

Cerys Jones

From: Sharon Holman
Sent: 06 July 2021 13:51
To: planning_admin
Subject: FW: P 2021 0494 - Pacific Park - Condition 6 (Contamination) Summary Responses

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From: Rebecca Hodnett <rhodnett@e3p.co.uk>
Sent: 29 June 2021 16:17
To: Neil Campbell <neil@pace-architecture.co.uk>
Subject: RE: P 2021 0494 - Pacific Park

Hi Neil,

As we discussed earlier I have summarised our view of the EHO comments below in red:

1. Section 2.2 – It is noted that intrusive site investigation works could not be undertaken on the area of concrete hardstanding in the south of the site. Is it your intention to undertake future works in this area, especially given that elevated levels of contaminants were identified in WS101, WS106 and CP102 which are adjacent to this area? **Yes – it will be outlined within the Remediation Strategy that works should be completed in the areas in which investigation was limited along with a watching brief during the remediation works to ensure no visual contamination.**

2. Section 4.2 (Non-volatile PAH) – I am in agreement that the elevated non-volatile PAH compounds identified during the site investigation can be mitigated through the installation of a suitable cover system. It is understood that the specific design and installation of the cover system will be detailed in the site remediation and enabling works strategy, in accordance with the requirements of condition 6 this strategy must be submitted to the Planning Department for written approval. **To be completed and submitted as part of the remediation strategy.**
3. Section 4.2 (SVOCs) – The lines of evidence approach for the SVOCs is satisfactory and I am in agreement that no remedial works are required. **No further works required.**
4. Section 4.2 (PCBs) – It may be useful to put into context the PCB history on the industrial estate which may further inform your proposed remedial strategy with respect to the identified PCB contamination found in WS101.

The PCB contamination on the industrial estate is due to a historic former capacitor factory which is understood to have caused widespread PCB contamination. The area was remediated in 1987 in regard to the PCB impacted soils:

- Heavily contaminated soils (PCB concentration >10,000 mg/kg) were sent off site for incineration.
- Less contaminated soils (PCB concentration >20 mg/kg to <10,000 mg/kg) were moved into the purpose built PCB containment cell.
- Soils with a PCB concentration of <20 mg/kg were deemed to be safe to leave onsite.

A site known as Georgia Pacific, in close proximity to the development site, has since undergone further assessment and remediation for development purposes. As part of these works a site specific assessment criteria was derived for PCB Aroclor 1254 of 7.2 mg/kg by BAE Systems in 2006 and accepted by the Council.

It is acknowledged that a significant amount of time has passed since the above remedial works were undertaken but it may assist you in developing an appropriate remedial strategy for the identified PCB contamination and adopting an appropriate GAC or SSAC in the wider context of the industrial estate.

Further details of the proposed remedial works should be provided in the site remediation and enabling works strategy, with full justification of the chosen GAC or SSAC, to include a discussion on the risk the identified PCBs may pose via vapour in indoor air. **As advised we will include further information within the remediation and enabling works strategy**

5. Section 4.2 (Asbestos) – It is noted that asbestos fibres (chrysotile and amosite) have been identified within the made ground but no visual signs of ACM have been encountered during the investigation, but it is likely that trace fibres are present within the made ground across the site.

In areas with <0.001% asbestos it is proposed to leave in situ and have an appropriate level of asbestos management during the construction phase of the development, i.e. dust suppression. In the two locations, WS101 and TP108, with 0.002% asbestos it is proposed to further delineate and remove the impacted ground with placement in an area of low sensitivity.

I am in agreement in principal, however, specific details of how the above remediation proposals will be managed on site, who the licensed contractor will be and how it will be undertaken in accordance with current guidance and legislation must be detailed within the site remediation and enabling works strategy that is still to be submitted and approved in writing. **The remediation strategy will detail contractor responsibilities when dealing with asbestos impacted soils in line with the above.**

6. Section 4.3.2 – I am in agreement that no remedial works are required with respect to controlled waters. **NRW has also confirmed no objection and issue in relation to controlled waters at the site.**
7. Section 4.4 (Ground Gas) – Preliminary ground gas monitoring results do indicate that gas protection measures may not be required, however I cannot agree this until the monitoring has been completed and all the results and subsequent risk assessment has been submitted to the Planning Department for written approval. **Ground gas addendum with all results to be issued shortly; risk assessment currently being undertaken.**
8. Section 4.3 (Potable Water Supply) – I am in agreement that barrier pipe will be required, confirmation of this should be provided within the validation report that must be submitted for approval in accordance with condition 7 of permission P/2020/0603. **Agreed; a water pipeline risk assessment should be completed following remediation and enabling works.**
9. Section 5.13 – The results of the further investigation of inaccessible areas in the vicinity of the former pond should be submitted to the Planning Department for comment. **The works required will be summarized within the Remediation Strategy, and once complete issued as an addendum report or within the validation report.**
10. It is noted that topsoil is to be imported to site for the soft landscaped areas, all imported material must be tested for contamination and assessed for its suitability for the proposed development. A suitable methodology for testing this material should be submitted to and approved by the Council prior to the soils being imported onto site. The methodology should include the sampling frequency, testing schedules, criteria against which the analytical results will be assessed (as determined by risk assessment) and source material information. **The methodology for assessment of topsoil will be summarized within the Remediation Strategy.**
11. Should any material be removed from site then copies of all waste transfer notes must be included within the validation report to demonstrate that it has been appropriately disposed of. **Agreed; these will be part of the validation report.**
12. As stated above the site remediation and enabling works strategy must be submitted to the Planning Department for written approval in accordance with the requirements of condition 6. **Remediation Strategy to be submitted shortly.**

Kind regards

Becky

Kind Regards

Rebecca Hodnett

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