

Redcar & Cleveland Borough Council
Adults and Communities

Memo

From: Mr Mick Gent	To: Development Department
Job Title: Contaminated Land Officer	Name: Mr Pedlow
Email:	Your Ref: R/2021/1048/FFM
Our Ref: 172461	Response Planning Consultation Con Land
Date: 12/05/2022	
Tel Ext: 01287 612429	

Environmental Protection Planning Consultation Response

Proposal:	ENGINEERING OPERATIONS ASSOCIATED WITH GROUND REMEDIATION FURTHER CONSULTATIONS RE PHASE 1 ENVIRONMENTAL ASSESSMENT AND SITE CONDITION REPORT, GENERIC QUANTITATIVE RISK ASSESSMENT AND DETAILED QUANTITATIVE RISK ASSESSMENT REPORT NO: 10035117-AUK-XX-XX-RP-ZZ-0428-02-LWOW_DQRA
Premises:	Tees Works, Trunk Road, 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 further reports including a Phase 1 Environmental Assessment and Generic Quantitative Risk Assessment and Detailed Quantitative Risk Assessment Report have been submitted in support of this application.

The **Phase 1 Environmental Assessment** aimed to provide information on potential development constraints prior to carrying out enabling works, to be used to assess potential environmental risks which may be associated with redevelopment of the site. The objective of the assessment was to collate and review previously available geo-environmental information to determine potential ground contamination risks associated with the site in its current condition and with regards to its future development prospects.

The report states that a walkover was carried out (April 2022) and that ongoing demolition works were occurring at the time, and therefore visible inspection was limited to external areas only and due to the presence of structures it was not possible to investigate a limited number of areas. Due to this, the report states that

there are data gaps and recommends additional ground investigation be carried out in these areas once demolition/clearance works have been completed.

The Preliminary Conceptual Site Model and Preliminary Qualitative Risk Assessment considers the overall risk to the environment is considered to be Low, based on the information contained within the report and given the limited sensitivity of the receptors and the wider industrial nature of the area.

However, the report states that further investigation should be carried out in a limited number of areas which have not been accessible due to structures etc. and further assessment of the risk to surface water and controlled aquifers will be required. The report also states that a remedial and earthworks strategy and a construction phase environmental management plan will need to be developed to ensure any risk is not exacerbated during the enabling earthworks.

The ground investigation should focus on understanding presence and extent of made ground on site, and the contaminants within the made ground, which would enable assessment if potential pollutant linkages do exist and recommendations for further works / mitigations as part of the redevelopment

A further **Generic Qualitative Risk Assessment (GQRA)** was carried out in relation to Human Health which states that it is expected that any risks associated with permanent ground gas, and subsequent in-building mitigation measures required (e.g. building controls) will be the responsibility of the developer, and as such, this linkage has not been assessed as part of this GQRA/DQRA. It is also understood that the DQRA in relation to controlled waters is to be dealt with by the Environment Agency.

In conclusion the findings of the GQRA indicated a potential chronic exposure risk to human health (on-Site industrial worker) from asbestos fibres in shallow soils and additionally from measured concentrations of PAH and tar in a limited number of locations. The driving pathways of concern were direct contact exposure with shallow soils or inhalation of dust generated from shallow soils.

The potential risks to future on-Site industrial workers and surrounding land users are anticipated to be mitigated as part of the development works, on the basis that:

- Where buildings and hardstanding are absent, it is unlikely that soils will remain uncovered i.e. soft landscaping will be in place. Importation of clean soils in landscaped areas would be required given that Made Ground is not considered to represent a suitable growing medium, which would break the direct contact and dust pathways provided designed appropriately.
- Removal of shallow tars and NAPL is planned as part of remedial works to be undertaken at the Site, irrespective as to whether they represent a potential risk.

Further to the submission of the Phase 1 Environmental Assessment and Generic Quantitative Risk Assessment / Detailed Quantitative Risk Assessment Report, I would recommend that:

- Additional ground investigation and risk assessment shall be carried out when all structures have been demolished.
- A Construction Phase Environmental Management Plan as stated in the Phase 1 Environmental Assessment shall be submitted for the approval of the local authority.
- Following completion of measures identified in the Enabling Earthworks and Remediation Strategy, a validation report that demonstrates the effectiveness of the remediation carried out must be produced which is subject to the approval in writing of the Local Planning Authority to include:
 1. Reporting of the verification works to provide evidence that the remediation works which have been undertaken are in accordance with the Enabling Earthworks and Remediation Strategy and briefing note.
 2. A note stating that any future applicant carries out further ground gas investigation to quantify the ground gas risk on the site in the context of the proposed layout and design.
 3. A note suggesting that further site investigations/ remedial actions will be necessary for any future potential piled foundations and process pipelines.
- Further final verification report stating that no unexpected contamination was found at the site and for the areas it was that the appropriate actions were carried out to render the site suitable for use shall be submitted for the approval of the local authority.