

From: contaminatedland
Sent: 11 November 2021 17:37
To:
Cc: Tracey Martin
Subject: RE: Consultee letter for Planning Application: 2021/4598/P

Rav,

Based on my initial review I am concerned about this project.

This site has a considerable industrial history and hence contaminated land investigation work needs to be comprehensive.

I have looked at the previous correspondence in our job folder. The most recent seems to be in mid 2016 and relates to a supplementary site investigation report. From what I can determine, this relates to a previous phase on this site where a school was being constructed. It appears that this may have been completed in 2019. The CLO asks for a remediation strategy. I cannot find this or any subsequent documentation / correspondence thereafter.

On a project of this size and complexity, I need some background i.e. what has been done to date, what has been signed off and when etc... Therefore, the applicant should be providing a cover letter with the most recent submission providing this information and stating the objective of the most recent submission. This current report discusses previous phases of site investigation but not (at least in the early sections) remediation and verification.

Before I can review this report I need to understand what has happened in the previous phase. Was the remediation strategy produced? Was it approved by the contaminated land team? And (subsequently) was a remediation verification report produced, submitted and approved? Could you please check your records and advise me accordingly?

Has any agreement been made regarding how the condition will be addressed given the site has multiple (or at least two) distinct development phases? We can't sign off a sub-section of a condition asking for a site investigation if investigations are needed over multiple phases which will be undertaken years apart.

I'm further concerned by the quality of the recent report. Below is an example paragraph containing numerous errors. I will review it in full once I have more context on the project.

R,

Paul Adams.

The results of contamination testing revealed elevated concentrations of arsenic, lead and total PAH, including a number of individual PAH compounds, in a number of samples of made ground, whilst a TPH concentration in a single sample of made ground, recovered from Borehole No 10 was also encountered. None of the concentrations of the individual hydrocarbon chain lengths were however found to be elevated. A number of levels of total organic carbon were also A single sample of groundwater recovered from Borehole No 1 was subject to a suite of contamination testing, which revealed concentrations of dissolved arsenic, chromium and nickel to be in excess of the Drinking Water Standards. It should be noted that the assessment was based on the generic guideline values at the time, which have subsequently been updated. When compared to current guideline values, only single a single sample contained an elevated concentration of arsenic, as ingle sample contained an elevated concentration of lead and two samples contained elevated concentrations of Total PAH.