

To: Graham Courtney

From: Jack Dearman

Date: 24th July 2019

Your ref: EPF/1111/19

File ref:



Address: Wyldingtree, 66 The Plain, Epping, CM16 6TW

Proposal: Demolition of existing bungalow and construction of 2x pairs of semi-detached houses with associated parking & gardens

Updated memo

The desktop study (ref. 2263/Rpt 1v1), dated March 2019, relating to potential contamination issues at the above site has been reviewed and I have the following comments to make regarding its content:

The report satisfactorily addresses the requirements for submission of a desktop study, in that it is signed, countersigned and dated, contains: relevant information following a site walkover; background information for the site and surrounding area; a written conceptual site model (CSM) and preliminary risk assessment; conclusions and recommendations.

The site walkover revealed no major sources of contamination impacting soils on-site, and no visual/olfactory evidence of contamination was noted. According to council records, the site lies directly adjacent to a former hospital and former brickworks and timber yard. However, the report shows following scrutiny of historic maps, that the actual historic works are ~250m from the site boundary - this distance effectively negating any potential contaminant linkage. The former hospital, considered a low risk site, has recently been developed. Given these considerations it is not considered an active source of contamination impacting the site. It is presumed the building planned for demolition predates 2000 and contains asbestos containing materials (ACMs), it is therefore essential that any ACM identified in an asbestos survey are appropriately managed, removed and disposed offsite by specialist contractors in accordance with good practise and current guidance. Further, it is the responsibility of the developer to ensure measures are put in place to prevent contamination of the soils during such works. As such, evidence may be required to show that ACMs, identified following the required asbestos survey, have been appropriately disposed from site. Given the underlying London Clay geology, the minor aquifer status of groundwater and the absence of suspected soil contamination on site or adjacent, risk from ground gas and to the groundwater receptor were considered unlikely.

Following review of the report I can concur with the concluding comments that no further site investigations are required. However, given the sensitivity of the development and the possibility of ACMs in the building planned for demolition the following condition and informative are recommended should the LPA be mindful to grant permission:-

SCN59 - Contaminated Land - Not Previously Identified

Informative

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Given the proposal for demolition, it has been assumed the build date of the building planned for demolition predates the year 2000 and therefore contains asbestos containing materials (ACM). It is therefore recommended that an Asbestos Survey is undertaken prior to demolition. Without such a survey and the subsequent safe removal of ACMs disposed of to an appropriate waste management facility, it may be assumed that demolition will result in soil contamination of the site. Where asbestos contamination is suspected the LPA may request the survey and waste transfer notes to help with the discharge of any contaminated land conditions applied to a Decision Notice. To help with managing asbestos on site the Health Safety Executive have published a checklist, available for download from the following website:

<http://www.hse.gov.uk/asbestos/assets/docs/checklist.pdf>

Original memo

I have screened readily available records held by the Council for this site including our GIS database and aerial photographs. These records have not identified any acknowledged sources of potential contamination.

The proposed residential land use is classed as a high risk and sensitive land use. Therefore, in question 6 of the application form '*A proposed use that would be particularly vulnerable to the presence of contamination*' which was answered 'no' should have been answered 'yes'.

It has been noted that a phase 1 geo-environmental assessment has been submitted by Brown 2 Green Geotechnical and Geo- Environmental Consultants in support of this application. This will be sent for review by consultants acting on the Councils behalf and all feedback will be passed to the planning officer/developer.

Due to the sensitive nature of the proposed residential use, I recommend that the land contamination conditions **SCN57, SCN58, SCN59** be attached to any approval granted. Once the contaminated land assessment documents have been reviewed the attached conditions may be considered for discharge.

Reason

To ensure the risks from land contamination to the future users of the land and neighbouring land are minimised, together with those to controlled waters, property and ecological systems, and to ensure that the development can be carried out safely without unacceptable risks to workers, neighbours and other offsite receptors, in accordance with the guidance contained within the National Planning Policy Framework, policy RP4 of the adopted Local Plan and Alterations, and policy DM 21 of the Epping Forest District Council Local Plan Submission Version 2017.

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