

**From:** Andrew Williams  
**Sent:** 02 May 2014 17:36  
**To:** Geraint Nicholas Roberts  
**Subject:** 13/1279

Application Ref:13/1279  
Application Type: Full+Env Statement  
Case Officer: Geraint N Roberts  
Main Location: Land To South Of Glan Usk Primary School, Herbert Road, Newport  
Application Description: DEVELOPMENT OF 249 DWELLINGS AND ASSOCIATED WORKS INCLUDING BOUNDARY TREATMENTS, RETAINING WALLS, VEHICULAR ACCESS, PARKING, PATHWAYS AND LANDSCAPING AFFECTING PUBLIC RIGHT OF WAY 407/1

### **Contaminated Land & Air Quality**

Good afternoon Geraint

Since providing my last comments in January I have had a lot of discussion with the developers and their consultants regarding the consideration of ground conditions at the site. In light of the outcomes of these discussions I would be grateful if you could consider these comments as superseding any earlier comments I have made.

I will avoid repeating my considerations from my earlier appraisal of the various documents assessing ground conditions at the site. These considerations remain valid and have helped inform the revised remediation strategy which has been provided by the applicants consultants Terra Firma.

Some further site assessment has been undertaken since my original comments. Terra Firma have conducted another round of ground water monitoring which I suggested was required to assess the potential impact from the discharge of band drains once installed. This potential contaminant pathway has not been considered previously within the conceptual model for the site. Two rounds of monitoring has shown that the groundwater analysed is largely free of contaminants. This is reassuring to some degree.

I have also previously raised concerns regarding the presence of asbestos material identified in previous site investigations and the potential for this to be mobilised within dust during earth works. The consultants have since told me that there is no proposal to 're-work' existing material which is a common practice on brownfield sites to remove underground obstructions and consolidate material. Much of the asbestos identified is at depth and will therefore not be disturbed during construction works. The existing buried asbestos containing material will therefore be capped by imported material before subsequent earthworks are undertaken. Any potential risk of friable asbestos being mobilised during construction is very low. Therefore I suggest dropping my original condition for asbestos boundary monitoring.

Terra Firm have therefore submitted a revised Remediation Strategy Document (version3) which includes a number of additional considerations to address my initial concerns. I am happy with the remediation proposals contained within this report and would emphasise that all recommendations within Section 3 of this report will need to be fully implemented in order to allow the future discharge of contaminated land conditions.

In addition I would be grateful if you could emphasise that the remediation measures will need to be robustly verified to demonstrate they mitigate all potential risks identified.

In light of the information provided I have revised my recommended conditions below.

### **Air Quality**

Unchanged from earlier comments;

I have raised the potential impact of this proposed development on the Caerleon Road Air Quality Management Area which is likely to be impacted by the additional traffic it will generate. The applicants have therefore engaged a consultancy to assess the level of impact to air quality within the AQMA and adjacent areas. The findings of the air quality assessment record a negligible impact on local air quality which is not predicted to result in the creation of any new Air Quality Management Areas in the vicinity. Therefore I have not further concerns relating to air quality impacts generated for the additional traffic load to the local network.

### **No part of the development hereby permitted shall be occupied until:**

b) The Remediation proposals within the remediation strategy (Terra Firma Remediation Strategy 12032/RS-V3, February 2014) are fully implemented. Following remediation a Completion/Verification Report, confirming the remediation has being carried out in accordance with the approved details, shall be submitted to, and approved in writing by, the Local Planning Authority.

c) Any additional or unforeseen contamination or potential risks to health identified during the development shall be notified to the Local Planning Authority as soon as is practicable. Additional site investigation shall be undertaken (if required by the Local Planning Authority) and suitable revision of the remediation strategy shall be submitted to and approved in writing by the Local Planning Authority. The revised strategy shall be fully implemented prior to further works continuing.

Reason: To ensure that any potential risks to human health or the wider environment which may arise as a result of potential land contamination are satisfactorily addressed.

### **Contamination – Imported Material**

Prior to import to site, soil material or aggregate used as clean fill or capping material, shall be chemically tested to demonstrate that it meets the relevant screening requirements for the proposed end use. This information shall be submitted to and approved in writing by the Local Authority. No other fill material shall be imported onto the site.

Reason: To ensure that any potential risks to human health or the wider environment which may arise as a result of potential land contamination are satisfactorily addressed.

Regards  
Andy

**Andy Williams MSc BSc (Hons) MEnvSc  
Senior Scientific Officer**

Environmental Protection  
Newport City Council  
Telford Street  
Newport  
NP19 0ES

Direct Line: 01633 851474