

Rowlands, Ceiri

From: Kate Gapper <kate.gapper@carneysweeney.co.uk>
Sent: 16 February 2024 15:42
To: Rowlands, Ceiri
Cc: Planning
Subject: 2023/01076/FUL - Provision of Above and Below Ground Utilities on Land at Bro Tathan, St Athan
Attachments: NRW response 4 Jan 2024.pdf; Reactive Remediation Strategy V3 January 2024.pdf; Ground Investigation Report V1 November 2023.pdf

Hi Ceiri

Following receipt of NRW's consultation response (attached) dated 4th January 2024 in connection with the above planning application, I am writing to provide some additional information in relation to the assessment of ground contamination and groundwater protection.

The response from NRW acknowledges the potential for contamination to be present on the site associated with the current and historical use of the site as a military facility. In support of the planning application the following document was submitted in relation to ground contamination.

Reactive Remediation Strategy V1 (August 2023)

This document has since been updated and has been replaced with the following document:

Preliminary Risk Assessment, Remediation and Reactive Remediation Strategy V3 (January 2024)

Additionally, since the submission of the application, ground investigation has been undertaken along the route of the proposed utilities upgrade with the results presented in the following report:

Ground Investigation Report V1 (November 2023)

This document assesses the potential for ground contamination to be present along the route of the proposed utility network as well as providing an assessment in line with the UKWIR document "Guidance for the Selection of Water Supply Pipes to be used in Brownfield Sites, (Ref 10/WM/03/21) with regards the specification for water supply pipes. The document is also intended to support the Materials Management Plan (MMP) which is currently being developed in relation to the reprofiling of the site.

The ground investigation consisted of 32 hand excavated trial pits to a maximum depth of 1.2m bgl. No visual or olfactory signs of contamination were identified during the ground investigation and subsequent laboratory testing did not identify any potential contaminants at concentrations in excess of the relevant screening criteria for the current and ongoing land use.

Both the Preliminary Risk Assessment (PRA) and Ground Investigation Report (GIR) are attached.

Recommended Condition

We note that standard conditions relating to ground contamination are recommended within NRW's response letter, however, given the nature of the proposed development and the findings of the works undertaken to date, we would suggest that a condition, which is limited to a reactive approach to assess and manage any previously unidentified contamination which may be encountered during the works, is more appropriate .

We therefore propose an alternative condition to replace the land contamination conditions put forward by NRW in their letter dated 4th January 2024 as follows:

In the event that unforeseen contamination is encountered during the works, the local planning authority and NRW must be contacted within two days. All associated works must stop and no further works must commence until a scheme to deal with the contamination has been agreed. This must include a site intrusive investigation and subsequent risk assessment and where remediation is necessary, a remediation scheme, options appraisal and verification plan must be submitted to and approved in writing by the Local Planning Authority and NRW.

You will note that the above condition mirrors closely the suggested condition by Shared Regulatory Services (SRS) in their response dated 4th December 2023 with Condition 1 'Contaminated Land Measures – Unforeseen Contamination' stating:

In the event that contamination is found at any time when carrying out the approved development that was not previously identified it must be reported in writing within 2 days to the Local Planning Authority, all associated works must stop, and no further development shall take place unless otherwise agreed in writing until a scheme to deal with the contamination found has been approved. An investigation and risk assessment must be undertaken and where remediation is necessary a remediation scheme and verification plan must be prepared and submitted to and approved in writing by the Local Planning Authority. Following completion of measures identified in the approved remediation scheme a verification report must be submitted to and approved in writing by the Local Planning Authority. The timescale for the above actions shall be agreed with the LPA within 2 weeks of the discovery of any unsuspected contamination.”

Other recommended conditions from SRS relate to the importation of soil, imported aggregates and use of site won materials. It is noted that the importation and re-use of materials will be managed in line with the MMP which has been prepared for the site and will be submitted to a Qualified Person for sign off once planning consent has been received.

I looking forward to hearing your thoughts on the above.

Kind Regards

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