

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: 171287	
Date: 24/06/2022	Your Ref: R/2022/0096/CD
Tel Ext: 01287 612429	Response Planning Consultation Con Land

Environmental Protection Planning Consultation Response

Proposal:	PARTIAL DISCHARGE OF CONDITION 16 ON PLANNING APPROVAL FOR THE DEMOLITION OF EXISTING STRUCTURES ON SITE AND THE DEVELOPMENT OF UP TO 418,000 SQM (GROSS) OF GENERAL INDUSTRY (USE CLASS B2) AND STORAGE AND 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:	land off, Tees Dock Road, Middlesbrough, TS6 6UE

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 to partially discharge condition 16 on planning approval R/2020/0357/OOM.

The overarching aim of the works is to deliver a sustainable ground remediation strategy for the contract sites which is compliant with regulatory needs (Local Authority and Environment Agency) and has their approval in principle. The strategy has been produced to identify an applicable remediation strategy for the site, and on the assumption that any redevelopment of the site will be for a generic commercial industrial end use.

The remediation strategy report refers to Draft South Bank Former Steelworks Redcar, Detailed Quantitative Risk Assessment, 10035117-AUK-XX-XX-RP-ZZ-0331-02-SB_DQRA, prepared by Arcadis for South Tees Development Corporation, dated September 2021 [Arcadis 2021c] which supersedes Detailed Quantitative Risk

Assessment South Bank Area A, 10035117-AUK-XX-XX-RP-ZZ-0270-01-SBA_DQRA.

For Human Health the DQRA reports that GQRAs undertaken for SBA, SBB and SBC, were that concentrations of arsenic, lead, benzene, dibenzofuran, 1,2 dichloroethane and PAHs were measured exceeding the Generic Assessment Criteria (GAC) in soil, however the DQRA suggests that in relation to human health, the GQRA undertaken is considered to provide an appropriate level of assessment based on what is known of the planned redevelopment scenario and therefore, human health assessment is not included further within the scope of the DQRA.

The Enabling Earthworks and Remediation Strategy Report for Human health s2.7 however, reiterates the review of the previously conducted ground investigations identifying concentrations of lead, benzene, cyanide, dibenzofuran, NAPL and PAHs measured in excess of the Generic Assessment Criteria (GAC) in soil, driven by direct contact exposure and dust inhalation with respect to the risk to human health will be needed as part of the remedial strategy but states that these will need to be further considered in the remedial strategy for the site.

The conclusions of the GQRA undertaken were that concentrations of arsenic, lead, benzene, dibenzofuran, 1,2 dichloroethane and polycyclic aromatic hydrocarbons (PAHs) were measured exceeding the GAC in soil for the protection of human health. It was recommended that risks to human health are considered at the design stage of any proposed redevelopment with regards to dermal, ingestion and inhalation pathway.

Given that, the DQRA is principally concerned with controlled waters I would recommend that the report is forwarded to the **Environment Agency** for any comments they may wish to make on the controlled waters element of the DQRA report

Materials identified for reuse will be required to be tested prior to placement to demonstrate compliance with the reuse criteria.

The strategy report states that a reassurance monitoring plan and program will be developed and implemented for asbestos air monitoring will be prepared as a component of the CEMP. Baseline data will be collected as part of this plan to allow the impact of the works on the surrounding environment to be determined and allow the success of control measures undertaken to protect the site workforce and neighbouring receptors to be assessed.

Section 5 Reporting -This section states the information that will be submitted when the remedial works have been carried out with verification reports submitted for approval as stated in the strategy reports.

Provided that risks to Human health during the enabling and remedial works are managed including air monitoring, as detailed in the enabling and remediation strategy and that all information stated in section 5 is reported to the LA on

completion of the enabling works; the approach and methodology in principle is satisfactory to partially discharge condition 16.