

Subject: FW: [F/24/97312] Land adjoining 4 Brookfield, Providence Hill, Bursledon - contaminated land comments

Sent: Wednesday, May 22, 2024 7:44 PM

Subject: [F/24/97312] Land adjoining 4 Brookfield, Providence Hill, Bursledon - contaminated land comments

Hi Rebecca,

Thanks for consulting the Pollution Team on the planning application F/24/97312 for the Construction of Residential Care Community, comprising a 73-bed care home (Use Class C2) and 5 x 2-bedroom close care cottages (Use Class C3 age restricted), with associated access, internal access road, parking, landscaping and infrastructure at the site known as Land adjoining 4 Brookfield, Providence Hill, Bursledon. Please see my comments in regards contaminated land only:

The application is supported by the following report:

Brookfield, Providence Hill. Preliminary Risk Assessment report produce by WSP (March 2024), reference: 70122557-PRA-R01

Considering the above, I have the following observations:

- A review of the site history indicates that the area has been undeveloped until 1960, when some buildings and outbuildings were noted.
- The site walkover confirmed previous buildings and outbuildings were demolished recently. An excavator was observed clearing the perimeter. A drainage ditch was noted along the north. A former burning area was observed (identified in previous investigations). No asbestos containing material were observed. Previous investigations indicate part of the site was used for growing berries and pesticides were utilised.
- The current report references a ground investigation undertaken by Opus 2017, comprising 7 windowless sampling boreholes, 6 trial pits and 4 shallow pits. Ground conditions encountered during this investigation were: Topsoil/ Made Ground to 0.80mbgl (asbestos and other materials noted at TP05). Former contamination in areas SP1 to SP4 targeting bonfire areas. The underlying conditions were silty sandy clay with thick bands of gravel. Groundwater noted between 2.10-3.0mbgl. The investigation concludes that a hotspot of lead and arsenic at SP2. Pesticides test in topsoil were below the GAC. No asbestos detected. Ground gas monitoring conducted between February and May 2017 shows concentrations of CO2 between 4.2-11.3%. No gas flow was detected. However, the assessment concludes that Amber 1 conditions apply due to concentration of CO2 and therefore gas measures are required. The site is not within a radon risk area.
- WSP considered that further characterisation for leachate and groundwater sampling are required, along with update results according to current GACs and further ground gas monitoring.
- The current report presents a CSM, with identified onsite sources of contamination as made ground from former buildings and out buildings, residues from bonfires, former agricultural use, fly-tipping; and off-site sources as landfill, made ground, gasoil tank located in the vicinity of the site.
- The risk assessment indicates Moderate risks to human health from asbestos in shallow soils, low to moderate risks from contaminants in shallow soils, ground gas and vapours. In addition, the risks to groundwater and surface water bodies are considered to be Low to Moderate.
- WSP recommended that further investigation is required, including further characterisation of ground conditions, soil and groundwater sampling, and groundwater and ground gas monitoring.

The report does not make any reference to any re-use/ importation of soils and any waste management.

In conclusion, we agreed with the findings of the report (although I consider ground gas risk should be updated to moderate due to gas concentrations, potential made ground on site and potential migration of gases from the landfill to the north).

We do not support the proposed development until additional information is provided to the LPA, this should include:

- Additional ground investigation report addressing the finding of the WSP 2024 report.
- Remediation Method Statement
- Construction Environment Management Plan

We suggest the following conditions to be applied:

Condition A: Contaminated land

No work shall commence on site until the following has been submitted to, and approved in writing by the LPA:

- a. An updated report of a site investigation (including an amended site plan, site investigation and risk assessment and any subsequent mitigations as a result of findings) documenting the ground conditions of the site and incorporating chemical and gas analysis in accordance with UK Land contamination risk management (LCRM) national guidance, and BS10175:2011+A2:2017, and BS 8576:2013, BS 8485:2015+A1:2019, Claire RB17, CIRIA C665 and as agreed with the LPA. This document should also include reference to the agreed Preliminary Risk Assessment (WSP, 2024).
- b. a detailed site-specific scheme for remedial works and measures to be undertaken to avoid the risk from contaminants and/or gases when the site is developed and proposals for future maintenance and monitoring. Such a scheme shall include nomination of a competent person to oversee the implementation of the works.

Reason: To minimise the risk from land contamination for the safety of the future occupiers of the development.

Condition B: Verification Report

The development hereby permitted shall not be occupied / brought into use until there has been submitted to the LPA verification by the competent person approved under the provisions of condition A(b) that any remediation scheme required and approved under the provisions of condition A(b) has been implemented fully in accordance with the approved details (unless varied with the written permission of the LPA in advance of implementation).

Unless agreed in writing with the LPA such verification shall comply with UK Land contamination risk management (LCRM) and the guidance contained in EA Guidance for the Safe Development of Housing on Land Affected by Contamination - R&D Publication 66: 2008. Typically such a report would comprise:

- a. a description of the site and its background, and summary of relevant site information,
- b. a description of the remediation objectives and remedial works carried out.
- c. verification data, including - data (sample locations/analytical results, as-built drawings of the implemented scheme, photographs of the remediation work in progress, etc.
- d. Certificates demonstrating that imported and/or material left in situ is free from contamination, confirmation of material removal, gas/vapour membranes have been installed correctly.

Thereafter the scheme shall be monitored and maintained in accordance with the scheme approved under condition A(b)

Reason: To minimise the risk from land contamination for the safety of the future occupiers of the development.

Condition C: CEMP

No construction or site preparation works involving excavation shall start until a Construction Environment Management Plan (CEMP) has been submitted to, and approved in writing by, the Local Planning Authority. Preparation and construction work shall only take place in accordance with the approved CEMP which shall include:

- a) the location of temporary site buildings, compounds, construction material and plant storage areas used during demolition and construction;

- b) the arrangements for deliveries associated with all construction works, loading/ unloading of plant & materials and restoration of any damage to the highway [including vehicle crossovers and grass verges].
- c) the parking of vehicles of site operatives and visitors;
- d) measures to control the emission of dust and dirt generated by demolition and construction;
- e) a scheme for controlling noise and vibration from demolition and construction activities (to include piling);
- f) provision for storage, collection, and disposal of rubbish from the development during construction period;
- g) measures to prevent mud and dust on the highway during demolition and construction;
- h) the erection and maintenance of security hoarding including decorative displays and facilities for public viewing, where appropriate;
- i) temporary lighting;
- j) protection of pedestrian routes during construction;
- k) temporary surface water drainage provisions; and
- l) hours of working

Reason: To limit the impact the development has on the amenity of the locality and to protect biodiversity

I trust the information above is of assistance. If you have any further queries, please do not hesitate in contacting us.

Best regards,

Yacklin

Yacklin Panza

Pollution Control Specialist

Planning & Environment - Pollution