## creating a better place



Mr Andrew Lewis **Our ref**: WA/2021/128935/01-L01

Cherwell District Council Your ref: 20/02729/DISC

Planning & Development Services
Bodicote House White Post Road

Date: 26 March 2021

Bodicote Banbury OX15 4AA

Dear Mr Lewis

## Discharge of condition 10 (contamination remediation strategy) of 16/02446/F (for phase 9)

## Heyford Park, Camp Road, Upper Heyford, Bicester

Thank you for consulting us on the above application on 11 March 2021.

We have reviewed the following information:

- Heyford Park -western Development Phase 9,10,16 and 16A Desk Study and Ground Investigation February 2017 Issue S2-P1, prepared by Hydrock Consultants Ltd
- Upper Heyford Dorchester Phase 9 Basketball Pitch supplementary site investigation reference R1742B-L07 dated 7<sup>th</sup> August 2018, prepared by Smith Grant Environmental Consultancy
- POL pipeline supplementary site investigation reference R1742b-R21-v1 dated 26<sup>th</sup> January 2021, prepared by Smith Grant Environmental Consultancy
- Remediation strategy reference R1742d-R03-v1 dated 21<sup>st</sup> December 2020, prepared by Smith Grant Environmental Consultancy

The submitted detail is not sufficient to allow the discharge of condition 10.

Generally levels of contamination on this site are not high for soils. The remedial strategy indicates removal of soils in the area of TP102 and TP104. Plus the proposal to remove tanks and impacted soils in the POL area in the east of the site (around TP1 and TP4) and the boiler house in the centre of the site should deal with elevated hydrocarbons detected on site.

However, there is still uncertainty over groundwater quality.

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The Hydrock report in section 6.5.1 on page 31 states:

Concentrations of petroleum hydrocarbons recorded on Phase 9 and 10 were not recorded significantly higher than those recorded and presented in the Waterman report.

The Waterman report it refers to is entitled:

"Preliminary Generic Quantitative Environmental Risk Assessment Preliminary Ground Investigation, New Settlement Area, Heyford Park May 2012".

In this report, which covers the area to the east of Phase 9, the highest total petroleum hydrocarbon (TPH) concentration recorded was 28.2mg/l measured at BH-NSA-06, with all the other locations recording TPH of around 1mg/l or less.

On Phase 9, Hydrock recorded groundwater quality at 4 groundwater locations. Two of them, BH01 and BH02 recorded elevated concentrations of TPH at ~24 mg/l and ~160 mg/l respectively. These levels we would contest show that the Phase 9 area has been more impacted than the area covered by the Waterman report. BH02 lies down gradient (although not directly) from the Boiler House area. The elevated result might indicate there is gross pollution and even free phase product existing.

We will require further groundwater investigation in that area following demolition and tank removal and groundwater remedial works should not be excluded from the remedial strategy.

Therefore until this issue is resolved we are not in a position to recommend discharge of condition 10 from the perspective of groundwater quality.

In addition, the surface water drainage proposals for this phase (as required by condition 11) contain an element of surface water infiltration. While we cannot categorically say that this will cause a pollution risk based on the information we have reviewed as part of this consultation, we would advise that the applicant proceeds with some caution with the drainage designs due to the uncertainty which remains in relation to the further investigations we require.

## Closing comments

Should you require any additional information, or wish to discuss these matters further, please do not hesitate to contact me on the number below.

Yours sincerely

Miss Sarah Green Sustainable Places - Planning Advisor

Direct dial 0208 474 9253
Direct e-mail planning\_THM@environment-agency.gov.uk

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