

Mr Darryl Kelly
The CDS Group
Building 51 Wrest Park
Silsoe
MK45 4HS

Our ref: AC/2022/131321/03-L01
Your ref: ENVPAC/1/EAN/00484
Date: 07 February 2025

Dear Mr Kelly

**PROPOSED POTENTIAL NEW CEMETERY SITE - T3 GROUNDWATER RISK
ASSESSMENT REPORT REVIEW**

COTTAGE BOTTOM FIELD, DUNSTABLE ROAD, CADDINGTON, LU1 4BB

Thank you for asking us to review the Groundwater Risk Assessment Report for the proposed cemetery at Cottage Bottom Field, Caddington. We have undertaken this work under our agreed cost recovery programme ENVPAC/1/EAN/00484.

We have reviewed the following document for this consultation:

- CDS. T3 Groundwater Risk Assessment Report for Dunstable Town Council . 28-06-2024

Our comments on the above-referenced report are as follows:

The T3 groundwater risk assessment is acceptable. The proposed cemetery development would require planning permission. It would also require an environmental permit to operate unless it can meet all of the exemption conditions for low environmental risk cemeteries. The groundwater risk assessment must be submitted in support of both planning and permitting applications.

With reference to the [Low Environmental Risk Cemeteries: Exemption Conditions](#) guidance, and the information provided, we have identified that condition 12 would not be met as the estimated annual burial rate of 110 exceeds the limit of 30 for a cemetery upon a principal aquifer. Furthermore, we consider that ongoing groundwater monitoring would be required, hence condition 14 would also not be met.

It seems likely that a bespoke permit would be required due to the need for ongoing groundwater monitoring. Standard rules permits for cemetery developments are not currently available.

More information on permitting requirements for new cemeteries can be found at:
[Protecting groundwater from human burials - GOV.UK](#)

We trust this advice is useful.

Yours sincerely

A handwritten signature in black ink, appearing to read 'AH-Cole', written in a cursive style.

Mr Alasdair Hain-Cole
Planning Advisor

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