

RESPONSE FORM – ENVIRONMENT TEAM

Planning and Regulatory Services,
St Edmundsbury Borough Council,
West Suffolk House,
Western Way,
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Suffolk, IP33 3YU

Case Officer: Chris Rand
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Application No: DC/15/2151/OUT

Consultation Period Expires: 21st January 2016

Environment Team (Name):

**Matthew Axton
Environment Officer**

Environment Team Reference No.:

WK/201527442

CONSULTATION ON APPLICATION RECEIVED BY LOCAL PLANNING AUTHORITY

PROPOSAL **Outline Application (Means of Access to be considered) - Residential development of up to 2,500 units (within use classes C2/C3); two primary schools; two local centres including retail, community and employment uses (with use classes A1/A2/A3/A4/A5, B1 and D1/D2; open space; landscaping and associated infrastructure**

LOCATION **Great Wilsey Park, Wilsey Road, Little Wratting**

APPLICANT **Hallam Land Management Limited**

AGENT **Bidwells LLP**

Section(s) Responding(Please tick):

Contaminated Land <input checked="" type="checkbox"/>	Local Air Quality <input checked="" type="checkbox"/>	Private Water Supplies <input type="checkbox"/>
Sustainable Development <input type="checkbox"/>	Environmental Permitting Issues <input type="checkbox"/>	Commercial & Food: <input type="checkbox"/>

DO THE ENVIRONMENT TEAM OBJECT TO THIS APPLICATION: **NO**

Comments to explain why ET object/support the application:

Land Contamination:

This Service has reviewed a copy of the *Geo-Environmental Phase 1 Desk Study* undertaken by Brookbanks Consulting Ltd, reference 10173, Revision 1 dated February 2016. This desk study concludes that the risk from land contamination is low and we generally agree with this conclusion, however, this Service consider that there are a small number of localised potential contamination sources and therefore recommends the below standard condition is attached to any planning approval that may be granted.

Air Quality:

Chapter 12 of the Environmental Statement deals with Local Air Quality. The chapter models the air quality in terms of Nitrogen Dioxide, PM_{2.5} and PM₁₀ at a number of receptors. The modelling predicts that only one of the receptors will suffer a minor adverse impact, whilst the impact at all other modelled receptor locations will be negligible. This is

broadly acceptable; however, the following should be noted:

- The modelling relies on the North West Haverhill Relief Road (as approved under planning reference SE/09/1283) being in place. If this relief road is not in place, the proposed Great Wilsey Park development could adversely affect the traffic levels, and therefore pollution levels, on Withersfield Road. Monitored levels of Nitrogen Dioxide along Withersfield Road are currently close to the annual mean Air Quality Objective and therefore a significant increase in traffic levels along this road is unlikely to be acceptable. A temporary increase in traffic along Withersfield Road is already predicted as the North West Haverhill Relief Road does not need to be completed and made available for use until 5 years from commencement of the North West Haverhill residential development (also approved under planning reference SE/09/1283).

If construction of the Great Wilsey Park development commences prior to the completion and making available of the North West Haverhill Relief Road, sufficient evidence will have to be submitted to confirm that the increase in traffic levels will not temporarily cause a breach of the annual mean objective for Nitrogen Dioxide.

- The air quality chapter of the Environmental Statement also relies on the emission factor toolkit released by DEFRA in July 2014 to predict future traffic related emissions. Future traffic emissions are predicted by DEFRA to become significantly less polluting due to improved engine performance and a significant uptake of electric vehicles. To assist in the uptake of electric vehicles as predicted, a reliable domestic and public charging network needs to be installed.

Paragraph 35 of the NPPF states that '*Plans should protect and exploit opportunities for the use of sustainable transport modes for the movement of goods or people. Therefore, developments should be located and designed where practical to ... incorporate facilities for charging plug-in and other ultra-low emission vehicles*'.

Policy DM2 (k) of the Joint Development Management Policies Document also requires proposals for all developments to produce designs that encourage the use of sustainable transport and Policy CS2 (E) of the Core Strategy requires the conserving and, wherever possible, enhancing of other natural resources including, air quality.

We therefore recommend that the below conditions are attached to any planning approval granted requiring the provision of electric car charge points at both a domestic and public level within the development.

Suggested conditions or amendments:

Contaminated land

We recommend the following three conditions in relation to contaminated land.

1. No development approved by this planning permission shall commence until the following components 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) A site investigation scheme (based on the approved Preliminary Risk Assessment (PRA) within the approved Desk Study), to provide information for a detailed assessment of the risk to all receptors that may be affected, including those off site.
 - ii) The results of a site investigation based on i) and a detailed risk assessment, including a revised Conceptual Site Model (CSM).
 - iii) Based on the risk assessment in ii), an options appraisal and remediation strategy giving full details of the remediation measures required and how they are to be undertaken. The strategy shall include a plan providing details of how the remediation works shall be judged to be complete and arrangements for

contingency actions. The plan shall also detail a long term monitoring and maintenance plan as necessary.

2. No occupation of any part of the permitted development shall take place until a verification report demonstrating completion of works set out in the remediation strategy in iii) is submitted to and approved in writing by the Local Planning Authority. The long term monitoring and maintenance plan in iii) shall be updated and be implemented as approved.
3. If, during development, contamination not previously identified is found to be present at the site then no further development (unless otherwise agreed in writing with the local planning authority) shall be carried out until the developer has submitted a remediation strategy to the local planning authority detailing how this unsuspected contamination shall be dealt with and obtained written approval from the local planning authority. The remediation strategy shall be implemented as approved.

Reason

To protect and prevent the pollution of controlled waters, future end users of the land, neighbouring land, property and ecological systems from potential pollutants associated with current and previous land uses in line with National Planning Policy Framework (NPPF), paragraphs 109, 120, 121, Environment Agency Groundwater Protection: Principles and Practice (GP3), Policy CS2 (Sustainable Development) of the Core Strategy and Policy DM14 of the Joint Development Management Policy. This condition requires matters to be agreed prior to commencement since it relates to consideration of below ground matters that require resolution prior to further development taking place, to ensure any contaminated material is satisfactorily dealt with.

Air Quality

We recommend the following conditions in relation to air quality:

4. No development approved by this planning permission shall commence until the North West Haverhill Relief Road, and all associated works, is completed and made available for use, unless a detailed air quality assessment has been provided and approved, in writing, by the Local Planning Authority that demonstrates any cumulative increase in traffic associated with the operational use of the proposed development (or specified phase thereof) and other committed major developments, will not cause a moderate or substantial negative impact (as defined in the IAQM, *Land-Use Planning and Development Control: Planning for Air Quality*, May 2015(v1.1)) on Nitrogen Dioxide levels at agreed relevant receptor locations along Withersfield Road and at the Cangle Junction.

Reason

To protect, and prevent the pollution of, air quality from potential pollutants associated with potential increased traffic associated with the development, in line with National Planning Policy Framework (NPPF), paragraphs 109 and 124, Policy CS2 (Sustainable Development) of the Core Strategy and Policy DM14 of the Joint Development Management Policy.

5. All dwellings with dedicated off street parking shall be provided with an electric vehicle charge point prior to first occupation. At least 50% of spaces for dwellings with non-allocated off street parking shall be provided with an electric vehicle charge point. Any private parking provided for business in the local centre or for the school shall be provided with electric vehicle charge points at a rate to be agreed as part of the reserved matters applications.
6. At least two public electric vehicle rapid charge points should be provided in each of the Local Centres within six months of the first occupation of any of the commercial units within the local centre. Arrangements for the management of these charge points, to the satisfaction of the Local Planning Authority, shall be in place at the commencement of operational use.

Reason

To promote and facilitate the uptake of electric vehicles on the site in line with the National Planning Policy Framework (NPPF) paragraph 35.

Observations on non planning issues:

DATE: 29th March 2016