

Ms Briony Franklin
Royal Borough of Windsor &
Maidenhead
Development Control
York Stream House St. Ives Road
Maidenhead
Berkshire
SL6 1QS

Our ref: WA/2018/124800/01-L01
Your ref: 18/00057/FULL
Date: 09 February 2018

Dear Ms Franklin

**Change of use of land to provide an extension to existing churchyard.
St John the Baptist, Eton Wick Road, Windsor, Windsor and Maidenhead,
SL4 6JA.**

Thank you for your consultation, which we received on 23 January 2018.

Environment Agency position

We **object** to the planning application, as submitted, because the proposed development would pose an unacceptable risk of pollution of groundwater. We recommend that planning permission should be refused on this basis, in line with paragraph 109 of the National Planning Policy Framework and saved policy NAP4 of Windsor and Maidenhead's Adopted Local Plan.

Reason

Groundwater is particularly sensitive in this location because the proposed development site:

- is within Source Protection Zone 2 (SPZ2)
- is located upon a Principal aquifer

We consider that the proposed development poses an unacceptable risk of causing a detrimental impact to groundwater quality because:

- it presents a risk of pollution to groundwater supplies
- the proposed graves do not have at least 1 metre clearance between the base of the grave and the top of the water table.

Further information

An intrusive site investigation was carried out by Jomas in May 2016 and three window sample boreholes were installed on site. The standing water has been measured at between 1.3 and 1.7 m below ground level (bgl). Since a single burial is generally at a depth of 1.8 m bgl, the site investigation results suggest that burials will be into standing

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water. Since at least 1 metre clearance between the base of the grave and the top of the water table has to be maintained the proposal to inter human bodies on this parcel of land is unacceptable.

The draft Burial Management Plans submitted with this document suggests a condition that:

No burials will take place into standing water. This may limit the depth at certain times after heavy or prolonged rain or on occasion may delay a funeral until water has receded.

By suggesting that the actual burial ceremony should be delayed until the water level drops, the Burial Management Plan misinterprets the guidance. The water table fluctuates seasonally and this is why the guidance also says that at least 1 metre clearance has to be provided between the base of the grave and the **top** of the water table. The top of the water table means the maximum water table level. Interring the body under the water table at any time of the year will lead to pollution of groundwater.

This cemetery extension is located over the Shepperton Gravel Member (Principal aquifer) which overlays the London Clay (Unproductive stratum) and this gravel aquifer needs to be protected with respect to groundwater quality. This site is within a SPZ2 for the potable water supply (PWS) at Eton. The borehole records for Eton PWS show that wells extend into the Chalk (confined under the London Clay) however, the information from the SPZ modelling for this potable supply indicates the bulk of the abstraction is from the Shepperton Gravels. The site is also within the flood plain of the River Thames and groundwater (water table) in the gravels is likely to be shallow. Since this site is within a SPZ2, burials most not be into groundwater at any time of the year.

Our approach to groundwater protection is set out in section 'Human and animal burials: minimum groundwater protection' on the Gov.uk website.

<https://www.gov.uk/guidance/cemeteries-and-burials-prevent-groundwater-pollution>

Final Comments

Once again, thank you for contacting us. Our comments are based on our available records and the information as submitted to us. Please quote our reference number in any future correspondence.

Please provide a copy of the decision notice for our records. This would be greatly appreciated.

If you have any queries regarding this letter please do not hesitate to contact me.

Yours sincerely

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Planning Advisor

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cc Carter Planning Ltd

