From: Liam Griffiths <LiamG@asbriplanning.co.uk>
Sent: 08 July 2021 12:29
To: Roberts, Geraint (Principal Planning Officer) <GeraintN.Roberts@newport.gov.uk>
Cc: thomas.james@engie.com; Emma Harding <emma@asbriplanning.co.uk>
Subject: RE: 20.1242 - Land To South Of Glan Usk Primary School Herbert Road - Remedial Strategy

Hi Geraint,

Further to the below please see response and attachments.

In summary
Foundation solution and piling method has already been covered off on previous emails confirming this was dictated by the Geo-technical ground investigation reports along with Welsh Water trunk sewer dictating a Auger piling foundation solution.

Over the development we will generate approx. 150m3 of arising from the piling method. Any arising will be contained under the sites no dig barrier under hard standing areas in-line with the remediation strategy out of the public realm to bring levels up to formation to support the sites design. This material is heavily diluted due to the depth of clean soils mixed with a zone of partial contaminated material. Any water brought up with the auger rig will be contained locally around rig and again been localised to this location and also contained below the no dig barrier level.

Engie consulted NRW over drainage works where they asked NRW (Alex Bowder NRW Senior Environment Officer) about groundwaters when doing deep drainage work and due to the volume of water being generated is minimal it could be recirculated locally from where it was extracted i.e back into the ground. There was no concern from NRW. Email attached.

The site has a U1 licence in place and Material Management plan in place all approved by NRW which capture Groundwater (Attached).

Two question on his email:
A quick read up on CFA tells me concrete is pumped into the excavation as the auger is removed so there is a direct replacement of contaminated soils with concrete. This may be sufficient to seal the borehole and prevent migration of contaminated waters? Yes, concrete is pumped into the hole and then a reinforced cage. This is sealed by concrete.

The next question is what happens to the contaminated arisings from the boring exercise? The *Combined Method & Risk for CFA Piling* submitted with this application says the following: Arising will be used under the no-dig barrier levels to bring levels up to formation levels to support designs.

The tables presented below are extracted from the site investigation report to site wide activities not specific to piling.

Tables 3.1
This has no relevance to piling activities nor does it reference piling activities In the pathways. The list of 8 items will be managed under different site activities under a different subcontractor not the piling contractor.
Made Ground: This has been highlighted but only references potable water not piling. Welsh water have used Barrier pipe across the site for incoming mains as protection against contamination

Table 3.2

Surface water: Groundworker is to be managed Surface water site wide but ground is permeable so after a heavy down pour it infiltrates into the ground. Any water on hardstanding goes into the Welsh Water approved water system under a S104 (adoptable drainage).
Made Ground: Contaminates will be contained and separated below the no dig areas in-line with remediation strategy.
Contamination Groundwaters: Low risk as report state to confined perched groundwater**.** A perched water table (or perched aquifer) is an aquifer that occurs above the regional water table.
Contamination Groundwaters: Volume of any water is so minimal if any is extracted its dealt with locally in-line with the comment made by Alex Bowder NRW Senior Environment Officer (See email)**.** The reen has concrete lined walls so no leaching can occur from seepage.

There are a number of other activities which tables 3.1 and 3.2 Impact but piling has low risk and any risk or water is dealt with locally and contamination is dealt with inline with MMP and Remediation strategy.

The NRW comments stated the following:

Land Contamination

From the information submitted, it has been noted that the piling method to take place for phase 3 of the development would be bored piling as opposed to the displacement piling used for phase 2. We do not recommend using the bored piling method as there is potential for a new 'preferential' pathway to be created which could lead to the migration of any contamination that may be present.

The piling condition for phase 2 of the development was partially discharged on the basis of a 2018 letter report, ref: HAD/AH/P180132/F180133.Lump-Sum.RevF. We advise this report be updated which demonstrate that:

- proposed piling for phase 3 will not result in the migration of any contamination that maybe present, and;
- risks of mobalising contamination have been considered.

Croesewir gohebiaeth yn y Gymraeg a'r Saesneg
Correspondence welcomed in Welsh and English

If the report is updated to include consideration of the information presented above, we would review our position on the matter.

We have previously provided updated method risk statements as requested by NRW which I've reattached. We provide further commentary on the NRW comments. Firstly it doesn't appear they understand the boundary of phase 3 as the majority of the development is receiving driven piles but only a small number of plots are being piled for the reason we have discussed previously over Welsh Water 2m trunk sewer being the only method they would accept to allow the development to go ahead. NRW use the word "*recommend"* so this suggests to me its their preference not to use bored piled but unfortunately this has been dictated by Welsh Water due to the trunk Sewer not ourselves. The number of plots bored and reasons of Welsh water need to be raised clearly to NRW along with the MMP and U1 they have approved for site activities to take place.

I've attached a plan showing the plots to received a bored pile are the ones within the easement shown:

Plots 161-166
Plots 152-153
Plots 154-155
Plots 150-151
Plots 133-137

Please could NRW be reconsulted as soon as possible with the information we have provided to date including the emails prior to this. If NRW respond to raise no objections is there any reason the condition cannot be discharged please?

Should you have any queries please do not hesitate to contact me.

Thanks,

Liam Griffiths – Planner

Asbri Planning Ltd | T: 02920 732652 | M: 07943 835843 | W: http://www.asbriplanning.co.uk

From: Liam Griffiths
Sent: 08 July 2021 11:36
To: 'Roberts, Geraint (Principal Planning Officer)' <GeraintN.Roberts@newport.gov.uk>
Cc: 'thomas.james@engie.com' <thomas.james@engie.com>; Emma Harding <emma@asbriplanning.co.uk>
Subject: RE: 20.1242 - Land To South Of Glan Usk Primary School Herbert Road - Remedial Strategy

Hi Geraint,

Further to the below I wanted to confirm I'm back from leave.

We are working on the response which is almost complete and aim to issue before the end of today.

Should there be any issues with this please let me know.

Thanks,

Liam Griffiths – Planner

Asbri Planning Ltd | T: 02920 732652 | M: 07943 835843 | W: http://www.asbriplanning.co.uk

From: Liam Griffiths
Sent: 30 June 2021 14:54
To: 'Roberts, Geraint (Principal Planning Officer)' <GeraintN.Roberts@newport.gov.uk>
Cc: 'thomas.james@engie.com' <thomas.james@engie.com>; Emma Harding <emma@asbriplanning.co.uk>
Subject: RE: 20.1242 - Land To South Of Glan Usk Primary School Herbert Road - Remedial Strategy

Hi Geraint,

Thanks for the response.

We will look to get the further details across to you I have CC'd Tom Engie.

I'm on annual leave for a couple of the coming days please could we have until the end of next week 09/07/21 to respond?

Thanks,

Liam Griffiths – Planner

Asbri Planning Ltd | T: 02920 732652| M: 07943 835843 | W: http://www.asbriplanning.co.uk

From: Roberts, Geraint (Principal Planning Officer) <GeraintN.Roberts@newport.gov.uk>
Sent: 30 June 2021 14:31
To: Liam Griffiths <LiamG@asbriplanning.co.uk>
Subject: RE: 20.1242 - Land To South Of Glan Usk Primary School Herbert Road - Remedial Strategy

Hello Liam

Thanks for providing this and many apologies for the delay in getting back to you on this.

I've taken the risk assessment below from the *'Geotechnical & Geo-environmental Site Investigation Report: Proposed Residential Development Herbert Road Newport'* (February 2017) which was submitted with application 18/0293:

Table 3.2 – Qualitative Preliminary Environmental Risk Assessment					
Potential Source	**Pathway**	**Receptor During Construction**	**Level of Risk**	**Receptor Post Construction**	**Lev**
Surface Water	**Run-off**	Site and Adjacent Sites Shallow/Perched Groundwater	Low	Site and Adjacent Sites Shallow/Perched Groundwater	Low
Accidental spillage	**Run-off , digging foundations, moving contaminated soil, drainage misconnections, discharges to local surface waters or the ground, construction materials and/or exposed ground, wheel washings, oil or chemical spills**	Site and Adjacent Sites	Low *On site proceedures will ensure that all efforts are made to prevent accidental spillage*	N/A	N/A
Made Ground	**Leaching of contamination**	Shallow/Perched Groundwater	Medium Risk	Shallow/Perched Groundwater	Mec
Contaminated Groundwater	**Direct migration and Perched Groundwater migration**	Secondary A Aquifer	Low Risk *Superficial alluvium acts to confine perched groundwater above underlying bedrock*	Secondary A Aquifer	Low *Sup con grou und*
Contaminated Groundwater	**Groundwater Migration**	River Usk	Medium Risk	River Usk	Mec

Table 3.1 - Qualitative Preliminary Human Health Risk Assessment					
Potential Source	**Pathway**	**Receptor During Construction**	**Level of Risk**	**Receptor Post Construction**	**Level of Risk**
Made ground	**Ingestion, inhalation and dermal contact with soil and soil dust**	Construction Workers	Medium Risk	Future residents Maintenance Contractors	Medium Risk
Made ground	**Inhalation of soil dust**	Neighbouring site users and passers-by	Low Risk	Neighbouring site users and passers-by	Low Risk
Made ground	**Inhalation of asbestos fibres**	Construction Workers Neighbouring site users and passers-by	Medium Risk	Future residents Maintenance Contractors Neighbouring site users and passers-by	Medium Risk
Made ground	**Inhalation of Vapours**	Construction Workers	Low Risk	Future residents Maintenance Contractors	Low Risk
Radon Gas	**Inhalation** *Accumulation of gas indoors in confined spaces- asphyxiation and explosion*	N/A	N/A	Future residents	Unacceptable Risk *BGS confirm BASIC required for new build*
Landfill Gas	**Inhalation** *Accumulation of gas indoors in confined spaces- asphyxiation and explosion*	N/A	N/A	Future residents	No Risk *Landfill lies on opposi Usk*
Ground Gas	**Inhalation** *Accumulation of gas indoors in confined spaces- asphyxiation and explosion*	N/A	N/A	Future residents	High Risk *Potential gas where n peat present.*
Made Ground	**Ingestion of potable water** *Absorption of contamination from made ground into potable water pipes*	N/A	N/A	Future Residents	Medium Risk

I think these tables give you the framework for Q3 of the Piling Risk Assessment below i.e. how will the risks above be mitigated if CFA piling is used on part of the site?

A quick read up on CFA tells me concrete is pumped into the excavation as the auger is removed so there is a direct replacement of contaminated soils with concrete. This may be sufficient to seal the borehole and prevent migration of contaminated waters?

The next question is what happens to the contaminated arisings from the boring exercise? The *Combined Method & Risk for CFA Piling* submitted with this application says the following:

	• Fuel consumption & exhaust emissions		person using their ow
Piling operations	• Generation of large volumes of spoil. • Likely for some of the spoil to be contaminated, particularly on brownfield / reclaimed land which may need to be treated as hazardous waste	High	• Choice of work meth • Correct disposal rou • Ensure type of grou contaminated. If con
			• Reduction at design

But this is all a bit generic – we might need something a bit more specific on this point.

Which is to say I don't think I can agree the discharge yet unless the risks identified in Tables 3.1 & 3.2 can be shown to be adequately addressed.

Can you get back to me by 07/07/2021 in the first instance?

Geraint N. Roberts

Prif Swyddog Cynllunio / Principal Planning Officer
Tîm yr Dwyrain / East Team
Adfywio, Buddsoddi a Thai / Regeneration, Investment and Housing
Cyngor Dinas Casnewydd / Newport City Council
01633 210094

From: Liam Griffiths <LiamG@asbriplanning.co.uk>
Sent: 11 June 2021 14:53
To: Roberts, Geraint (Principal Planning Officer) <GeraintN.Roberts@newport.gov.uk>
Cc: Emma Harding <emma@asbriplanning.co.uk>; thomas.james@engie.com
Subject: RE: 20.1242 - Land To South Of Glan Usk Primary School Herbert Road - Remedial Strategy

Hi Geraint,

Further to the below I have asked Tom from Engie to advise on the information you require and this is set out below alongside details that are pertinent to consider in the piling method being proposed.

Firstly we wanted to iterate that this hasn't been a cost cutting exercise, this has been led by structural stability of what will be accepted by NHBC/BC along with what Welsh Water are dictating as a safe means of piling method over their sewer.

Foundation Solution: Terra Firma were instructed as the Geotechnical Engineer to undertake intrusive site investigation on the ground conditions. The findings of the investigation works are all confined in the SI reports on the link below which all stipulate a piling foundation solution due to very weak red brown clays, peat and grey mudstone combined with the fact that this localised area is filled with made ground so shallow foundations were not supported. https://we.tl/t-hcbESXqA4P

1) Determine initial preferred piling* method on structural, geotechnical and commercial considerations

2) Is the site affected by contamination of soil or groundwater? Yes, please see SI report.

3) Are there any potential adverse environmental impacts which could be affected or created by proposed piling* method? Yes, Welsh Waters Mainline Trunk sewer. Drawing attached indicating location of Sewer. Drawing attached showing impacted plots

4) Are there practical alternative construction methods that avoid the pollution hazard? (e.g construction of buildings on rafts). No, Site investigation report compiled by Terra Firma has stipulated a piling solution due to the poor ground conditions wouldn't support a shallow foundation solution. Welsh Water would not accept driven Piles due to their Trunk Sewer being beneath these properties. This trunk sewer is 2.1m in diameter and is running at full bore taking Newport and the surrounding areas sewerage to Newport chemical plant. Bored piles was solely

led by Welsh Water following an extensive investigation prior to the sale of the land where they would not accept another means of piling above their main line trunk sewer. If this method wasn't applied the land would become redundant due to it being undevelopable. Full copy of document provided

5) Carry out risk assessment:

6) Are any of the potential adverse environmental impacts considered to be significant? Yes, contamination zone of made ground.

7) Determine QA/QC procedures necessary for verification of mitigation measures: Van-Elle piling contractor provided RAM's in accordance with mitigating risk when piling. RAM's provided and signed off with Engie Health and Safety department.

I hope this clears up the reasoning for the method proposal and should you have require any further informaiton please do not hesitate to contact me.

Please note Tom is on leave next week.

Thanks,

Liam Griffiths – Planner

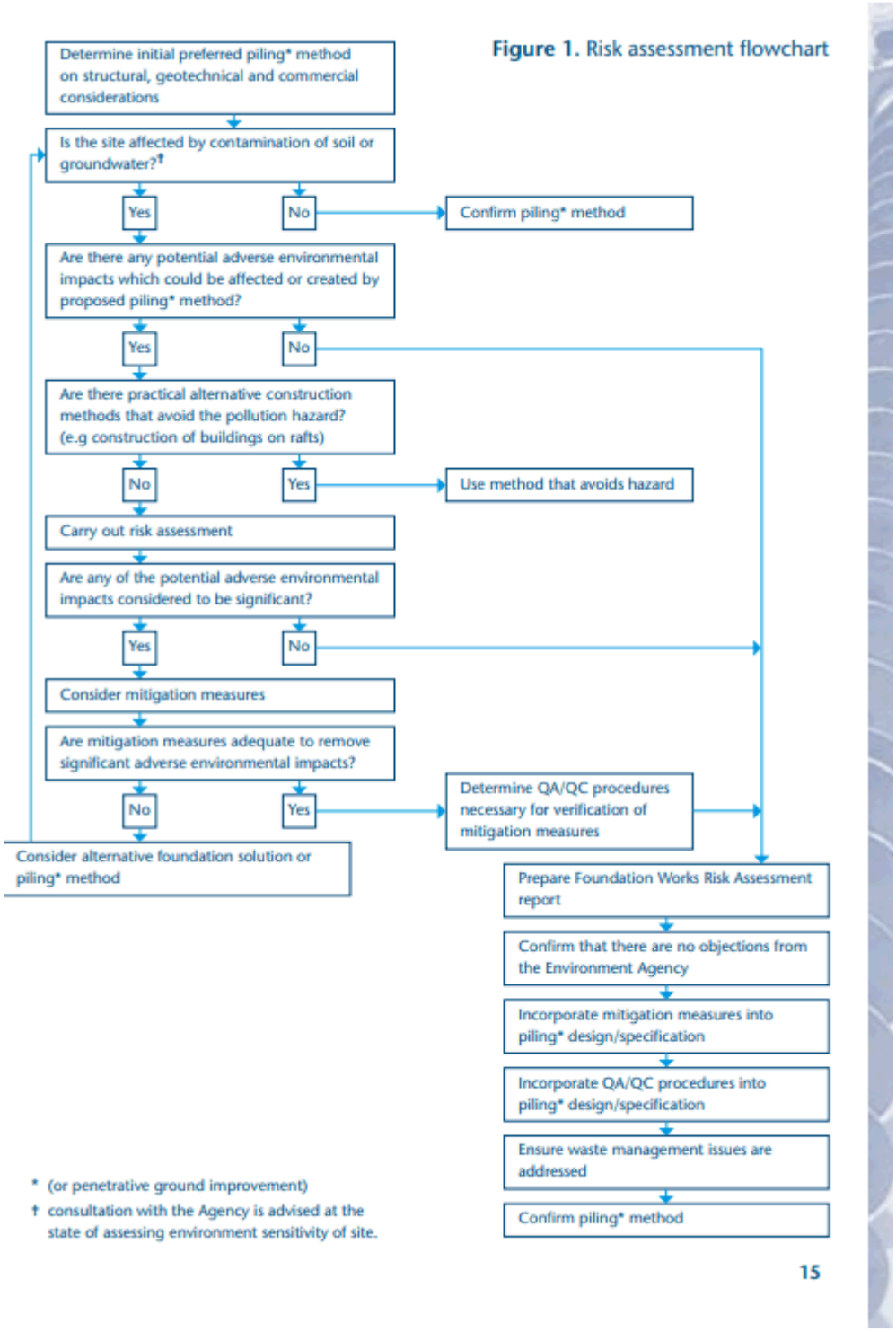
Asbri Planning Ltd | T: 02920 732652 | M: 07943 835843 | W: http://www.asbriplanning.co.uk

From: Roberts, Geraint (Principal Planning Officer) <GeraintN.Roberts@newport.gov.uk>
Sent: 10 June 2021 15:03
To: Liam Griffiths <LiamG@asbriplanning.co.uk>
Subject: RE: 20.1242 - Land To South Of Glan Usk Primary School Herbert Road - Remedial Strategy

Hello Liam

I've had a quick think about this and I suspect I won't be able to go along with you in terms of what I have so far.

I think we will need you to tick thorough the following process:



See 'Piling into contaminated sites': [3577 Piling reprt A/W (neilfoundations.co.uk)]

If we can go through the risk assessment and show low / no risk to ground and surface waters and public health then fine. But in the first instance you might need to look at another foundation type (raft) and tell us why you can't do that?

If flight auger piling is the only answer then we need some assurance on how pollution pathways either won't be opened up or won't matter if they are.

Otherwise I would need to refuse the application on the basis environmental and health risks on a site known to be contaminated have not been adequately addressed. Let me know what you are minded to do by Tuesday 15.06.2021. If I don't hear from you by then (at least with a provisional response) I will write up the report on what I have and submit it for consideration under delegated powers.

From: Liam Griffiths <LiamG@asbriplanning.co.uk>
Sent: 01 June 2021 10:30
To: Roberts, Geraint (Principal Planning Officer) <GeraintN.Roberts@newport.gov.uk>
Cc: Emma Harding <emma@asbriplanning.co.uk>; thomas.james@engie.com
Subject: RE: 20.1242 - Land To South Of Glan Usk Primary School Herbert Road - Remedial Strategy

Morning Geraint,

Hope you had a good weekend.

Further to the below email I've had the following comments passed onto me by the contractor:

Piling
The piling foundation solution was dictated by the ground conditions being partly made ground combined with the unlaying peat layers which didn't see another foundation solution being accepted by NHBC/BC. The method of piling wasn't dictated by ourselves as its more costly and time consuming method compared to driven piles. Bored piles was solely led by Welsh water following an extensive investigation prior to the sale of the land where they would not accept another means of piling above their main line trunk sewer which is situated approx. 20m below the properties. If this method wasn't applied the land would become redundant due to it being undevelopable. The level of commination is going to be minimal for the following reasons:

1. 2009 the ground was remediated and clean soils cover the top 600mm. Vinci report available via planning portal
2. The contamination is within a 2000mm zone therefore any piles going through this zone are going to a depth of 14m so the arising would be considerable diluted
3. The Piling contractor has provided a compliant set of RAM which reduces the risk of any close contact with any operatives.
4. The activities are predominately led by plant machinery with minimal labour force from an operative at source.
5. All raising segregated on polyethene sheet

The exercise in hand is considerably less risky compared to over activities which see operative working within the 2000mm contamination zone when they are lay main-line drainage to support the developments infrastructure. The RAM presented for these activities have all been signed off and satisfied.

I must stress the method of piling is not led by Engie it is a Welsh Water condition.

Please let us know if you require any further informaiton?

Thanks,

Liam Griffiths – Planner

Asbri Planning Ltd | T: 02920 732652 | M: 07943 835843 | W: http://www.asbriplanning.co.uk

From: Roberts, Geraint (Principal Planning Officer) <GeraintN.Roberts@newport.gov.uk>
Sent: 26 May 2021 16:57
To: Liam Griffiths <LiamG@asbriplanning.co.uk>
Subject: RE: 20.1242 - Land To South Of Glan Usk Primary School Herbert Road - Remedial Strategy

Hello Liam

I've looked at the Method & Risk Assessments you provided for the Flight Auger Piling and the ground beams but it's not immediately apparent to me how this information addresses the concerns of CNC/NRW.

Their objection is based in the opening up of preferential pathways for contaminated water to move through the soil profile – since large deep holes are required to drop the piles into before the concrete is poured.

Percussive / displacement piling doesn't run that risk but might be unacceptable for bio-diversity reasons this close to the river (shad migration for example).

If I go back to CNC/NRW how does the new information show the risk they have identified is successfully mitigated?

From: Liam Griffiths <LiamG@asbriplanning.co.uk>
Sent: 18 May 2021 10:19
To: Roberts, Geraint (Principal Planning Officer) <GeraintN.Roberts@newport.gov.uk>
Cc: thomas.james@engie.com; Emma Harding <emma@asbriplanning.co.uk>
Subject: RE: 20.1242 - Land To South Of Glan Usk Primary School Herbert Road - Remedial Strategy

Hi Geraint,

Further to the below could you confirm that the additional information we've provided has been issued for NRW to provide additional comment on?

Subject to receipt of no objection from NRW I assume you would be in a position to recommend positive approval of the application?

Thanks,

Liam Griffiths – Planner

Asbri Planning Ltd | T: 02920 732652 | M: 07943 835843 | W: http://www.asbriplanning.co.uk

From: Roberts, Geraint (Principal Planning Officer) <GeraintN.Roberts@newport.gov.uk>
Sent: 10 May 2021 14:52
To: Liam Griffiths <LiamG@asbriplanning.co.uk>
Subject: 20.1242 - Land To South Of Glan Usk Primary School Herbert Road - Remedial Strategy
Importance: High

Thanks Liam

Not sure what's happened with this – the emails have two numbers but the additional information isn't on either file that I can see.

Also I have cited the wrong number below which wouldn't have helped.

I will get the information on the correct file.

The objection is based in contamination risk although I note in the past we have preferred flight auger piling near the river to avoid disturbance to the shad when they are migrating (up until 30 June).

It would appear that the ground contamination issues run against the bio-diversity interests – do you know what the piling programme is likely to be – after 30.06.2021 there is no reason why it should not be percussive piling?

From: Liam Griffiths <LiamG@asbriplanning.co.uk>
Sent: 23 February 2021 09:19
To: Roberts, Geraint (Principal Planning Officer) <GeraintN.Roberts@newport.gov.uk>
Cc: Emma Harding <emma@asbriplanning.co.uk>; thomas.james@engie.com
Subject: RE: 21/0048 - Land To South Of Glan Usk Primary School Herbert Road - Remedial Strategy

Hi Geraint,

Further to receipt of the comments from NRW please see attached additional information addressing their concerns.

To confirm will you reconsult with NRW / how long will they have to recomment?

Should you have any queries please do not hesitate to contact me.

Thanks,

Liam Griffiths – Planner

Asbri Planning Ltd | T: 02920 732652 | M: 07943 835843 | W: http://www.asbriplanning.co.uk

From: Roberts, Geraint (Principal Planning Officer) <GeraintN.Roberts@newport.gov.uk>
Sent: 16 February 2021 15:06
To: Liam Griffiths <LiamG@asbriplanning.co.uk>
Subject: RE: 21/0048 - Land To South Of Glan Usk Primary School Herbert Road - Remedial Strategy

Hello Liam

21/1242 – see attached consultation response. If you wish to comment please do so by 23.02.2021 in the first instance.

I'll get back to you on 21/0048.

From: Liam Griffiths <LiamG@asbriplanning.co.uk>
Sent: 16 February 2021 09:33
To: Roberts, Geraint (Principal Planning Officer) <GeraintN.Roberts@newport.gov.uk>
Cc: Emma Harding <emma@asbriplanning.co.uk>; thomas.james@engie.com
Subject: RE: 21/0048 - Land To South Of Glan Usk Primary School Herbert Road - Remedial Strategy

Morning Geraint,

Hope you are well.

Please could you advise on the below queries in relation to apps:

- 21/0048 – I've seen Steve has confirmed he's supportive of this as such assume you can provide a positive recommendation?
- 21/1242 – are you still awaiting consultee responses?

Should you have any queries please do not hesitate to contact me.

Thanks,

Liam Griffiths – Planner

Asbri Planning Ltd | T: 02920 732652 | M: 07943 835843 | W: http://www.asbriplanning.co.uk

From: Liam Griffiths
Sent: 08 February 2021 11:17
To: 'GeraintN.Roberts@newport.gov.uk' <GeraintN.Roberts@newport.gov.uk>
Cc: Emma Harding <emma@asbriplanning.co.uk>; 'thomas.james@engie.com' <thomas.james@engie.com>
Subject: RE: 21/0048 - Land To South Of Glan Usk Primary School Herbert Road - Remedial Strategy

Hi Geraint,

Please could you provide an update on the below query?

Please could you also update on 20/1242 condition 6 updated piling?

Should you have any queries please do not hesitate to contact me.

Thanks,

Liam Griffiths – Planner

Asbri Planning Ltd | T: 02920 732652 | M: 07943 835843 | W: http://www.asbriplanning.co.uk

From: Liam Griffiths
Sent: 28 January 2021 17:08
To: 'GeraintN.Roberts@newport.gov.uk' <GeraintN.Roberts@newport.gov.uk>
Cc: Emma Harding <emma@asbriplanning.co.uk>; 'thomas.james@engie.com' <thomas.james@engie.com>
Subject: 21/0048 - Land To South Of Glan Usk Primary School Herbert Road - Remedial Strategy

Hi Geraint,

With regard to the above referenced discharge of condition application to update the remedial strategy I notice online that the EHO is supportive of the information submitted subject to:

'Details and samples of the “deter to dig” and anti-dig materials being used must be provided to the LPA prior to use, and all verification of these works must include extensive photographs and survey work showing emplacement.'

In terms of the verification details these I understand these will be submitted under condition 16 as per standard verification reports being produced by the geo-technical consultant.

With regard to *'Details and samples of the “deter to dig” and anti-dig materials being used must be provided to the LPA prior to use'* How is it anticipated that we will provide these details?

Subject to the above I assume you will be in a position to provide a positive recommendation for the application?

Thanks,

Liam Griffiths – Planner

Asbri Planning Ltd | T: 02920 732652 | M: 07943 835843 | W: http://www.asbriplanning.co.uk

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