example as cleaning/degreasing agents. PFAS are also relevant since they can be used within metal manufacturing and finishing industries for incorporation into specialist coatings, aqueous dispersion, and powder coatings, and can also be used within mist suppressants for chrome plating and within fire-fighting systems. We are aware of PFAS and chlorinated solvent impacts to the Chalk aquifer beneath the Letchworth industrial estate, and are engaging with the Local Authority and with other stakeholders who are being impacted by such contamination. Regardless, because of the association of the Site with relevant industries active post-1940, and the paucity of detailed information about the previous uses of the Site, we consider that it would be reasonable to include PFAS compounds and chlorinated solvents on the list of potential contaminants of concern. Nevertheless, we are willing to reassess our position on this point, should the applicant make new relevant information available for subsequent consultations.

4. We previously advised that the Arcadis reports referred to within the TRC documents should be made available if the findings are to be used to inform or support the contamination assessment for the Site. The reports have not been supplied.

5. We understand that two underground storage tanks apparently used for storage of diesel were decommissioned on the site in 2017 and that Arcadis undertook soil sampling during the decommissioning process. The documentary evidence for these works has not been supplied and should be made available.

6. Historic maps show a former tank on the northwestern boundary of the Site which appears not to have been targeted by investigations to date. We consider that this location should be targeted. The applicant should endeavour to obtain information about the substances stored within the tank to inform the investigation strategy.

7. No investigations have been undertaken in the footprint of the existing building on the Site. Historic maps show a former steel and engineering works building in this area, and a former above-ground storage tank adjacent to the building. Intrusive investigations are required to address this data gap. Given the high groundwater sensitivity of the Site (SPZ1) we consider that it would be prudent to control these works via a pre-commencement condition. Condition 1 as amended in this letter would allow demolition of the existing building on the Site to facilitate these investigations. The applicant should endeavour to obtain further information about the former works, and about the former contents of the tank, and use this to inform the design of the investigation strategy.

8. It is considered within the TRC reports that the groundwater flow direction at the Site is to the northwest. Site-specific groundwater elevation data and plots to substantiate this assumption have not been provided. Nevertheless, assuming that groundwater does flow to the northwest, then the monitored Arcadis boreholes are located towards the upgradient of boundary of the Site, and upgradient of potential sources such as former tanks and industrial buildings. The significance of the Arcadis groundwater chemistry data, if these are made available to inform the risk

assessment and CSM for the Site, should be evaluated within this context. With regard to further groundwater investigations, due consideration should be given to the site-specific groundwater flow direction and the resting groundwater levels when designing and siting boreholes. It appears that the TRC monitoring boreholes are not suitable for investigations of groundwater within the Chalk aquifer since the response zones are above the resting groundwater level.

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

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