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MK45 2ND

**Our ref:** SV/2016/109185/01-L01  
**Your ref:** 161017/RD05  
**Date:** 16 November 2016

Dear Dr. Earl

**PROPOSED EXTENSION AT LEOMINSTER CEMETERY, LEOMINSTER,  
HEREFORDSHIRE**

I am writing in response to your request for pre-planning advice which was received on 11 October 2016. I would offer the following Preliminary advice based on the information provided at this time:

**Groundwater Protection:** According to the Agency's "Groundwater Protection Policy & Practice" the proposed cemetery extension is located on a "Secondary" aquifer (Raglan Mudstone Formation). Lying directly underneath this is Siltstone and Mudstone interbedded.

There are no abstraction licences used for public water supply based on our records. However, there may be private water supplies in the area, records of which may be held by your Public Protection team. The applicant is advised to contact British Geological Society (BGS) for records of any boreholes etc; and make enquiries with adjacent properties and landowners.

**Planning Application requirements:** The National Planning Policy Framework (NPPF) supports the protection and enhancement of natural and local environments with planning decisions to ensure that new development is 'appropriate for its location' (paragraphs 109 and 120).

Due to changes in our working practices, and the low risk nature of the proposals, we would no longer make bespoke comments at the planning application stage but offer standard comments to assist the Local Planning Authority (LPA) in their consideration of the application. To inform your submission we would offer the following:

We note that a Tier 1 Hydrogeological Risk Assessment (Ref: TGMS0982.2) has been submitted which confirms that the new cemetery extension will:

- not be within Source Protection Zone 1, or be at least 250 metres from a well, borehole or spring used to supply water that is used for human consumption, of for use in dairy farms, whichever is the greater distance;
- be at least 30 metres from any other spring or watercourse and at least 10 metres from any field drain;
- have at least one metre of subsoil below the bottom of the burial pit, allowing a hole deep enough for at least one metre of soil to cover the carcass;
- have at least one metre of unsaturated zone (the depth to the water table) below the base of any grave. Allowance should also be made to any potential rise in the water table (at least one metre should be maintained)

In recognition of the above we would consider the site acceptable in principle. The LPA may wish to impose a planning condition on any forthcoming application to secure the above-mentioned controls.

We recommend that reference should be made to cemetery section in the Environment Agency's Groundwater Protection: Principles and Practice and information on the Natural Death Centre

**Informative:** Operators of cemeteries should take appropriate measures to manage their sites to ensure they do not cause an unacceptable risk to groundwater quality. The Environment Agency has powers under the Environmental Permitting Regulations 2010 to take action where groundwater pollution occurs, or is likely to occur.

If pollution was to occur, Section 161, Water Resources Act 1991 empowers us to recover all costs reasonably incurred in:

- carrying out works, operations or investigations to prevent pollution of surface waters or groundwater;
- undertaking remedial action following a pollution of surface waters or groundwater.

Should we be required to undertake such work we would be able to recover these from the company or person responsible.

I trust the above is of assistance.

Yours sincerely

**Mr. Graeme Irwin**

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