
From: James, Nick
Sent: 14 May 2014 09:44
To: Banks, Andrew
Cc: Boreham, Marian
Subject: RE: P141022/F- Land at Pinsley Road, Leominster- Contaminated Land Comments

Good Morning Andy,

Please see attached. For completeness, I've also included some correspondence from 2012 which I had with the consultants about the site.

Kind regards

Nick



ALR10046 Pinsley
Mill.doc



P1 Pinsley Mill
121012.pdf

**TO: ENVIRONMENTAL HEALTH AND TRADING STANDARDS
FROM: DEVELOPMENT MANAGEMENT- PLANNING AND
TRANSPORTATION**



APPLICATION NO: P141022/F
DESCRIPTION: Proposed demolition of existing building and erection of 29 dwellings with associated private drive, landscaping and external works.
SITE: Land at, Pinsley Road, Leominster, Herefordshire, HR6 8NN
APPLICATION TYPE: Planning Permission
PARISH: Leominster
GRID REF: OS 350091, 259085
CASE OFFICER: Mr A Banks
WEBSITE: <http://www.herefordshire.gov.uk/searchplanningapplications>

I have received the above application on which I would be grateful for your advice.

The application form and plans for the above development can be viewed on the Internet, normally within 24 hours, using the link above:

I would be grateful for your advice in respect of the following specific matters: -

	Air Quality	Minerals and Waste
x	Contaminated Land	Petroleum/Explosives
	Landfill	Gypsies and Travellers
	Noise	Lighting
	Other nuisances	Water Supply
	Licensing Issues	Foul Drainage
	Industrial Pollution	Biomass Boilers
	Additional Info	Amended Plans

Please can you respond by 30/04/2014 to abanks@herefordshire.gov.uk

Comments

I refer to the above application and would make the following comments in relation to contaminated land issues only.

The application has been submitted with the following reports which consider potential contamination at the site:

Phase 1 Desk Study. Signature Homes and Construction Limited. Proposed Residential Development at Pinsley Mill, Pinsley Road, Leominster. Prepared by Environmental Management Solutions (EMS) dated September 2012. Ref: EMS3512

And

Intrusive Ground Investigation Report. Proposed Residential Development at Pinsley Mill, Pinsley Road, Leominster. Prepared by EMS dated November 2012. ref: EMS3512GI.

I have previously provided comments to EMS on the desk study and these were reflected within the subsequent Ground Investigation Report. With this in mind, the following comments will focus more on the latter:

- The reports pre-date the arson attack of September 2013 (supporting design and access statement) and subsequent demolition of the Mill. Because of this I would recommend some supplementary and confirmatory investigation be carried out to

provide reassurance that no contamination was mobilised as a result of this. Asbestos, in particular, should form part of this assessment.

- The additional assessment should also consider the method of fire suppression and retardant used.
- I would also ask that confirmation be provided to demonstrate that all asbestos containing material identified on site were suitably removed, as recommended in the report.
- Because the ground investigation was carried out at a time when the buildings were somewhat inaccessible due to being in a dangerous condition, there remains some uncertainty regarding the state of the ground beneath both the mill building and others within the site area. As such, further investigation should be carried out to address this uncertainty.
- Consideration should also be given to the installation of vapour protection membranes in areas where hydrocarbon odours were identified.
- Suitable validation documentation will be required in due course to demonstrate gas protection measures have been installed as recommended for part of the site.

With the above in mind, I would recommend the following condition be appended to any planning approval although it is accepted that much of the required work has been carried out already;

1. No development shall take place until the following has been submitted to and approved in writing by the local planning authority:
 - a) a 'desk study' report including previous site and adjacent site uses, potential contaminants arising from those uses, possible sources, pathways, and receptors, a conceptual model and a risk assessment in accordance with current best practice
 - b) if the risk assessment in (a) confirms the possibility of a significant pollutant linkage(s), a site investigation should be undertaken to characterise fully the nature and extent and severity of contamination, incorporating a conceptual model of all the potential pollutant linkages and an assessment of risk to identified receptors
 - c) if the risk assessment in (b) identifies unacceptable risk(s) a detailed scheme specifying remedial works and measures necessary to avoid risk from contaminants/or gases when the site is developed. The Remediation Scheme shall include consideration of and proposals to deal with situations where, during works on site, contamination is encountered which has not previously been identified. Any further contamination encountered shall be fully assessed and an appropriate remediation scheme submitted to the local planning authority for written approval.

Reason: In the interests of human health and to ensure that the proposed development will not cause pollution to controlled waters or the wider environment.

2. The Remediation Scheme, as approved pursuant to condition no. (1) above, shall be fully implemented before the development is first occupied. On completion of the remediation scheme the developer shall provide a validation report to confirm that all works were completed in accordance with the agreed details, which must be submitted before the development is first occupied. Any variation to the scheme

including the validation reporting shall be agreed in writing with the Local Planning Authority in advance of works being undertaken.

Reason: In the interests of human health and to ensure that the proposed development will not cause pollution to controlled waters or the wider environment.

3. If, during development, contamination not previously identified is found to be present at the site then no further development (unless otherwise agreed in writing with the local planning authority) shall be carried out until the developer has submitted, and obtained written approval from the local planning authority for, an amendment to the Method Statement detailing how this unsuspected contamination shall be dealt with.

Reason: In the interests of human health and to ensure that the proposed development will not cause pollution to controlled waters or the wider environment.

Technical notes about the condition

1. I would also mention that the assessment is required to be undertaken in accordance with good practice guidance and needs to be carried out by a suitably competent person as defined within the National Planning Policy Framework 2012.
2. And as a final technical point, we require all investigations of potentially contaminated sites to undertake asbestos sampling and analysis as a matter of routine and this should be included with any submission.

Signed: N James
Date: 14th May 2014

Public Health Directorate

Director: Jo Davidson

James Woodier
Geo-Environmental Engineer
Environmental Management Solutions Ltd. (EMS)
Sigeric Business Park,
Holme Lacy Road,
Rotherwas.
HR2 6BQ

Your Ref: EMS3512
Our Ref: NJ/MBP1/Pinsley Mill
Please ask for: Nick James
Direct Line / Extension: 01432 261684
Fax: 01432 261982
E-mail: njames@herefordshire.gov.uk

12th October, 2012

Dear James,

PHASE 1 DESK STUDY, PROPOSED RESIDENTIAL DEVELOPMENT AT PINSLEY MILL, PINSLEY ROAD, LEOMINSTER. HR6 8NN. CARRIED OUT BY ENVIRONMENTAL MANAGEMENT SOLUTIONS LTD. (EMS) DATED SEPTEMBER 2012, REF: EMS3512.

The above report has identified a potential risk to future residents from the former use of the site and has recommended further investigation be undertaken to more fully assess any contamination. I look forward to receiving the results in due course and in the interim I would provide the following comments:

1. The report has identified the potential presence of a gas plant and gas engine at the mill site. As such I would advise that there will need to be a high degree of confidence in the assessment to reasonably demonstrate that the site has been suitably investigated to locate the gas plant. However, it is also recognised that the location of the plant may not be on the proposed site of the development.
2. A number of potentially contaminative uses have been undertaken at the site with some more significant than others. The next phase of works may offer the opportunity to consider zoning on the basis of former use in order to prioritise areas of the site in terms of number of samples and suites of analysis.
3. Proposed site layouts are assumed to be unknown at this stage. If available prior to intrusive investigation these would be useful in contributing to the rationale for trial pitting when used in combination with the targeted approach proposed for the investigation.
4. The report has obtained or attempted to obtain information from a number of sources in addition to those provided by the commercial search provider. However, it does not appear to have included a search of Local Authority planning files. Given the number and variety of uses undertaken at this site, it would be useful if these were considered prior to intrusive investigation as they may contain information which can help target the investigation and reduce uncertainty in the conceptual site model.

Should you require clarification or further information regarding the points raised please contact me on the above number.



Working in partnership for the people of Herefordshire
Herefordshire Council, PO Box 233, Hereford HR1 2ZF

Herefordshire Council Main Switchboard (01432) 260000, www.herefordshire.gov.uk
NHS Herefordshire Main Switchboard (01432) 344344, www.herefordshire.nhs.uk

Yours sincerely,

NICK JAMES
SENIOR TECHNICAL OFFICER (AIR, LAND AND WATER)
ENVIRONMENTAL HEALTH & TRADING STANDARDS