From: Andrew Williams
Sent: 13 January 2014 17:20
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 248 DWELLINGS AND ASSOCIATED WORKS INCLUDING BOUNDARY TREATMENTS, RETAINING WALLS, VEHICULAR ACCESS, PARKING, PATHWAYS AND LANDSCAPING AFFECTING PUBLIC RIGHT OF WAY 407/1

Hi Geraint

Contaminated Land

Apologies for the delay in providing my response. The documentation submitted to demonstrate the assessment of ground conditions is basic in my opinion, and therefore I wanted to consider it in conjunction with the more detailed investigations and quantitative risk assessments undertaken in preparation for the Glan Usk School development. In particular the area north of the reen and south of the school boundary which was the focus of remediation of the buried chemical drums. The level of site investigation and risk assessment undertaken by the applicants consultants is insufficient in this area, with only a small amount of exploratory works and sampling undertaken. This is surprising given that the Terra Firma report identifies this area as being a former landfill site, and therefore I would have expected a greater focus of investigation here. The Terra Firma report does not make reference to or consider in anyway the significant volume of additional information already obtained from this site.

However (when combined with historic assessments) I am satisfied that enough site investigation to categorize ground conditions and assess potential risk has been undertaken at this site.

Significant contamination has been recorded across the majority of the development area. A layer of made ground up to 3.5m thick has been identified, the bulk of which appears to consist of demolition waste. However the area between the reen and the school site has previously been considered a separate zone in terms of contamination. Low levels PCB contamination has been identified within the northern area in the most recent site investigation. This area was previously found to contain gross chemical contamination from buried chemical drums, many of which had collapsed and leaked into the sounding ground. To facilitate the school development it therefore underwent extensive remediation with over 800 drums and over 2000 tons of chemical impacted soil material being excavated and disposed off site, in addition to other remediation measures which included the use of a clean cap and geotextile membrane.

Curiously the site investigation works undertaken by Terra firma does not record the previous remediation undertaken at all of the exploratory positions, in particular WS2 located at just north of the reen. This may be because the position was not found to be part of the area where metal drums were located during the geophysical ground scan. However all other exploratory locations indicate the presence of at least a capping layer of 0.6m or more. It is worth noting that extensive verification of the remediation works was undertaken during 2008/09 and therefore it is unlikely that any gross contamination associated with the drum waste remains in this area.

Terra Firms have recently forwarded me a proposed Remediation Strategy (which does not appear to be submitted with this application) which I have provided feedback on. Given the history of the site, the level of information pertaining to ground conditions, and the inherent uncertainties that will always remain regardless of the level site investigation, I will be requesting that robust remediation actions are implemented.

I have two additional areas of concern which I have attempted to address by recommending conditions below. The first is the presence of friable asbestos within the made ground identified in a number of separate investigations of the area. To ensure that the risk of mobilising this material within dust during construction is mitigated I have requested that a monitoring and management plan for asbestos is produced and agreed by NCC prior to site works commencing.

The final observation I have concerns the potential use of band drains installed through the alluvium and peat layers to assist with settlement and consolidation once site levels are raised. It is unclear if this is to be employed at the site although previous assessments have assumed its use. If used there is the potential for contaminated groundwater to be moved from depth to the surface and therefore earlier reports recommended that a drainage blanket and collection lagoon were installed to allow sampling prior to licensed discharge to the River Usk. I consider this more of a NRW consideration and therefore am reluctant to offer any condition that requires band drain discharges to be managed in this way. The Terra Firma assessment of ground water has identified low level hydrocarbon contamination (from a limited amount of assessment) which was attributed to drilling rig contamination. I do not agree with this conclusion in light of earlier groundwater assessments undertaken. Therefore the applicant should be made aware of the potential for material used for land raising and capping to become impacted from contaminated groundwater which may become apparent during subsequent verification testing. The introduction of band drains may also influence the ground gas regime by providing preferential pathways for gases generated in the organic rich alluvium as well as the shallow made ground. This potential will need further consideration when developing the remediation strategy for the site.

Therefore I have tailored the conditions to reflect the information that is available and also to take into account some of the earlier findings of earlier assessments of the site. As I have reworded them I would welcome any feedback on their suitability?

Air Quality

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.

Contamination

No development, shall commence until:

a) A Remediation Strategy, including Method statement and full Risk Assessment shall be submitted to and approved in writing by the Local Planning Authority.

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

b) 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.

Asbestos Monitoring

Prior to development commencing the Environmental / Construction Management Plan (or equivalent) shall include a strategy for airborne asbestos monitoring, to include boundary monitoring locations in addition to suitable mitigation procedures in the event of airborne asbestos being recorded, and agreed to in writing by the Local Planning Authority. It should include the regular provision of monitoring data and records of mitigation actions taken (if required) to the Local Planning Authority throughout the development process.

Reason: To protect site workers and adjacent residents from exposure and potential health risks from airborne asbestos material.