



MEMORANDUM

From: Toni Slater Public Protection
Service Manager

To: David Williams Planning
Control Manager

Our Ref:

Your Ref: P/2016/0990

Date: 11-11-2016

Town and Country Planning Act 1990

Town and Country Planning (General Development Procedure) Order 1996

Re: P/2016/0990, Site of Former Sharp Precision

APPLICATION FOR APPROVAL OF DETAILS RESERVED BY CONDITIONS IMPOSED UNDER PLANNING PERMISSION CODE NO P/2015/0583: CONDITION 3 - SCHEME TO DEAL WITH POTENTIAL CONTAMINATION. CONDITION 9 -SCHEME FOR THE COMPREHENSIVE AND INTEGRATED DRAINAGE OF THE SITE

Contaminated Land

ZP01B - Contaminated Land - Phased Investigation

WYG REMEDIATION STRATEGY, SEPTEMBER 2016

The above report has been submitted regarding the discharge of condition 3. I have the following comments on this report and would advise that the condition is not discharged until these matters have been clarified to the satisfaction of the Contaminated Land Team.

1. The second paragraph of Section 4.1.1 states that a damp proof membrane is suitable to mitigate the effects of radon, based upon BRE Report BR211 (2015) Radon: Protective measures for new buildings guidance. It then goes on to state "Gas protection measures for the proposed building will therefore comprise either the following Option 1.... Or Option 2...". Neither of the options refer to a membrane therefore I interpret this as the damp proof membrane being the membrane that protects against methane and carbon dioxide gas ingress. However BR211 does not provide guidance on measures for methane, carbon dioxide and hydrocarbon vapours and reference should be made to the appropriate guidance such as BS8485:2015 (Table 7 states the membrane is required to be impervious to the relevant gases (i.e. methane and carbon dioxide)) and CIRIA VOC guidance (with regard to protection against the risk from hydrocarbon vapours). It is noted that Spilman Associates Ltd report in Appendix G does however reference this guidance but little if any mention is made of the verification being in compliance with CIRIA C735. Therefore final clarification on the type of gas protection membrane to be used is required and what verification will be undertaken.

2. As is stated, both of the two options proposed involve active measures which will therefore require long term maintenance programmes to be in place for the lifetime of the building. Therefore provision for this long term maintenance should be made and information supplied to the Council which will demonstrate that this provision is in place.
3. In accordance with BS8485, the installation of the gas membrane should be by a qualified person. In addition reference has not been made to undertaking the installation in accordance with the manufacturers instructions, just that it will be done in general general accordance with BS8485.
4. In 3.2.2 and 3.3.2 it is noted that some contamination has been observed however there is limited discussion about this in relation to the findings of the SI and therefore it is not clear what risk assessment has been undertaken of these areas.
5. It is noted that a brief procedure for dealing with unexpected contamination is provided in section 4.1.3 and this is sufficient, in addition to notifying the Council should any unforeseen contamination be found, the checks and records on this matter should be detailed in the Verification Report required to be submitted under Condition 4.
6. It is noted that section 6.2 provides details of the proposed testing regime for excavated and imported soils, this is not in accordance with the Councils adopted guidance, a copy of which is enclosed.
7. There is a bund shown on the proposed development drawings, what is this for and what will be used to construct it? Depending on the response to these queries will depend on what requirements will be in place for verification purposes.
8. Details of what measures were in place and used for the management of contaminated water (referred to in section 5.3) should be provided in the Verification Report.

Environmental Protection

No Comments

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Head of Planning and Environment