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:	168503		
Date:	13/09/2021	Your Ref:	R/2021/0713/CD
Tel Ext:	01287 612429	Response	Planning Consultation Con Land

Environmental Protection Planning Consultation Response

Proposal:	**PARTIAL DISCHARGE OF CONDITION 16 OF OUTLINE PLANNING APPLICATION R/2020/0357/OOM OF PHASE 2 FOR DEMOLITION OF EXISTING STRUCTURES ON SITE AND THE DEVELOPMENT OF UP TO 418,000 SQM (GROSS) OF GENERAL INDUSTRY (USE CLASS B2) AND STORAGE OR DISTRIBUTION FACILITIES (USE CLASS B8) WITH OFFICE ACCOMMODATION (USE CLASS B1), HGV AND CAR PARKING AND ASSOCIATED INFRASTRUCTURE WORKS ALL MATTERS RESERVED OTHER THAN ACCESS**
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:

The location plan shows that the discharge condition is for a small portion of land outlined in red on the location plan which is included within the wider South Bank Area A.

I note that a Detailed Quantitative Risk Assessment (DQRA) South Bank May 2012 and draft July 2021together with an Enabling Earthworks and Remediation Strategy Report have submitted in support of the partial discharge of condition 16 of outline planning application R/2020/0357/OOM. These reports look at the wider South Bank Area A.

The DQRA refers to the assessment of pollutant linkages relating to human health are presented in the Arcadis GQRA (2021), this has not been submitted as part of this application, however the GQRA concluded that for Human Health, concentrations of lead, benzene, dibenzofuran, and PAHs were measured exceeding the GAC in soil.

Concentrations of contaminants were not measured above the GAC derived for the protection of human health in groundwater.

NAPL and tar were identified primarily within the Made Ground in a couple of locations. Asbestos was recorded in 7no. of the Made Ground samples and this poses a potential chronic risk to human health and has implications for remedial costs.

The Enabling Earthworks and Remediation Strategy Report states that additional ground gas monitoring at greater density is recommended prior to any specific redevelopment to determine the risk from ground gases on the site, the scope of this investigation and any subsequent remedial requirements would depend on the proposed redevelopment scenario.

The DQRA findings states of the GQRAs currently provide an appropriate level of assessment based on what is known of the planned redevelopment scenario and further human health assessment has therefore not been undertaken at this stage within the DQRA.

However, the DQRA recommends that risks to human health are considered at the design stage of any proposed redevelopment with regards to dermal, ingestion and inhalation pathways.

In respect to water resources a risk assessment has been undertaken using Remedial Targets Worksheet (RTW) to back-calculate evaluation criteria, or water resource SSAC

From historical use of the July draft DQRA states that site potential sources of contamination include

- Made Ground source from across the site – considered to comprise a single diffuse soil source associated with Made Ground and slag.
- Groundwater source in the vicinity of SBC_AUK_BH110 – considered to represent contamination associated with the SBCO area and also the location of identified non-aqueous phase liquid (NAPL).

The report states the main identified water resource receptor being the River Tees.

The July DQRA draft report states that at present, further data collection is planned, primarily comprising additional groundwater. At the time of writing three rounds have been completed for SBA. The report, therefore, represents an initial draft assessment which will be updated once the full proposed data set is available.

The report concludes that although concentrations of several TPH fractions were measured exceeding the 50m SSAC but no fractions exceed the 360m SSAC however, Benzene, naphthalene and cyanide were found to exceed the 360m compliance point SSAC.

None of the measured concentrations exceeded the SSAC incorporating dilution within the River Tees, and therefore, the report states it is not considered to present a significant risk to the identified water resource receptor (River Tees)

Sufficient information has been submitted to partially discharge condition 16 however the applicant is advised that there are a number of conditions on the Outline Approval (R/2020/0357/OOM) that are required to be discharged and complied with in the implementation of the application hereby approved.

The applicant is also advised that further risks to human health are to be considered at the design stage of any proposed redevelopment with regards to dermal, ingestion and inhalation pathways.