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COUNCIL**

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COMMENTS ON PLANNING APPLICATION

Reference: 24/2073/OUT Our Ref:	Date: 11/02/2025
Address: Land To North Of Little Green Lane, Croxley Green, WD3 3SP	From: Ben Firmin - Environmental Health and Licensing Team To: Claire Westwood – Development Management

Re. Outline Application: Development of up to 600 residential dwellings (Use Class C3(a)), construction of a 5-bedroom property for childrens social care and supported living (Use Class C3(b)). Two vehicular access points from Little Green Lane and further pedestrian / cycleway accesses. A one form entry primary school (Use Class F1(a)) (plus expansion land for a two form entry primary school). A mixed use local centre including provision for NHS health and social care services (Use Class E(e)), community building (Use Class F2), retail and cafe provision (Use Class E(a-c)), car parking and associated infrastructure. A country park, areas for play and recreation, allotments, community orchard and landscaping with associated infrastructure including sustainable urban drainage systems. (Layout, scale, appearance and landscape as reserved matters).

Air Quality

I have reviewed the Air Quality Assessment prepared by BWB Consulting (Report ref. LGL-BWB-XX-ZZ-LA-RP-001-AQA).

The construction phase dust assessment was undertaken to evaluate the potential impact of construction activities on local air quality, the assessment indicates that with the implementation of the recommended mitigation measures, the residual impacts from the construction phase will be not significant.

The operational phase road traffic emissions assessment was undertaken to consider the impact of development generated road traffic at identified existing receptor locations. Road traffic emissions were modelled using dispersion modelling and concentrations of NO₂, PM₁₀ and PM_{2.5} were predicted at identified sensitive receptor locations. The development is not predicted to result in any new exceedances of the air quality objectives and the impacts of the development are considered to be negligible at all modelled receptor locations.



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Pollutant concentrations were also predicted across the site. Concentrations of NO₂, PM₁₀ and PM_{2.5} were predicted to be below the relevant air quality objectives.

The impact of the proposed development on local air quality is considered to be not significant.

I would recommend that a condition requiring the submission of a dust management plan be applied to any permission granted. The Dust Management Plan should incorporate the mitigation measures presented in Section 5.14 of the Air Quality Assessment.

Land Contamination

I have reviewed the Phase 1 Geo-Environmental Assessment prepared by BWB Consulting (Report ref. LGL-BWB-EGT-XX-RP-LE-0001_Ph1).

The preliminary risk assessment has identified a number of plausible contaminant linkages that require further investigation.

An assessment of the potential risks associated with the site is considered necessary.

Based on this, the standard contaminated land condition is recommended on this **and any subsequent applications** for the site.

1. Prior to the commencement of development approved by this planning permission (or such other date or stage in development as may be agreed in writing with the Local Planning Authority), the following components of a scheme 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 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.

ii) A site investigation scheme, based on (i) to provide information for a detailed assessment of the risk to all receptors that may be affected, including those off site.

iii) The site investigation results and the detailed risk assessment (ii) 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.

iv) A verification plan providing details of the data that will be collected in order to demonstrate that the works set out in (iii) 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 express consent of the local planning authority. The scheme shall be implemented as approved.

Reason: To ensure that risks from land contamination to the future users of the land and 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.

2. Following completion of measures identified in the approved remediation scheme and prior to the first use or occupation of the development, a verification report that demonstrates the effectiveness of the remediation carried out must be produced together with any necessary monitoring and maintenance programme and copies of any waste transfer notes relating to exported and imported soils shall be submitted to the Local Planning Authority for approval. The approved monitoring and maintenance programme shall be implemented.

Reason: To ensure that risks from land contamination to the future users of the land and 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.

The above must be undertaken in accordance with the Environment Agency's 'Land contamination risk management (LCRM)' guidance, available online at <https://www.gov.uk/government/publications/land-contamination-risk-management-lcrm>.

3. Reporting of Unexpected Contamination: In the event that contamination is found at any time when carrying out the approved development that was not previously identified it must be reported in writing immediately to the Local Planning Authority. An investigation and risk assessment must be undertaken in accordance with the requirements of condition 1, and where remediation is necessary a remediation scheme must be prepared in accordance with the requirements of condition 1, which is subject to the approval in writing of the Local Planning Authority. Following completion of measures identified in the approved remediation scheme a verification report must be prepared, which is subject to the approval in writing of the Local Planning Authority in accordance with condition 1.

Reason: To ensure that risks from land contamination to the future users of the land and 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.

Ben Firmin
Environmental Protection Officer