

## Internal Memo

Date: 05/07/2022

To: Greater Cambridge Shared Planning – Mary Collins  
From: Climate, Waste and Environment – Contaminated Land  
Proposal: Demolition of existing buildings and erection of a care home (Use Class C2) with external amenity space, access, parking, landscaping and other associated works  
Site Address Former Hotel Felix Whitehouse Lane Cambridge Cambridgeshire CB3 0LX  
Reference: 21/00953/FUL

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I wish to confirm that I have received further information regarding the above application outside of the normal planning process and have considered the implications in terms of risk from potential contamination. In light of the forthcoming planning committee meeting I make these comments on behalf of the SCDC Contaminated Land Team.

The following documents have been reviewed:

- Phase 1 Desk Study by Solmek dated December 2020.
- Phase 2 Site Investigation by Solmek dated January 2021\*
- Ground Gas Risk Assessment by Solmek dated July 2021\*

\* Information not reviewed in previous consultation

The proposed residential use is sensitive to contamination, though less sensitive than a “residential with home grown produce” use case and the site has a potentially contaminative historical usage. The conceptual site model in the Solmek reports highlights some of the potential concerns for contamination, including contaminants from made ground, and the risks of ground gas from made ground and historic petrol filling stations.

The Phase 2 Investigative report indicates the majority of the site to be suitable for use, however locally elevated concentrations of PAH contamination were noted within the northern portion of the site in three locations in exceedance of the relevant GACs. Though one location coincides with proposed permanent hardstanding/building, and therefore presents minimal risk, the remaining locations do not.

There are no conclusions within the main body of the report as to whether the elevated concentrations pose an unacceptable risk, although there is a broad discussion of breaking pollutant linkages where areas are covered by buildings, hardstanding or clean cover, with the alternative being to remove impacted material from site. I note the executive summary suggests the material in a single location, TP3, should be delineated

and removed, however this is not discussed within the report. **Further clarification or lines of evidence are required to demonstrate whether the elevated concentrations are considered acceptable or whether remedial measures are required.**

In addition, the ground gas report has now been made available (which was not available at the time of the original application) and indicates no risk or further works are required with respect to ground gas. **I am in agreement with this.**

In considering this additional information, not reviewed during my earlier consultation response of 27 April 2021, my recommendations remain that the following standard contaminated land conditions are required, with part 1a already complete. This is due to clarity being sought on whether the exceedances are considered to pose an unacceptable risk and require remedial action

1. No development shall take place until:
  - a. ~~The application site has been subject to a detailed desk study and site walkover, to be submitted to and approved by the Local Planning Authority.~~
  - b. The application site has been subject to a detailed scheme for the investigation and recording of contamination and remediation objectives have been determined through risk assessment and agreed in writing by the Local Planning Authority
  - c. Detailed proposals for the removal, containment or otherwise rendering harmless any contamination (the Remediation method statement) have been submitted to and approved in writing by the Local Planning Authority.
2. Prior to the first occupation of the development hereby permitted, the works specified in any remediation method statement detailed in Condition 1 must be completed and a Verification report submitted to and approved in writing by the Local Planning Authority.
3. If, during remediation or construction works, any additional or unexpected contamination is identified, then remediation proposals for this material should be agreed in writing by the Local Planning Authority before any works proceed and shall be fully implemented prior to first occupation of the dwellings hereby approved.

Reason – To ensure that risks from land contamination to the future users of the land 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 in accordance with Policy SC/11 of the adopted South Cambridgeshire Local Plan 2018.

**Jordan Hill**

**Scientific Support Officer (Contaminated Land)**

**Climate, Waste and Environment (Environmental Planning)**