

Hertfordshire County Council
Spatial Planning & Economy Unit
County Hall
Pegs Lane
Hertford
SG13 8DN

For the attention of: Chey Dempster

By post and e-mail

13 August 2018

Dear Sirs

Application reference PL\0755\16 for the establishment of a new quarry on land at the former Hatfield Aerodrome by Brett Aggregates Limited

Affinity Water is appointed as water undertaker under the Water Industry Act 1991. It provides drinking water to approximately 3.6 million customers in parts of North London and the Home Counties and to customers in the Dover and Folkestone and East Tendring areas.

We have a statutory duty under section 37 of the Water Industry Act 1991 to develop and maintain an efficient and economical system of water supply and to ensure that all necessary arrangements have been made for providing supplies of water and for maintaining, improving and extending our water mains and other pipes.

The proposed new quarry referenced above is located within our Central region. The water we supply in this area is abstracted from groundwater sources and we have abstractions that could be affected by the proposed development.

Please treat this letter as an objection to this application, pending resolution of the detailed controls necessary to ensure that the proposed quarrying activities pursuant to the proposed permission do not affect the mobilisation of the existing plume of bromate contamination, and thereby render the water currently abstracted by Affinity Water at our Tyttenhanger and Roestock Chalk groundwater sources unfit for public water supply purposes.

This plume is the subject of a long-standing management regime pursuant to a remediation notice under the Environmental Protection Act 1990 which could be interfered with if appropriate monitoring and controls of the quarrying activities are not in place. Under the current management regime, Affinity Water abstracts from "scavenging" boreholes at Bishops Rise, Hatfield to manage the existing bromate plume present within the chalk groundwater so as to limit the movement of the plume into existing public water supplies further down-hydraulic gradient (i.e. our Essendon source and a number of Thames Water sources). The contaminated water which is "scavenged" is treated and disposed off to the sewerage system, so is not used for the purposes of public supply. The proposed quarrying activities may adversely affect this long-standing management regime.

Our Tyttenhanger and Roestock sources are to the south of the existing location of the plume and are outside of its area of influence. There is a risk that quarrying activity could direct the plume towards the south impacting on existing public water supplies at Tyttenhanger and Roestock. They are

important and long standing public water supply sources, and it is essential that an appropriate regime is in place to avoid the proposed quarrying activities impacting on the protection of the supply sources from the bromate plume. It is therefore critical that this matter is fully resolved before any permission is granted.

We wish to discuss with you the mechanisms available within the proposed planning condition(s) and/or a section 106 agreement in this regard. In addition, we are seeking to enter into a private agreement with the applicant/operator, and have had a constructive meeting with the applicant on 16 July with a view to the negotiation of such an agreement, prior to the grant of any planning permission. We acknowledge that the applicant is keen to avoid any mobilisation of the plume and is acting entirely responsibly in its discussions with us.

We are currently reviewing the draft Groundwater Management Plan (GWMP). However, this will need to be an unusually sophisticated plan to cope with complexities of situation, and will need to be the subject of full and careful consideration by Affinity and the Council.

The draft GWMP currently provided for comment by the applicant will need to be updated to reflect the outcome of the additional pumping test it carried out recently. Affinity Water (at the meeting on 16 July) also explained to the applicant that further work was required to understand the impact of the proposed quarrying activities on its management of groundwater through the existing scavenging boreholes. The assessment work needs to consider the impact of the proposed quarrying activities against maximum scavenging abstraction rates by Affinity Water, and what the in-combination impacts of abstraction would be on local chalk groundwater contours. Once that work has been carried out, the draft GWMP will need to be revised and reissued. It is Affinity Water's view that planning permission should not be granted until that draft GWMP has been agreed with Affinity Water including details for ensuring the effective monitoring of groundwater contours during the life of the quarrying activities under the proposed planning permission.

Please can you confirm that the permission will not be granted until these matters have been fully resolved and the necessary agreement(s), planning condition(s) and draft GWMP pursuant to the permission have been agreed with us.

Yours faithfully

A handwritten signature in black ink, appearing to read "Julie Smith", written in a cursive style.

Julie Smith
Head of Legal Services

Tel Number: 01707 277194

Email address: julie.smith@affinitywater.co.uk