

To: Francis Saayeng  
From: Jack Dearman  
Date: 5<sup>th</sup> August 2019  
Your ref: EPF/0921/19 & EPF/0922/19  
File ref:



**Address:** 1-7 Margaret Road, Epping, CM16 5BP & Land adjacent to 7 Margaret Road, Epping, Essex, CM16 5BP

**Proposal:** Proposed x2 no. new dwellings to land rear of 1-7 Margaret Road & Proposed new dwelling to land adjacent to no.7 Margaret Road

Updated memo

The desktop study report (ref. CON138-EPPI-001), dated 24th May 2019, relating to potential contamination issues at the above site has been reviewed by the council's external consultant, and the following comments have been made regarding content:

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

The preliminary risk assessment has identified potential contaminants of concern. In particular, the following historic land uses both on site and adjacent:-

Off site:	Former Brewery	Potential Medium Risk
	Car Repairs	Potential Medium Risk
	Unspecified Works	Potential High Risk

The report further records ground gas as a potential risk to the development from infilled ponds. No landfills were identified within 250m of the site boundary. Given the clay geology risks to groundwater were considered insignificant. However, where groundwater strikes occur, samples will be taken. The nearest surface water feature, the Cobbins Brook, is located approximately 340 metres to the south west, and therefore considered too far to be impacted by any contamination on site. An intrusive site investigation is therefore required to be undertaken and needs to assess all the potential contaminant linkages identified in the preliminary CSM. Should contamination above guideline values be discovered, further sampling would be expected to delineate the extent of contamination. Appendix F of the report outlines the proposals for the site investigation, including gas monitoring of 6 visits over 3-6 months in accordance with best practice set outline CIRIA C665. While the proposal stipulates soil sampling with an acceptable suite of contaminants, it states one sample from each sampling point may be taken. This is considered insufficient. Further information regards the sampling strategy is required to inform the LPA on the intended number of samples and from what depths so that potential contaminant linkages are satisfactorily addressed. With no buildings on site, there is no risk from ACMs impacting soils from demolition works.

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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 report has highlighted potential risks from soil contamination and ground gas, I would strongly advise that to avoid potential requirements for further investigation, the contractor contacts the Council to discuss in more detail the proposed sampling strategy.

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 remain on 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 to 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.

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### *Original memo*

*I have screened readily available records held by the Council for the contiguous site area outlined in the two applications above including our GIS database and aerial photographs. These records have identified that the site has no acknowledged potentially contaminated land but that there are Works with the potentially contaminated land immediately north east of the site.*

*As the proposal encompasses residential dwellings with gardens, a contaminated land assessment is required as this constitutes a sensitive land use. It has been acknowledged that the same phase 1 preliminary risk assessment has been submitted for both applications in support of this application. This will be sent for review by consultants acting on the Council's 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 for both the EPF/0921/19 & EPF/0922/19 applications. Once the phase 1 preliminary risk assessment has been reviewed the attached conditions may be considered for discharge.*

### **Reason**

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*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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