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County Hall Pegs Lane  
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SG13 8DN

**Our ref:** NE/2018/128672/02-L01  
**Your ref:** PL\0755\16  
**Date:** 3 January 2019

Dear Chay

**Land at Hatfield Aerodrome, Off Hatfield Road**

**Discharge of condition 31 - groundwater management plan.**

Thank you for consulting us on the new Groundwater and Water Management Plan. Prepared for Brett Aggregates Limited by SLR Consulting Limited. SLR Ref: 403.01009.00190. DRAFT Version 3. Date: November 2018.

The document is submitted as a discharge of condition and the title and introduction of the main report are phrased in terms of the planning having been granted. The document may need to be updated once any decision notice is final, to ensure it reflects the correct planning condition numbers and the wording of the planning conditions.

We support the proposal presented in section 1.2.2, that states:

*"This is an initial water management plan and provides an overview of how water will be managed during the development of the site. It is proposed that prior to the commencement of mineral extraction in each phase a phase specific water management plan will be prepared and submitted to the Mineral Planning Authority."*

We also support the arrangements presented in Section 2.2.2 that the Lower Mineral Horizon will only be pumped in small areas within each phase following consultation with key stakeholders and the approval of Brett Aggregates Managing Director and provided there is capacity in the Lower Mineral Lagoon, and that water levels in the Upper Mineral Lagoon remain 1 metre or more higher than water levels in the Lower Mineral Lagoon.

We welcome the changes that have been made to Section 2.3 Infiltration Lagoons to clarify which water will flow into which lagoon and to emphasise the importance of segregating waters from the upper and lower mineral horizons.

We also welcome the insertion of Section 2.3.1 Lagoon Maintenance, in particular that it will be a topic for the proposed regular meetings with stakeholders.

We do have the following queries:

1. Will there be different pipelines conveying water across the site from the upper and

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lower mineral horizons and if s will these will be clearly marked to avoid misconceptions? Similarly, will the Diverted River Nast culvert, presented in part 6 of Section 2.3.3 Operational Water Management, be a separate pipeline to avoid confusion with the back-drain within the engineered buttress?

2. If the River Nast is flowing then groundwater in the Upper Mineral Horizon will be very shallow. Will this be the level of the back-drain? The drawing entitled INFILTRATION LAGOONS & BUTTRESS SCHEMATIC SECTIONS doesn't indicate levels with respect to Ordnance Datum. Is there a different drawing which indicates this?

We appreciate the revision of Section 2.3.5 Lagoon Discharge Management to emphasise the importance of segregating waters from the upper and lower mineral horizons and I take point 3 to mean approval in writing from the Managing Director.

As stated in 128672/01, we are reassured that the regular performance reviews and progress meetings with key stakeholders are now proposed for the duration of the development, as presented in 2.3.6 Performance Reviews and Progress Meetings. Thank you for expanding on the environmental and operational factors and the system performance topics that may be discussed. We agree with the statements that *"There will be 6 monthly review meetings for the duration of the development. ... It is proposed that these meetings are attended by the Environment Agency, Herts CC and Affinity Water. The frequency of these meetings will not be reduced unless all parties agree and additional meetings or sharing of data will occur as and when required to discuss any issues that arise, significant changes in monitoring results, or proposed significant changes to operational practice."*

We are reassured that throughout the document it is stated that the construction of buttresses and bunds etc. will be constructed to accepted industry standards and subject to CQA.

Section 3.2 Monitoring Locations and Sampling Schedule includes an "Error! Reference source not found." which should be rectified in subsequent versions.

We support the inclusion of section 3.2.1 Water Level Monitoring and the proposed use of data loggers in boreholes and water level loggers in each of the lagoons.

The revisions to Table 3-1 Groundwater and Surface Water Monitoring Plan are helpful for clearly showing monitoring purpose and analytical suite. However, the footnotes are a little confusing. They begin at '3', the 'key' in the footnotes includes 2 'A's:

- A – *Additional voluntary monitoring*
- A – *Annual*

and possibly some of the footnotes duplicate the information in the columns.

The inclusion of Table 3-2 Groundwater and Surface Water Analysis Suites and revisions to Table 3-3 Groundwater and Surface Water Analysis Suites are also helpful.

We are reassured to see that 3.4 Monitoring and Reporting Programme includes the statement that *"provision is made to continue the approved monitoring (i.e. permit requirements and this GWMP) for a period of 10 years post closure."* We are also satisfied to see that this section includes more specific details on the submission of monitoring reports, when, to whom and under which regime. This section now appears to incorporate Section 3.6 Data Distribution from the previous draft of the document, which we note is absent from this version. This is acceptable as long as all the information the old section 3.6 contained is amalgamated into other sections of this

report.

Section 3.5 Contingency Actions includes a broken reference link - *Error! Reference source not found* which should be rectified in subsequent versions.

Should you have any queries please contact me.

Yours sincerely

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