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COMMENTS ON PLANNING APPLICATION

Reference: 21/0573/FUL Our Ref: 21/01358/GPAENQ	Date: 09/04/2021
Address: Development Site, Maple Lodge, Maple Lodge Close, Maple Cross, Hertfordshire	From: Ben Firmin – Community and Environmental Services To: Claire Westwood – Regulatory Services

Re. Comprehensive redevelopment to provide 2 no. warehouse Class E(giii)/B2/B8 units comprising a total of 16,115 sqm including 1,882 sqm ancillary E(gi) office space, access, landscaping and associated works.

Air quality

I have reviewed the Air Quality Assessment prepared by BWB Consulting Ltd (Report ref. LNT2082-001).

A qualitative construction phase dust assessment has been undertaken in accordance with the IAQM Guidance on the assessment of dust from demolition and construction. Measures have been recommended for inclusion in a Dust Management Plan to minimise emissions during the construction phase. With the implementation of these mitigation measures the residual impacts of construction phase are considered to be 'not significant'.

The trip generation for the proposed development was screened in accordance with the two stage screening process described in the EPUK & IAQM Land-use Planning & Development Control: Planning for Air Quality guidance. The trip generation for the proposed development is predicted to be 901 trips as a 24 hour Annual Average Daily Traffic (AADT) flow, 129 of which would be HDVs. The proposed development trip generation exceeds the criteria set out in the EPUK & IAQM guidance, however, the greatest increase in traffic on roads where existing sensitive receptors are present (on the A412 Denham Way south of the site access road) is 173 trips, of which 25 are HDVs.



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This increase is below the stage 2 criteria set out in the guidance (a change of LDV flows of more than 500 AADT outside an AQMA and a change of HDV flows of more than 100 AADT outside an AQMA). The impact on local air quality is considered to be insignificant. A detailed air quality assessment including dispersion modelling is not required.

I would recommend that a condition requiring a dust management plan be applied to any permission granted. The dust management plan should include the recommended mitigation measures as detailed in Table 4.4 and Table 4.5 of the Air Quality Assessment.

I would suggest informatives relating to the following:

The use of vehicles that meet the most recent European emissions standards;
Following relevant guidance such as the IAQM guidance.

Land contamination

I have reviewed the following documents:

Site Investigation and Geo-Environmental Assessment Report prepared by ESI Environmental Specialists (Report Ref. 62409D1), June 2014;

Supplementary Site Investigation – Maple Cross, Rickmansworth prepared by Tier Environmental Ltd (Report ref. TL1177SSI1.3), 9th February 2021;

Method Statement for Monitoring Well Decommissioning prepared by Tier Environmental Ltd (Report ref. TL1177MWDECOM.MS1.2), 23rd February 2021;

Maple Cross Contaminated Land Assessment and DQRA – Summary report prepared by H Fraser Consulting Ltd (Report ref. 30422R1), 2nd March 2021;

Piling Method Statement and Risk Assessment for Maple Cross, Hertfordshire prepared by Tier Environmental Ltd (Report ref. TL1177PMSRA1.2), 2nd March 2021.

The intrusive investigations have not identified any elevated concentrations of contaminants of concern in exceedance of the relevant generic assessment criteria. The investigations have identified the existence of a complete contaminant linkage with regards to asbestos fibres and fragments in the underlying soils. It is considered that the site presents a potentially unacceptable risk from asbestos to human health for a commercial/industrial land use.

Outline remedial measures have been discussed in the report. These include the following:

- Preparation of a Remediation Strategy;

- Removal and verification of areas containing heavily impacted asbestos soils for disposal as hazardous waste, verification of excavations to validate complete removal;
- Removal and segregation of areas containing impacted asbestos soils through hand-picking of visibly identifiable ACM fragments for disposal as both non-hazardous (bulk soils) and hazardous waste (reduced asbestos volume). Verification sampling of excavations to validate complete removal*;
- Removal and verification of any previously unidentified areas of contamination, where required:
 - Backfill of resultant excavations with suitable material;
 - Laboratory chemical testing and risk assessment of imported materials required for the for the clean cover system;
 - Installation of a 300mm clean cover system at the site in the soft landscaping areas.

**I have been advised by the environmental consultants that the developer has chosen to undertake these works voluntarily.*

Further details were provided in a previously submitted technical note. The physical barriers provided by the hardstanding of the development and the clean cover system are considered suitable measures to break the pathway between any remaining sources of contamination and sensitive receptors.

Based on this, the following contaminated land condition is recommended on this **and any subsequent applications** for the site.

1. Prior to the commencement of development approved by this planning permission (or such other date or stage in development as may be agreed in writing with the Local Planning Authority), the following components of a scheme to deal with the risks associated with contamination of the site shall each be submitted to and approved, in writing, by the local planning authority:

i) An options appraisal and remediation strategy, based on the Supplementary Site Investigation – Maple Cross, Rickmansworth prepared by Tier Environmental Ltd (Report ref. TL1177SSI.1.3), with particular reference to the outline measures detailed in Section 11.9 of the report and Appendix R – Technical Note Asbestos At Maple Cross, giving full details of the remediation measures required and how they are to be undertaken.

ii) A verification plan providing details of the data that will be collected in order to demonstrate that the works set out in (i) are complete and identifying any requirements for longer term monitoring of pollutant linkages, maintenance and arrangements for contingency action. Any changes to these components require the express consent of the local planning authority. The scheme shall be implemented as approved.

Reason: To ensure that 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.

2. Following completion of measures identified in the approved remediation scheme and prior to the first use or occupation of the development, a verification report that demonstrates the effectiveness of the remediation carried out must be produced together with any necessary monitoring and maintenance programme and copies of any waste transfer notes relating to exported and imported soils shall be submitted to the Local Planning Authority for approval. The approved monitoring and maintenance programme shall be implemented.

Reason: To ensure that 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.

The above must be undertaken in accordance with the Environment Agency's 'Land contamination risk management (LCRM)' guidance, available online at <https://www.gov.uk/government/publications/land-contamination-risk-management-lcrm>.

3. Reporting of Unexpected Contamination: In the event that contamination is found at any time when carrying out the approved development that was not previously identified it must be reported in writing immediately to the Local Planning Authority. An investigation and risk assessment must be undertaken, and where remediation is necessary a remediation scheme must be prepared, which is subject to the approval in writing of the Local Planning Authority. Following completion of measures identified in the approved remediation scheme a verification report must be prepared, which is subject to the approval in writing of the Local Planning Authority.

Reason: To ensure that 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.

INFORMATIVES:

Information for Developers and guidance documents can be found online at https://www.watford.gov.uk/info/20011/business_and_licensing/349/contaminated_land

Ben Firmin
Environmental Protection Officer

"The information supplied may have been provided to the Council by third party sources, or may have been compiled from or may summarise information from such sources. It is therefore supplied on the basis that the Council does not warrant or represent the accuracy of the information or answers provided. While the information or answers are provided in good faith, they are provided on the strict understanding that neither the Council, nor any officer, servant or agent of the Council, is legally responsible in contract or in tort, for any inaccuracies, errors or omissions arising from any cause whatsoever. In particular, it must be understood that the question of whether land is or is not "contaminated land" within the meaning of Part IIA of the Environmental Protection Act 1990 is a complex question requiring formal determination by the Council. Accordingly, the information or answers provided do not constitute any determination by the Council as to the status of the land concerned, nor any assurance or representation as to the possible or likely outcome of any such determination."