

**Kerri Cooper**  
Planning & Regulatory Services  
West Suffolk Council  
West Suffolk House  
Western Way  
Bury St. Edmunds  
IP33 3YU

**Our ref:** AC/2020/129120/02-L01  
**Your ref:** DC/20/0094/RM  
**Date:** 15 April 2020

Dear Ms Cooper

**RESERVED MATTERS APPLICATION - SUBMISSION OF DETAILS UNDER  
OUTLINE PLANNING PERMISSION DC/15/2424/OUT - MATTERS RESERVED BY  
CONDITION 2 (APPEARANCE, LANDSCAPING, LAYOUT AND SCALE) FOR THE  
DEVELOPMENT OF UNITS 1 AND 2 FOR CLASS B2 AND B8 USE APPLICATION  
TO DISCHARGE CONDITION 6 (SURFACE WATER DRAINAGE) , 7 (HGV TRAFFIC  
MOVEMENTS AND DELIVERIES MANAGEMENT PLAN), 8 (LOADING  
MANOEUVRING PARKING), 10 (SOFT LANDSCAPING), 13 (LANDSCAPE  
MANAGEMENT PLAN), 17 (CONTAMINATION)AND 21 (SUDS) OF DC/15/2424/OUT  
LAND ADJ HAVERHILL BUSINESS PARK BUMPSTEAD ROAD HAVERHILL  
SUFFOLK**

Thank you for consulting us again.

We have reviewed the Nolan Associates letter of 4 March 2020 (ref: ARW/EJS/2018-294) and the detail provided is insufficient to alter our position set out in our letter of 19 February 2020 (ref: AC/2020/129120/01-L01).

The letter notes that this application includes Unit 1, which contains the easternmost boundary of the whole site which includes the infilled former railway land. The report also mentions the Delta Simons report, which we previously reviewed in our review in 2015 (our letter reference AC/2015/123831 dated 22 December 2015). For ease of reference, we have copied those comments below which have yet to be addressed:

*“The information provided indicates that the site has had no previous potentially contaminative land uses. However, an old landfill site encroaches into the eastern boundary of the site associated with the old railway line and the conceptual model identifies a source of contamination associated with the adjacent industrial estate. This area has reportedly been investigated through intrusive investigation and no contamination was identified (data not provided).”*

*These areas should be considered in more detail. We recommend a phased approach is taken to investigation at the site. Initially soil samples should be taken to determine whether contamination is present and if so, whether it is likely to pose a risk to groundwater and surface water before the investigation is extended further.”*

Cont/d..

The Nolan Associates letter does mention the railway line but only the fact that the levels are lower. We still need more detail on the results from the testing and associated groundwater risk assessment before we can progress any further. It should be noted that the area demarked to have infilled land extends on site. This letter does not comprise a groundwater risk assessment in line with [Land Contamination: Risk Management](#) that we requested in our February 2020 letter.

We also note that the detail given in the letter with respect to vibro stone columns is insufficient and in itself does not form a foundation works risk assessment. Please refer to our '[Piling and Penetrative Ground Improvement Methods on Land Affected by Contamination](#)' National Groundwater & Contaminated Land Centre Project NC/99/73.

The selected method, including environmental mitigation measures, should be presented in a 'Foundation Works Risk Assessment Report', guidance on producing this can be found in Table 3 of '[Piling Into Contaminated Sites](#)'.

We look forward to receiving a full groundwater risk assessment and foundation works risk assessment to address our previous request.

We hope that this information is of assistance to you. If you have any further queries please do not hesitate to contact us.

Yours sincerely

**Elizabeth Mugova**  
**Sustainable Places Planning Advisor**  
**East Anglia Area**

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**Does Your Proposal Have Environmental Issues or Opportunities? Speak To Us Early!**

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**Please note** – Our hourly pre-application charge is £100 per hour.

Environment Agency, East Anglia Area (West), Bromholme Lane, Brampton, Huntingdon, Cambs. PE28 4NE.  
[www.gov.uk/environment-agency](http://www.gov.uk/environment-agency)