

Redcar & Cleveland Borough Council
Adults and Communities

Memo

From: Mr Mick Gent	To: Development Department
Job Title: Contaminated Land Officer	
Email:	Name: Mr Pedlow
Our Ref: 167142	Your Ref: R/2021/0405/FFM
Date: 21/06/2021	Response: Planning Consultation Con Land
Tel Ext: 01287 612429	

Environmental Protection Planning Consultation Response

Proposal:	ENGINEERING OPERATIONS ASSOCIATED WITH GROUND REMEDIATION AND PREPARATION AND ALTERATIONS TO ACCESS ARRANGEMENTS
Premises:	South Tees Development Corporation, Trunk Road, Redcar, TS10 5QW

Comments:

With reference to the above planning application, I would confirm that I have assessed the following environmental impacts which are relevant to the development and would comment as follows:

I note that an Enabling Earthworks and Remediation Strategy Report has been submitted in support of this application.

At the time of this application further ground investigation of the southern area of the site is being carried out in order to inform current data gaps and to investigate the current geo-environmental conditions.

The findings of these works shall be reviewed once complete to confirm the accuracy of the conceptual site model, contaminant distribution and the requirements of the remediation strategy.

The Remedial Strategy will address the risks to Human Health by capping in situ as the appropriate remedial technology to address all contaminants with the exception of volatile contaminants (e.g. benzene / naphthalene (when associated with NAPL)). Soils containing free phase NAPL or soils exceeding the hydrocarbon reuse criteria will be treated to reduce hydrocarbon concentrations. Once hydrocarbon concentrations are below the reuse criteria; these soils will be reused as fill.

In order to facilitate development a temporary cover system will be installed across the footprint of the site; comprising 200mm of site won or certified imported materials. The purpose of this capping layer is to mitigate the direct contact, or inhalation/ingestion of dust pathways that may be associated with other

contaminants which may be present, such as heavy metals or low levels of asbestos.

The proviso is that a permanent cover system will be incorporated into the design and construction works on future development.

The remediation will be conducted alongside the enabling earthworks.

Recent amendments to the strategy have been proposed by the applicant following the earthworks outlined in the strategy, whereby a specialist contractor will be employed to begin installation of a new quay wall (subject to a separate planning application). This quay wall installation will require excavation along a 110m wide strip parallel to the Tees prior to installing piles and anchor walls which will form the new quay, then filling to final levels.

To minimise any unnecessary double handling of material which will involve significant cost and time. It is proposed that works are carried out in a slightly different manner as outlined below:

- Made Ground excavated to 3.5m AOD in stippled area by main earthworks contractor.
- Excavated material and base and sides of excavation validated by Arcadis.
- Suitable material stockpiled, unsuitable material disposed of offsite or treated as appropriate.
- Arcadis to prepare interim validation report covering base of excavation and stockpiled materials.
- Quay wall contractor carries out piling and associated works and completes filling of stippled area to finished site levels using stockpiled material.
- Quay Works contractor provides validation report for backfilling to support MMP and planning application.

In tandem, the remediation strategy will be carried out as originally proposed within the remaining footprint of the R/2021/0439/CD red line boundary, with excavation and validation carried out by Halls and Arcadis.

This amendment will not materially affect the aims or outcome of the remedial works but will alter the timing and responsibilities for certain elements of the works.

The strategy report and amended proposals are satisfactory and therefore condition 16 can be partially discharged.

However, Chapter 5 discusses reporting and preparation of pre-commencement plans covering Enabling Earthworks Remediation Implementation Plan, Materials Management Plan and a Construction Environmental Management Plan which will need to be supplied to the LA for approval prior to commencement of the enabling works.

Also, because data gaps exist in the south of the site in the vicinity of the potential source area no detailed characterisation has been undertaken in this area of the site. Further data is currently being collected from across the site, including addressing these data gaps, the Conceptual Site Model and Remediation Strategy shall be

reviewed based on the findings of these works and where required updated to ensure that the strategy remains valid and comprehensive.

Additionally, changes to the remediation strategy may be required during the remediation works, as a result of encountering unexpected contamination. Should unexpected contamination be encountered, then further characterisation and risk assessment will be undertaken as required.

In order to minimise the environmental impact, I would recommend the inclusion of the following conditions onto any planning permission which may be granted:

- 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. prior to implementation of any amendments to the agreed strategy. An investigation and risk assessment must be undertaken, and where remediation is necessary a remediation scheme must be prepared which is subject to the approval in writing of the Local Planning Authority.

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

- Prior to commencement of construction, the Contractor shall prepare and submit a Construction Phase Environmental Management Plan (CPEMP) for the Works.

The CPEMP shall include:

1. Groundwater / Surface Water Management- to provide temporary drainage facilities and protection measures (such as silt fences) as necessary to ensure the site, the Remediation Works, the adjacent land and existing facilities are adequately drained and run-off managed during the course of the Work
2. Air Quality and Dust Management Plan- to ensure adequate dust control measures are set in place and to ensure contaminated material is not tracked onto the public highway. This plan should also consider the movement of odorous and volatile organic materials and suitable vehicle cover systems.
3. Asbestos -A reassurance monitoring plan and program shall be developed and implemented for asbestos air monitoring shall be prepared
4. Noise and Vibration- Prior to commencement on site noise and Vibration data will be taken to establish baseline conditions. Trigger levels to prevent unacceptable impacts to receptors shall be identified within the CPEMP and agreed with the LPA.

Reason : To ensure that risks from construction enabling works 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