

486529

Louise Herbert

From: Adrian Fox
Sent: 25 November 2010 09:14
To: Louise Herbert
Cc: Elizabeth Rix
Subject: FW: EA response to the Whitfield Urban Extension Draft Masterplan (Oct 2010)
Importance: High
Attachments: dps1.rtf

Louise/Elizabeth,

Please find attached a representation from the EA that needs to be entered onto the system.

Thank you

Adrian Fox
Principal Planning Officer
Dover District Council

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From: Wilson, Jennifer [<mailto:jennifer.wilson@environment-agency.gov.uk>]
Sent: 24 November 2010 15:35
To: Mike Ebbs
Cc: Adrian Fox
Subject: EA response to the Whitfield Urban Extension Draft Masterplan (Oct 2010)

Dear Mike

Please find attached our response to the above consultation.

If you have any queries, please do not hesitate to contact me.

Kind regards

Jennifer

Planning Liaison Technical Specialist

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25/11/2010

Mr Mike Ebbs
Dover District Council
Forward Planning
Honeywood Close (Council Offices) White
Cliffs Business Park
Whitfield
Dover
CT16 3PG

Our ref: KT/2006/000146/SD-06/PO1-1.01

Your ref:

Date: 24 November 2010

Dear Mike

Whitfield Urban Expansion Draft Masterplan – October 2010

Thank you for consulting us on the above draft document.

Overall we are pleased to note that matters of interest to us have been considered well in the document.

We do however have the following comments to make.

Section 9.20 – Cemeteries and Churchyards

Section 9.20 of the document states that "10 ha of land will need to be provided for cemetery and churchyard use". We are pleased to note that the document states "Subject to further detailed investigation in respect of groundwater conditions". It should be made clear that any planning application for a proposed cemetery or extension of a cemetery should be accompanied by a groundwater risk assessment. The guidelines for writing such a risk assessment are outlined in our document "**Assessing the Groundwater Pollution Potential of Cemetery Developments**".

Section 9.92

There is a small typographical error. A full stop that needs to be deleted between "basin, along the valley..."

Appendix 1, Section 1.17 – Flood Risk and Surface Water

The site lies in Source Protection Zone (SPZ) 3 for various public water supplies, therefore potable supplies are at risk from activities at this site and precautions should be taken to prevent accidental discharges and spillages to ground, both during and after construction.

The document states that SUDs are to be used for surface water drainage. In principle we would not have an objection to discharges of surface water drainage via infiltration to ground (i.e. soakaway). This would be providing the following points are adhered to, to protect groundwater quality:

- Appropriate pollution prevention methods (such as trapped gullies or interceptors) should be used to prevent hydrocarbons draining to ground from roads, hardstandings and car parks.
- Clean uncontaminated roof water shall drain directly to soakaways entering after any pollution prevention methods.
- There should be no direct discharge to groundwater and an unsaturated zone must be maintained

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Cont/d..

- throughout the year between the base of any soakaway and the water table.
- There should be no discharge into land impacted by contamination or land previously identified as being contaminated. The ground should be proven to be free from contamination.
 - Any soakaways should be kept as shallow as possible, the total depth and location of any soakaways will need to be agreed with us.

We recommend that we are consulted at the earliest possible stage, on more detailed drainage plans.

Appendix 1, Section 1.20 – Water Supply

We note that a service reservoir is proposed, however, there is no indication on Figure 9.1 (page 42), where the reservoir is to be located.

Appendix 1, Section 1.22 – Wastewater

All foul drainage should be directed to mains foul sewer. The main risk to groundwater will be during construction of any new sewers and leaks from the sewers once they are in operation.

These risks can be mitigated by utilising best practice during construction to ensure there are no accidental spillages or discharges to ground, and by ensuring an appropriate maintenance program is in place to prevent any leaks to ground once the sewers begin operation.

Again, we recommend that we are consulted at the earliest possible stage, on more detailed drainage plans.

Section 10.34 - Management Arrangements

We note that you will be requiring the long term management arrangements to be put in place to ensure the continued upkeep of facilities. Please can it be clarified what specific “facilities” this statement is referring to. We assume this will include site infrastructure such as sustainable drainage (SUDS), green infrastructure as well as any combined heat and power plant etc.

We hope you find our comments of use. If you have any queries, please do not hesitate to contact me.

Yours sincerely

MS JENNIFER WILSON
Planning Liaison Technical Specialist

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End