

Leanne Palmer  
The Planning Inspectorate  
The Square Temple Quay  
Bristol  
Avon  
BS1 6PN

**Our ref:** AE/2024/129113/01-L01  
**Your ref:** S62A/2023/0031  
**Date:** 22 January 2024

Dear Leanne

**(SECTION 62A APPLICATIONS) THE ERECTION OF UP TO 55 DWELLINGS,  
ASSOCIATED LANDSCAPING AND OPEN SPACE, WITH ACCESS FROM KNIGHT  
PARK**

**LAND NORTH OF THAXTED ROAD, SAFFRON WALDEN**

Thank you for the consultation dated 02 January 2023. We have reviewed the documents as submitted and have no objection to this proposal. We have contained some information relating to previous contamination on this site, and Water Resources issues in the region. Please see the relevant sections below.

**Groundwater Protection**

This site is located within an area of ground vulnerability: a Principal Aquifer and Source Protection Zone 3 (SPZ). The Phase 1 Geo-Environmental Desk Study, undertaken by Rolton Group Ltd, identifies that a previous historic use of this site was a cement works. This is, as defined by CL:AIRE DoE Industry Profiles, a previously contaminating use.

Ordinarily we would wish to review the submitted contamination assessment. However, we have significant resource pressures and do not currently have the capacity to technically review the submissions.

We would encourage your Authority in discussion with your Environmental Health Team to ensure the developer has addressed risks to controlled waters from contamination at the site through relevant planning conditions having fully considered the guidance below.

We hope to be in a position in the future, to review the discharge of conditions with respect to controlled waters, that your Authority appends to your Decision.

Please consult our technical appendix for further information regarding our position and additional information / advice to yourselves and the applicant.

**Water Resources**

We have evidence which indicates that groundwater abstraction to meet current needs of the population is already in some cases causing ecological damage to Water Framework Directive designated waterbodies (including chalk streams where applicable) or there is a risk of causing deterioration in the ecology if groundwater abstraction increases. This development has the potential to increase abstraction from groundwater sources. You should consider whether the water resource needs of the proposed development alone, and in-combination with other proposed development that the relevant water company is being asked to supply, can be supplied sustainably without adverse impact to WFD waterbodies and chalk streams. At the present time we are unable to advise with confidence that further development will not harm the water environment, until it can be shown sustainable water supplies can be provided. We are working with the water companies and reviewing their draft Water Resources Management Plan to address this issue.

You must have regard to River Basin Management Plans and be satisfied that adequate water supply exists to serve development, in accordance with the policies of your Local Plan. Any surplus in water companies' current WRMP is subject to further consideration of whether it can be taken without causing environmental deterioration.

Your authority should ensure that the local Water Recycling Centre has sufficient capacity to accept foul drainage from the proposed development to ensure protection of the water environment including WFD waterbodies.

### **Residential Development**

The location of this development is in an area of serious water stress (as identified in our report [Water stressed areas - final classification](#)). Across East Anglia we are also concerned that the rivers and groundwater including chalk streams are vulnerable to deterioration under Water Framework Directive, from groundwater abstraction. As a minimum, the higher standard of a maximum of 110 litres per person per day should be applied to this development as set out in the [the Building Regulations &c. \(Amendment\) Regulations 2015](#). The applicant should consider if a higher standard of water efficiency could be achieved, looking at all options including rainwater harvesting and greywater systems.

Should the development be permitted, we would expect you to ensure that the new buildings meet the highest levels of water efficiency standards, as per the policies in the adopted local plan.

### **Advice to applicant**

Research has shown that it could cost as little as £6-9 per home to reach the more ambitious level of 110l/p/d. In addition, building water efficiency measures in to the development will lead to a reduction in water bills.

Using the water efficiency calculator in Part G of the Building Regulations a developer can calculate the devices and fittings required to ensure a home is built to the right specifications to meet the 110 requirement. The calculator can be found here:

[https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment\\_data/file/504207/BR\\_PDF\\_AD\\_G\\_2015\\_with\\_2016\\_amendments.pdf](https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/504207/BR_PDF_AD_G_2015_with_2016_amendments.pdf)

We trust this advice is useful.



**Mr Jack Saunders**  
**Sustainable Places - Planning Advisor**

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## Technical Appendix

### **Sustainable Drainage Systems (SuDS) informative**

1. Infiltration sustainable drainage systems (SuDS) such as soakaways, unsealed porous pavement systems or infiltration basins shall only be used where it can be demonstrated that they will not pose a risk to the water environment.
2. Infiltration SuDS have the potential to provide a pathway for pollutants and must not be constructed in contaminated ground. They would only be acceptable if a phased site investigation showed the presence of no significant contamination.
3. Only clean water from roofs can be directly discharged to any soakaway or watercourse. Systems for the discharge of surface water from associated hard-standing, roads and impermeable vehicle parking areas shall incorporate appropriate pollution prevention measures and a suitable number of SuDS treatment train components appropriate to the environmental sensitivity of the receiving waters.
4. The maximum acceptable depth for infiltration SuDS is 2.0 m below ground level, with a minimum of 1.2 m clearance between the base of infiltration SuDS and peak seasonal groundwater levels.
5. Deep bore and other deep soakaway systems are not appropriate in areas where groundwater constitutes a significant resource (that is where aquifer yield may support or already supports abstraction).
6. SuDS should be constructed in line with good practice and guidance documents which include the SuDS Manual ([CIRIA C753](#), 2015) and the [Susdrain website](#).

For further information on our requirements with regard to SuDS see our Groundwater protection position statements (2017), in particular Position Statements G1 and G9 – G13 available at: <https://www.gov.uk/government/publications/groundwater-protection-position-statements>

### **We recommend that developers should:**

- 1) Refer to our '[Groundwater Protection](#)' website;
- 2) Refer to our [Land Contamination: Risk Management website when dealing with land affected by contamination](#). This is based on CLR11 which is archived within [CL:AIRE Water and Land Library \(WALL\)](#), and also includes the [Guiding Principles for Land Contamination](#) for the type of information that we require in order to assess risks to controlled waters from the site. The Local Authority can advise on risk to other receptors, for example human health;
- 3) Refer to our [Land Contamination Technical Guidance](#);
- 4) Refer to '[Position Statement on the Definition of Waste: Development Industry Code of Practice](#)';
- 5) Refer to British Standards BS 5930:1999 A2:2010 *Code of practice for site investigations* and BS10175:2011 A1: 2013 *Investigation of potentially contaminated sites – code of practice*

6) Refer to our '[Piling and Penetrative Ground Improvement Methods on Land Affected by Contamination](#)' National Groundwater & Contaminated Land Centre Project NC/99/73. The selected method, including environmental mitigation measures, should be presented in a 'Foundation Works Risk Assessment Report', guidance on producing this can be found in Table 3 of '[Piling Into Contaminated Sites](#)';

7) Refer to our '[Good Practice for Decommissioning Boreholes and Wells](#)'.

8) Refer to our '[Dewatering building sites and other excavations: environmental permits](#)', guidance when temporary dewatering is proposed

**The Environmental Permitting Regulations make it an offence to cause or knowingly permit any discharge that will result in the input of pollutants to surface waters or groundwater.**