



Clare Martin
Development Management
Eastleigh Borough Council
Eastleigh House
Upper Market Street
Eastleigh
Hampshire
SO50 9YN

28th January 2025
By email only

Dear Clare,

Application No: O/24/98619

Site Address: Land South of Mortimers Lane, Fair Oak

Description: Outline application with all matters reserved for the construction of up to 245 dwellings and up to 350sqm multi-functional building

Thank you for consulting SUEZ on this development proposal.

SUEZ Recycling and Recovery UK own and manage the restored landfill site at Fair Oak which is located some 55m to the south of the application site. On the northern boundary of the SUEZ land is located an environmental management compound which houses the equipment necessary for management and control of the gas and liquid (termed leachate) produced by the waste as it degrades within the engineered landfill site. Management and control of these degradation products is of paramount importance to ensure appropriate protection of the environment and compliance with the site's environmental permit with the Environment Agency.

The submitted application documents acknowledge the presence of the closed but still licensed landfill site and its environmental management infrastructure. We are pleased to note that the contaminated land Desk Study and Ground Investigation reports include landfill gas risk assessments. We do have concerns regarding the scope and assumptions made in the noise and air quality assessments and these are explained further under the respective sub-headings below.

Landfill Gas Risk

Our principal concern relates to safety and the health of any users of the proposed development. SUEZ are still managing landfill gas at Fair Oak landfill site to a level which requires an active gas management system. This is expected to remain in place for many years to come and necessarily operates 24 hours, 7 days a week. Currently the quantity of landfill gas produced remains sufficient to support on-site generation of green electricity which feeds into the grid.

Landfill gas is an inevitable bi-product of non-inert landfilling and goes on for many years after the waste has been deposited as the waste breaks down and decomposes. SUEZ, as the environmental permit holder, actively manage this gas to ensure the risk to people and the environment is reduced as far as practicable. However, when development is carried out close to the boundaries of a landfill this might cause a change in the gas receptors, the pattern of migration of the landfill gas and ultimately result in an unwanted escape of gas.

SUEZ is of the view that whilst a fully engineered landfill is designed to completely contain gas and leachate it is prudent to take a more risk averse approach especially when human health is under consideration, and whilst robust gas management systems are in place, systems can fail. The submitted Ground Investigation Report does consider this scenario and concludes that no gas protection measures are required.

Noise impacts

The application includes a noise assessment which recognises the presence of the existing landfill gas electricity generation scheme at Fair Oak landfill and its operation 24/7. The assessment assumes that background monitoring undertaken included noise contribution from the engine units in operation, but no checks were made with SUEZ to confirm this.

Landfill gas management equipment requires changes over time to ensure it remains effective and the current planning permission includes a condition requiring each of the two engine units to be housed in an acoustic enclosure containing noise emissions to a level of 68dB(A) at 10 metres. SUEZ consider that the noise assessment should also model these conditioned levels, particularly during the sensitive night-time period, to ensure the requirements of the agent of change principles within the NPPF are met.

Air quality impacts

The air quality assessment appears only to consider traffic impacts and does not acknowledge emissions from the landfill gas management system, emissions from which are modelled and monitored under the environmental permitting regime. SUEZ would be happy to provide this data on request.

In summary, SUEZ wish to ensure that the Applicant and the Council implement the 'Agent of Change' principle to ensure that the developer is responsible for managing the impacts associated with developing a residential scheme close to an actively degrading landfill site and its necessary environmental management systems. We request that further information, as outlined above, is provided to demonstrate this.

We would also recommend that a mechanism is put in place to advise any potential purchasers of the dwellings of the proximity of the proposed development to the landfill site and ongoing environmental management operations.



If you have any questions about the information or issues raised in this letter please do not hesitate to contact me.

I look forward to hearing from you.

Yours sincerely

A handwritten signature in black ink that reads "A. Wilshaw".

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