



# Elmbridge Borough Council

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Date: 13 December 2023

## Memorandum

<b>To:</b> Head of Planning Services FAO: Margarita Romanovich	<b>From:</b> Environmental Services Contact: Helen Ballard
<b>cc:</b>	<b>Our ref:</b> WK/202307138 <b>Telephone:</b> [REDACTED]

<b>Planning Application Number:</b> 2023/2889	<b>Address:</b> Land Off Anyards Road and Copse Road Cobham Surrey KT11 2LH
<b>Application Description:</b> Outline Application for 26 residential dwellings following demolition of existing buildings (For layout, scale, access, and appearance).	

Thank you for the consultation that was received by this team on 11/12/2023.

The following report has been provided in support of this application:

Main Investigation Report, Soils Limited, ref 20737/MIR, June 2023

### Comments

Please provide the Preliminary Investigation Report (Soils Limited, 20737/PIR, March 2023) referred to in the Main Investigation Report.

Appendix B.1 Engineering Logs provided were incomplete, please provide a complete set, including screened interval for monitoring wells installed in WS1, WS4 and WS6.

It is recommended that as part of the Discovery Strategy, a watching brief be maintained during all ground works.

Findings of the Main Investigation Report included:

*The Tier 1 Quantitative risk assessment has established that there was a potential risk to human health receptors from Lead and PAH's, which could require agreement of a remediation strategy or additional investigation and analysis.*

*There was asbestos associated with the structures onsite (domestic garages). Asbestos risk assessment / removal must be undertaken by professional competent person in agreement with regulators.*

*The Groundwater Risk Assessment has established the groundwater underlying the site has been impacted by lead from likely onsite source and further groundwater assessment was required to establish whether remediation is necessary.*

*The ground gas risk assessment established that ground gas was unlikely to be an issue to the site and the no ground gas protection was considered necessary.*

*The BGS Radon interactive Atlas accessed in March 2023 indicated that the site is not located in a radon affected area. No Radon protection measures would be anticipated in new developments or extensions.*

With respect to the potential for the land to be affected by ground contamination, the following is recommended:

#### Condition

##### **Potential Land Contamination**

To ensure the potential for contamination has been investigated and the necessary action taken to make the development site suitable for its proposed use, the following steps must be completed to the satisfaction of the Council. No demolition or construction shall be commenced until step (a) has been completed by a competent person and approved. If part (a) identifies the need for step (b) then this shall also be completed and approved before any demolition or construction commences. Furthermore, there shall be no occupation of any part of the site by any end user prior to meeting the terms of this condition in full.

##### **a) Preliminary Investigation of the Site**

A preliminary investigation shall be carried out by a competent person prior to any site clearance or demolition, to assess the condition of the land to be re-developed, in respect of contamination. The preliminary investigation must, as a minimum, include a complete site history, site walkover, desk-based evaluation and Conceptual Site Model and may include intrusive investigation. A written report of the investigation shall be submitted to the Council for written approval.

If the Council are satisfied that there is a significant possibility that the site could pose a significant risk to future occupiers under its proposed redevelopment use as a result of contamination, then the following additional steps shall also be carried out.

##### **b) Site Investigation, Method Statement and Remediation**

(i) A written site-specific investigation plan using the information obtained from the preliminary investigation, providing details of the investigation for soil, gas and controlled waters where appropriate, shall be submitted to, and approved by, the Council.

- (ii) The site investigation shall be undertaken in accordance with the scheme agreed by the Borough Council. The results of the site investigation, a refined conceptual model and a risk assessment of any contamination found shall be submitted in writing to, and approved by, the Council.
- (iii) A written Method Statement with verification plan, detailing any remediation requirements and how successful implementation of these requirements will be verified shall be submitted to, and approved by, the Council.

**c) Development in accordance with the Method Statement**

The development of the site shall be carried out in accordance with the approved Method Statement, and any addenda submitted by the developer, and agreed in writing by the Borough Council. Any post remediation monitoring identified in the Method statement, shall be installed by the developer within the timescales identified in the Method Statement and maintained and operated for as long as identified by the Method Statement.

**d) Unsuspected Contamination**

If, during development, contamination not previously identified, is found to be present at the site then no further development shall be carried out until the developer has submitted, and had approved by the Council, a written addendum to the Method Statement detailing how the unsuspected contamination shall be dealt with.

**e) Piling**

Development approved by this permission shall not commence unless a Foundation Works Risk Assessment for piling foundations (if piling is to be used on site) has been submitted to, and agreed in writing, by the Borough Council. The piling shall be undertaken only in accordance with the method outlined in the approved Foundation Works Risk Assessment.

**f) Imported material**

Clean, uncontaminated rock, soil, brick rubble, crushed concrete or ceramic only shall be permitted as infill material. The developer shall not import any material until a sampling program, including appropriate import criteria for the proposed end use and frequency of sampling, has been submitted in writing, and approved by, the Council. The Developer shall carry out the approved sampling program to check that all imported material conforms to the agreed criteria. Where the permitted end use is residential, the sampling program shall also include samples taken from the imported material after final placement. Written confirmation of the suitability of all imported materials shall be provided to the Council as part of step (g). This shall include both the results of the sampling program and also details of the origin, transport, final deposition and any temporary stockpiling of the imported materials.

**g) Completion of Remediation and Verification Report**

*Verification by an independent, competent person must be carried out prior to occupation of any part of the site by any end user.*

Upon completion of the remediation detailed in the Method Statement, and before occupation of any part of the site by any end user, a written Verification Report shall be submitted to, and agreed in writing by, the Council providing verification that the

required works regarding decontamination and installation of post remediation monitoring, have been carried out in accordance with the agreed Method Statement and any addenda thereto. The verification report shall also provide confirmation, with appropriate evidence where applicable, that all remaining terms of the condition have been met. Verification shall be carried out and reported by an independent, competent person, stating that remediation was carried out in accordance with the approved remediation scheme and that the site is suitable for the permitted end use.

**Reason:** To avoid adverse effects from pollution on the environment, harm to human health or general amenity, in accordance with the National Planning Policy Framework.

#### Informative

##### ***Advice to Developers Regarding Contamination Assessments***

Before carrying out any contamination investigation or remediation of a site, the developer is strongly recommended to contact the Planning & Environmental Health Team for guidance on the requirements for such investigations or remediation. Investigations, in particular, which do not adequately fulfil these recommendations, may result in additional work having to be carried out.

#### Informative

##### ***Asbestos Containing Materials (ACMs)***

Please be aware that buildings constructed before 2000 may contain asbestos and a suitable asbestos survey should be undertaken before any redevelopment commences. If materials containing asbestos are present on the site, a written Plan for removal of the ACMs from the building prior to demolition is required by the Health and Safety Executive. A specialist contractor must remove such materials to a licensed facility before demolition and site clearance works commences. This is to ensure that the material is not broken up and left on site and does not pose a health risk to site workers or neighbouring residents. The enforcing authority with regard to asbestos on demolition and construction sites is the Health and Safety Executive and advice is available at <http://www.hse.gov.uk/asbestos/>

#### Informative

##### ***Ground Conditions and Underground Services***

As a previously developed site, ground conditions may be potentially detrimental to some underground services, including the potable water supply. The developer should consider the suitability of the ground conditions for the installation of underground services in accordance with the current guidance and in discussions with the utility supplier. If necessary, in the case of the potable water supply, precautionary protective measures might include appropriate installation of suitable barrier pipes.



Helen Ballard

Contaminated Land Officer  
Environmental Services