

Hampshire County Council
The Castle
Winchester
Hampshire
SO23 8UE

Our ref: HA/2022/123908/01-L01

Your ref: HCC/2021/0787

Date: 24 February 2022

Dear Sir/Madam

PROPOSED EXTRACTION OF SAND AND GRAVEL, WITH RESTORATION TO GRAZING LAND AND RECREATION USING IMPORTED INERT RESTORATION MATERIALS, THE ERECTION OF ASSOCIATED PLANT AND INFRASTRUCTURE AND THE CREATION OF A NEW FOOTPATH AND ACCESS ONTO HAMBLE LANE

HAMBLE AIRFIELD

Thank you for the consultation on the above application, please quote our reference on all correspondence.

This site overlies River terrace deposits (classed as secondary aquifer. Historic activities on this site, namely the use as a former airfield may have resulted in contamination.

Environment Agency Position

We have reviewed the submitted desk top study/Site walk over assessment - Ground Condition Consultants Ltd, Hamble Airfield, April 2018, J18-010-R01 and have no objection to the proposal following the inclusion of the below conditions on any permission granted.

Whilst we would agree that the absence of mapped historic structure associated with the airfield, on the application site does appear to have reduced of significant contamination source of contamination being present, it is clearly not possible to rule out unmapped structures. This could be due to them being present between mapping releases, not mapped for security reason or only having small surface footprint.

Contamination has been described in a number of historic boreholes, but there is very limited investigation on the extent and nature of this contamination. We note that it is proposed that a discovery strategy during site operations will be relied upon to manage

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contamination risk. We disagree that this is sufficient to manage the risk, and there is a risk of contamination being mobilised, and impacting on wider controlled water receptors. As such intrusive work should be undertaken to assess the extent and nature of the contamination noted as being present. If required, this can be utilised to help form a risk management strategy, that can be incorporated into site working strategy.

Dependent on the time frame that the site was used as an operation airfield, fire fighting foams containing PFAS(s) may have been used or stored on site. The potential for PFAS contamination would need to be assessed in any investigation. This has not been assessed in the submitted investigation. As such further work/investigations will need to be undertaken to assess the contamination risks associated with this development.

These issues would be of particular concern if there were any dewater area of the site during site operation, as this may mobilise any contamination. Due to the nature of the contamination, there is likely to be severe limitation, on any proposed activities relating to PFAS impacted groundwater.

No development approved by this planning permission shall commence until a remediation strategy to deal with the risks associated with contamination of the site in respect of the development hereby permitted, has been submitted to, and approved in writing by, the local planning authority. This strategy will include the following components:

- 1. A preliminary risk assessment which has identified:**
 - all previous uses
 - potential contaminants associated with those uses
 - a conceptual model of the site indicating sources, pathways and receptors
 - potentially unacceptable risks arising from contamination at the site
- 1. A site investigation scheme, based on (1) to provide information for a detailed assessment of the risk to all receptors that may be affected, including those off-site.**
- 2. The results of the site investigation and the detailed risk assessment referred to in (2) and, based on these, an options appraisal and remediation strategy giving full details of the remediation measures required and how they are to be undertaken.**
- 3. A verification plan providing details of the data that will be collected in order to demonstrate that the works set out in the remediation strategy in (3) 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 written consent of the local planning authority. The scheme shall be implemented as approved.

Reason(s)

Previous activities may have led to residual contamination. In particular the historical use of the site as an airfield may have result contamination being present in the soils and groundwater. Of particular concern would be any impact from PFAS or hydrocarbons. The site is above the river terrace gravels secondary aquifer. This aquifer may be impacted by any contamination present at this site. To ensure that the development does not contribute to, and is not put at unacceptable risk from or adversely affected by, unacceptable levels of water pollution in line with paragraph 170 of the National Planning Policy Framework.

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 a remediation strategy detailing how this contamination will be dealt with, has been produced and agreed in writing with the local planning authority.

Reason(s)

To ensure that the development does not contribute to, and is not put at unacceptable risk from or adversely affected by, unacceptable levels of water pollution from previously unidentified contamination sources at the development site.

This is in line with paragraph 170 of the National Planning Policy Framework.

Prior to each phase of development being brought into use, a verification report demonstrating the completion of works set out in the approved remediation strategy and the effectiveness of the remediation shall be submitted to, and read in writing, by the local planning authority. The report shall include results of sampling and monitoring carried out in accordance with the approved verification plan to demonstrate that the site remediation criteria have been met.

Reason(s)

To ensure that the site does not pose any further risk to human health or the water environment by demonstrating that the requirements of the approved verification plan have been met and that remediation of the site is complete. This is in line with paragraph 170 of the National Planning Policy Framework.

Advice to Applicant/ LPA

It is not clear from the Environmental Statement, if and to what extent dewatering maybe required as part of site operation. We note that groundwater was encountered close to the surface in certain location during the winter. Dependent on working practice and depth of operations it is possible that significant dewatering would be required.

Dewatering is the removal/abstraction of water (predominantly, but not confined to, groundwater) in order to locally lower water levels near the excavation. This can allow operations to take place, such as mining, quarrying, building, engineering works or other operations, whether underground or on the surface. The dewatering activities on-site could have an impact upon local wells, water supplies and/or nearby watercourses and environmental interests. This activity was previously exempt from requiring an abstraction licence.

Since 1 January 2018, most cases of new planned dewatering operations above 20 cubic metres a day will require a water abstraction licence from us prior to the commencement of dewatering activities at the site. More information is available on gov.uk: <https://www.gov.uk/guidance/water-management-apply-for-a-water-abstraction-or-impoundment-licence#apply-for-a-licence-for-a-previously-exempt-abstraction>.

Please note you are likely to be required to undertake a pumping test prior to a licence being determined. Once this has been completed, a licence can take up to 4 months to be determined (and even longer at present due to heavy workload in our National Permitting Team) so early pre-application discussions are advised. We would strongly advise the applicant to carry out more detailed assessment of likely dewatering requirements such that pre-application discussion can be had.

We note that infiltration drainage is proposed at various stages of the development. Due to the variability of the strata, permeability is likely to be variable this will need to be reflected in any assessment on infiltration.

From the information provided the depth of the unsaturated zone is not clear. While we have no in principle objection to the discharge of water direct to groundwater, no contaminants should be discharged direct to groundwater. As such completely clean, uncontaminated, unaltered water can potentially be discharged direct to groundwater. If contaminants were present in the water then unsaturated zone must be present, between any discharge location and groundwater.

There may also be permitting requirements for the discharge of water containing elevated contaminants. Depending on the details of any discharge, it is possible that an Environmental Permit would not be granted.

Restoration of the quarry using inert material will need to take place under an appropriate regulatory framework. This is likely to require an Environmental Permit.

We would advise that the applicant use our enhanced pre app service to engage with ourselves to discuss the likely requirements associated with any permits or abstraction licence.

Yours faithfully

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