

St Helens Council Environmental Health Division Planning Consultation Response - Contaminated Land Section

To: Jennifer Bolton

Date: 12th October 2020

From: Christopher Culley

Tel: 01744 676397

Planning App No: P/2020/0061/HYBR

Proposals: Hybrid Planning Application for the following development (major development); (i) Full Planning Permission for the erection of a B8 logistics warehouse, with ancillary offices, associated car parking, infrastructure and landscaping; and (ii) Outline Planning Permission for Manufacturing (B2) and Logistics (B8) development with ancillary offices and associated access infrastructure works (detailed matters of appearance, landscaping, layout and scale are reserved for subsequent approval)

Our Ref: 035887

Location: Land To The West Of Omega South & South Of The M62 Bold St Helens

Jen

Further to your consultation I have considered the contaminated land implications and would respond as follows;

The application is supported by the following documents;

- WSP, Contaminated Land Phase 1 Geo-environmental Assessment, ref 11158(002), May 2019
- WSP, Ground Investigation Report & Remediation Strategy, ref. 70062937/11482, December 2019
- WSP, Ground Gas Assessment (Addendum) 14th February 2020
- WSP, Omega Zone 8, Monitoring Well Decommissioning Strategy, 17th March 2020

The Phase 1 Geo-Environmental Assessment identified that the site has not been subject to previous development, having only ever existed as open fields with a series of ponds and drainage ditches. The vast majority of these ponds and ditches are still present with only a small number that have either silted up or been backfilled. On this basis, contamination was scoped out of the need for any specific assessment as part of the Environmental Statement. Notwithstanding this a phase 2 ground investigation has been completed in any case which covers approximately three quarters of the area making up the detailed/ full planning application area and part of the outline application area. An approximately 8 hectare

triangular area in the north west of the site proposed as a landscape/ ecology mitigation buffer zone has gone without any investigation, as has the southern half of the site. Bearing in mind the site history and the associated low contamination risk and considering the low sensitivity of the proposed end use, I do not consider further site investigation in this north western triangle to be necessary. However, in accordance with the recommendations of the phase 1 study, it would be prudent for further investigation to be completed in due course throughout the southern part of the site for which outline permission is being sought.

The Ground Gas Addendum report identified elevated carbon dioxide concentrations in some wells in addition to some extremely high flow rates on certain monitoring rounds. However, this was restricted to the sandstone at depth and induced by the drilling of the boreholes through a confining layer of low permeability Glacial Till. The development will need to be implemented in accordance with the Monitoring Well Decommissioning Strategy to ensure that any preferential migration pathways formed by the drilling of the boreholes are severed.

The submitted reports confirm the low risk posed by contamination at the site, particularly considering the low sensitivity of the proposed development. As such I have no objection to the proposals. I would however recommend a number of conditions which, for ease, I have broken down into four zones of the site with reference to the attached figure.

ZONE 1

No conditions required

ZONES 2 & 3

Prior to occupation/ commencement of use;

A verification report which confirms the successful decommissioning of boreholes in accordance with the submitted strategy (WSP, Omega Zone 8, Monitoring Well Decommissioning Strategy, 17th March 2020) shall be submitted to and agreed in writing with the Local Planning Authority.

ZONE 4

Prior to the commencement of development;

- a) A Phase 2 site investigation and assessment shall be undertaken in accordance with the recommendations of the submitted Phase 1 Geo-environmental Assessment (WSP, ref 11158(002), May 2019). The results of the site investigation and assessment shall be submitted to and agreed in writing with the local planning authority.
- b) Should the Phase 2 investigation identify any requirements for remediation then a remedial strategy, including a validation methodology, shall be submitted to and agreed in writing with the local planning authority. The remedial strategy shall include a methodology and verification plan for the decommissioning of any deep boreholes.

All such reports shall be completed by a competent person in accordance with government and Environment Agency guidance, namely "Land Contamination: Risk Management" (<https://www.gov.uk/guidance/land-contamination-how-to-manage-the-risks>).

Prior to occupation/ commencement of use of any phase of the development:

- a) The agreed remedial strategy (if required) will have been implemented, and a site validation/ completion report for each building within that phase shall be submitted to and approved in writing by the local planning authority. For the avoidance of doubt, the site validation/ completion report shall include, but will not necessarily be limited to; i) full details of all remediation works undertaken; ii) validation (in accordance with the validation methodology detailed within the agreed remedial strategy) of the adequacy of the remediation; iii) sampling, testing and assessment of the suitability of any imported or site won soils; iv) the fate of any excavated material removed from site; v) verification of the successful decommissioning of boreholes. The site validation/ completion report(s) shall be completed by a competent person in accordance with government and Environment Agency guidance, namely "Land Contamination: Risk Management" (<https://www.gov.uk/guidance/land-contamination-how-to-manage-the-risks>).

Reason for Conditions

To ensure that any contamination is treated to the satisfaction of the Local Planning Authority in accordance with the National Planning Policy Framework which states that after remediation, as a minimum, land should not be capable of being determined as contaminated land under Part IIA of the Environmental Protection Act 1990. Also in accordance with policy CP1 of the St. Helens Core Strategy (2012) and retained policy ENV26 of the St Helens Unitary Development Plan (1998).

Regards,

Christopher Culley
Contaminated Land Officer

