

Memorandum

From: Pollution Control

To: Development Management

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FAO: Summer Sharpe

Our Ref: PR202312-102264

Your Ref: O/23/96432

Date: 26 January 2024

Site Address: Land to the west of Cobbett Way, Botley

Proposal: Outline application for residential development of up to 34 dwellings and associated infrastructure (access only to be considered).

Thank you for consulting this Service on the above application. We have reviewed the following information provided the application mentioned above:

- RTPI Chartered Town Planners (October 2023). *Land off Cobbetts Way. Outline application with all matters reserved (except for access) for residential development up to 34 dwellings and associated infrastructure. Planning statement incorporating affordable housing statement. Version 1.*
- Cooper Baillie Ltd. (June 2023). *Land off Cobbett Way. Botley, Southampton. Illustrative Masterplan.* Reference: CB_63_311_PARAM_001.
- Hawkins Environmental (November 2023). *Air Quality Assessment. Broad Oak, Botley.* Reference: H3802-AQ-v3.

Contaminated land

No report on contaminated land has been provided.

A review of available historical maps indicates the site has not been developed and it is not within an identified contaminative land use area. The land adjacent to the west boundary has been historically used as paddocks with associated infrastructure. A number of dwellings are located to the east of the site since around 1960s. The site bounds to the north with rear gardens of residential dwellings and A334 further north.

The bedrock geology of the site comprises sands, silts and clays from the Earnley Sand Formation, which is classed as Secondary A Aquifer. A ditch runs along the north, west and south boundaries and Pudbrook Lake is located approximately 100m from the east boundary. Made ground is anticipated to be limited in extent and could be associated with the historical uses of the land to the west and construction activities to the north and east.

The proposed development involves the creation of private gardens for each dwelling as well as a large proportion of land to be used as public open space, including a play area to the south.

We agree with the principle of the development; however, we recommend that standard contaminated land conditions are applied to address any potential land contamination issues from the historical activities of adjacent lands to the future site users. In addition, the provision of a CEMP to address how potentially adverse impacts to neighbouring dwellings and the environment will be prevented, minimised or mitigated any potential should be required for the proposed development. Please see suggested conditions below:

Contaminated land:

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

- a. A Report of Preliminary Investigation comprising a Desk Study, Conceptual Site Model, and Preliminary Risk Assessment documenting previous and existing land uses of the site and adjacent land in accordance with UK Land contamination risk management (LCRM) national guidance, and BS10175:2011 Investigation of potentially contaminated sites - Code of Practice, and, unless otherwise agreed with the LPA,
- b. A Report of a site investigation documenting the ground conditions of the site and incorporating chemical and gas analysis identified as appropriate by the Preliminary Investigation and in accordance with BS10175:2011, and BS 8576:2013, CL:aire RB17 and unless otherwise agreed with the LPA
- c. if required, 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.

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 construction;
- e) a scheme for controlling noise and vibration from 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 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.

Air Quality

Air Quality Assessment: Broad Oak, Botley The Trustees of The Mulberry Investment Pension Scheme development by Hawkings Environmental.

The proposed development is located in close proximity to Botley Air Quality Management Area (AQMA 4).

Overall, the proposed methodology appears to be comprehensive, however, we noted the assessment uses a comparison of PM_{2.5} concentrations against the “old” limit of 25µg/m³ instead of the revised limit of 20µg/m³

([Air Quality Objectives Update 20230403.pdf \(defra.gov.uk\)](#)). Though the predicted

levels of the pollutant would comply with it. There was not mentioning of the impact the development might have on the implementation of the AQAP.

Under the Transport Statement, which used TRICS assessment 148 AADT is estimated to be generated by the development with 83% of these trips traveling west on Broad Oak from the site and 17% traveling east – all of which will enter an Air Quality Management Area. This, in accordance with HCC Highways response, is less than 1% increase in traffic and will have a negligible impact on the operation and safety of the local road network.

The Air Quality assessment concluded that the contribution of the development is expected to be very small concerning the emissions generated by traffic. At the same time, the construction phase of the development was identified as a “High Risk” for the whole site requiring site-specific mitigation measures to be developed and proposed.

Considering the above I wish to make the following comments/observations:

We do not inherently oppose the development; however, we wish to emphasise the importance of ensuring that appropriate site-specific mitigation measures are implemented.

Therefore, we fully support the recommendations made in the Assessment and would advise the implementation of suggested mitigation measures (without listing them here). We also believe it is essential to incorporate a robust Dust Management Plan (DMP) as part of the planning conditions.

A well-structured Dust Management Plan will not only contribute to safeguarding air quality but also address potential concerns related to dust emissions during the construction phase. This proactive approach aligns with our commitment to maintaining high environmental standards within our community.

Therefore, we recommend the following conditions:

No development shall take place in a construction Phase of the development, until a detailed (Air Quality and) Dust Management Plan (AQDMP) for that Phase, detailing the management of construction dust, has been submitted to and approved in writing by the Local Planning Authority.

Noise

Noise comments will be provided separately.

Should you wish to discuss the matters raised here I shall of course be pleased to do so.

Yours Sincerely,

Yacklin Panza

Pollution Control Specialist