To: Marie-Claire Tovey

From: Jack Dearman

Date: 17th June 2021

Your ref: EPF/1223/21

My ref:

Epping Forest District Council

Address: **Aver House, Nursery Road, Nazeing, Waltham Abbey**

Proposal: **Demolition of commercial building and replacement with single dwelling**

With reference to the above application:-

I note the desktop study report (Ref.YE2624.1) dated February 2019 has been resubmitted.

Contaminated Land commented on the EPF/1200/21 application for this site on 28th May 2021 and the EPF/2065/20 application for this site on 28th October 2020. Our comments for this application are unchanged and full contaminated land conditions are recommended to be attached to this application also. Comments for EPF/2065/20 are included below for reference.

NSCN57 should be attached to the application.

EPF/2065/20 Comments – 28th October 2020

I have screened readily available council electronic records and can see that the site is recorded on our database as ***Horticultural Nursery/Landfill.***

It has been noted that a phase 1 desk study has been submitted dated February 2019 in support of this application. The phase 1 desk study report was thoroughly reviewed under the EPF/0196/19 application:-

The desktop study report (Ref.YE2624.1), dated February 2019, relating to potential contamination issues at the above site has been reviewed, with reference made to the extended DTS report (ref.YE2624 v2), dated Sept 2016, and from this I have the following comments to make regarding content:

The report satisfactorily addresses requirements for submission of desktop study reports to EFDC. The preliminary risk assessment has identified potential contaminants of concern. In particular, the following historic land uses both on site and adjacent: -

On Site:	*Agricultural Buildings*	*Potential medium risk*
Off site:	*Landfill*	*Potential high risk*
	Printing Works	*Potential high risk*
	Works	*Potential high risk*

An intrusive site investigation is therefore required to be undertaken and which needs to assess all the potential contaminant linkages identified in the preliminary conceptual site model of the desktop study. The number of three trial pits and a further three shallower trial pits specifically for asbestos analyses, are considered satisfactory for the size of this part of the

overall development (EFDC/1956/17). Historic landfilling has been identified immediately adjacent the proposed development so analysing for phenol will be expected to be included within the contaminant suite of analyses. Should contamination above guideline values be discovered, further sampling would be expected to delineate the extent of contamination.

The report states that testing of all determinants will be undertaken by a laboratory with the required accreditation for each method. The report identifies ground gas as a potential risk to the development but falls short of including gas monitoring in the proposed scheme of works. However, this is discussed in the extended DTS covering the wider site. Here, only two months of monitoring including six visits is proposed. This is not in keeping with best practice as given in CIRIA C665. Given the surrounding landfilling area, and alluvium deposits ground gas monitoring will be expected on site and to conform to best practice for a site with a proposed sensitive development potentially impacting by at least moderate generation potential of source. While a moderate risk to controlled waters has been identified, there is no reference in the report to demonstrate how the proposed site investigation will address this risk. Groundwater sampling is referred to in the extended DTS. An asbestos survey has been completed for the wider area and ACMs identified in buildings planned for demolition. Evidence will be required to show that ACMs have been appropriately disposed from site and that any such residual contamination in soils following disposal has been addressed. Please Note: Sampling must target identified pathways as highlighted in the conceptual site model. Particular attention will be given to the number of samples analysed per individual contaminant pathway identified in the preliminary conceptual site model. Consequently, composite sampling is not considered suitable as part of the assessment of contaminant linkages.

Given the above concerns regarding risks from ground gas and risks to controlled waters, as well as ensuring sampling addresses contaminant linkages, I would strongly advise that to avoid potential requirements for further investigation, the contractor contacts the LPA to discuss the proposed overall sampling strategy for this and the wider development. Site investigations are to be in accordance with best practice as outlined in BS10175:2011. Gas monitoring is to be in accordance with best practice as outlined in such documents as BS8576:2013, BS 8485:2015, Claire RB17 and CIRIA C665.

As a proposed development sensitive to contamination and considering the above review of the DTS, the following conditions are recommended to be attached to the Decision Notice

SCN57 – Contaminated Land
SCN58 - Contaminated Land - Approval of Verification Report
SCN59 - Contaminated Land - Not Previously Identified

To help ensure developers submit information to the standard expected by this Authority, the Essex Contaminated Land Consortium has put together a leaflet entitled "Land Affected by Contamination: Technical Guidance for Applicants & Developers", available as a download Online.

At the back of this document is a template for a Completion Certificate which can be used to document site investigation work undertaken on site. A certificate of this nature is required to be submitted to the LPA before discharge of the final contaminated land condition.