


I N T E R	<h1>MEMO</h1>	
O F F I C E		

To: Leanne Pogson-Wray, Development Management

From: Environmental Health (Commercial)

Your Ref: PA/2018/1768

Our Ref: PLU 003978

Subject: Planning permission for part demolition, refurbishment and extension of existing buildings for use as B2 (General Industrial) with ancillary B8 (Storage and Distribution), B1a (Offices) and vehicle showroom, together with landscaping, car parking, access and ancillary works, remediation and reprofiling of land (including removal of bunds).

Location: Belton Business Park, Epworth Road, Belton DN9 1NY.

Date: 05 November18

I note the above application and confirm this department has the following comments to make.

**Contaminated Land**

I can confirm this department has received and reviewed the following reports submitted in support of the application.

- IGE Consulting Phase 1 Geo-Environmental Investigation for Land at Former Belton Business Park Dated June 2018 Report Ref 3124-01
- IGE Consulting Geo-Environmental Ground Investigation for Land at former Belton Business Park Dated September 2018 Report Ref 3124-02
- IGE Consulting Remediation Method Statement for Land at former Belton Business Park Dated September 2018 Report Ref 3124-03

**Summary**

The site investigation has not identified widespread contamination on site. Asbestos containing materials were identified in a single sample taken from the western bund. As part of the development it is proposed that where possible the bund materials will be used in alteration of site levels. The remediation method statement puts forward proposals for further assessment of the bund material to assess its suitability for use. A number of proposals have been put forward for the management of the bund

material for re-use, which depend on the results of the further sampling. This department finds the proposals acceptable in principle. The final method statement and the results of the further testing should be provided to this department prior to the commencement of ground works on site.

Therefore, considering the above this department would recommend the following condition should the application be approved.

*Unless otherwise agreed by the Local Planning Authority no development shall commence other than Phase One works as detailed in the Crowstone Phase Works Schedule dated 29 October 2018 until parts 2 to 4 below have been complied with. If unexpected contamination is found after development has begun, development must be halted on that part of the site affected by the unexpected contamination to the extent specified by the Local Planning authority in writing until part 4 has been complied with in relation to that contamination.*

### **Part 2: Submission of Remediation Scheme**

*A detailed remediation scheme to bring the site to a condition suitable for the intended use by removing unacceptable risks to human health, buildings and other property and the natural and historical environment must be prepared, and is subject to the approval in writing of the Local Planning Authority. The scheme must include all works to be undertaken, proposed remediation objectives and remediation criteria, timetable of works and site management procedures. The scheme must ensure that the site will not qualify as contaminated land under Part 2A of the Environmental Protection Act 1990 in relation to the intended use of the land after remediation.*

### **Part 3: Implementation of Approved Remediation Scheme**

*The approved remediation scheme must be carried out in accordance with its terms prior to the commencement of development other than that required to carry out remediation, unless otherwise agreed in writing by the Local Planning Authority. The Local Planning Authority must be given two weeks written notification of commencement of the remediation scheme works.*

*Following completion of measures identified in the approved remediation scheme, a verification report (referred to in PPS23 as a validation report) that demonstrates the effectiveness of the remediation carried out must be produced, and is subject to the approval in writing of the Local Planning Authority.*

### **Part 4: Reporting of Unexpected Contamination**

*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 immediately to the Local Planning Authority. An investigation and risk assessment must be undertaken in accordance with the requirements of Part 1, and where remediation is necessary a remediation scheme must be prepared*

*in accordance with the requirements of Part 2, which is subject to the approval in writing of the Local Planning Authority. Following completion of measures identified in the approved remediation scheme a verification report must be prepared, which is subject to the approval in writing of the Local Planning Authority in accordance with Part 3.*

Further detailed comments can be found below.

### Desk Study

The development site is a 12.5 Ha site located within the Belton Business Park and comprises of a large industrial masonry and portal frame building and associated hard standing. Present on site are two large bunds and a lake. Included in the development site to the east is 'expansion land', which currently comprises of agricultural fields.

The site has historically been used as a brick works with an associated quarry. By 1993 the quarry has been partially infilled with a refuse heap, of which a small part encroaches onto the development site. Following the cessation of the brick works the site was used for the manufacture of dog biscuits until its closure in 2014.

During the sites use as a dog biscuit manufacturer the illegal burial of wastes took place, the total volumes of waste onsite are unknown but included the disposal of 18 tonnes of dog biscuits.

The desk study identified potential sources of contamination associated with the sites historical uses including asbestos, TPH, PAH's from the former brick works, and hazardous ground gases from the onsite landfill, made ground and the illegal deposit of organic wastes.

The site conceptual model and preliminary risk assessment has classified the risk to human health as low to moderate and recommends an intrusive site investigation be undertaken. Risk from hazardous ground gases associated from the onsite landfill and illegal waste deposits were considered as high and ground gas monitoring should be undertaken.

Proposals for site investigation were agreed by this department prior to the site investigation taking place.

### Site Investigation

The site investigation consisted of 9 No. window sample boreholes, 13 No. trial pits and 5 No. stockpile trial pits. 6 No. ground gas and ground water monitoring wells were also installed.

Ground conditions identified were highly variable, however generally the typical ground conditions were identified as made ground comprising of concrete, tarmacadam or grassed topsoil to depths between 0.05 and 0.20m bgl over highly variable made ground comprising of gradual or cohesive deposits to depths between 0.55, and at least 3.50 bgl. Weathered mudstone was found to underlay the site.

The western bund was found to comprise mainly of made ground consisting of firm to stiff grey clays and brown gravelly clayey sand. Of note is the presence of plastic bags filled with decomposing dog biscuits between 0.40 and 2.00mg/l identified in TP8 underneath the western bund. The eastern bund was found to comprise clays and gravels.

Visual evidence of ash and a slight hydrocarbon odour was identified in TP02 at depths between 1.6-3.3mbgl, a slight hydrocarbon odour was also identified in TP03 between 2.7-3.5mbgl and TP05 between 0.05-0.8mbgl and within the perched water in TP08. An organic odour associated with the degrading dog biscuits was noted in TP08.

### Chemical Testing

A total of 15 soil samples were collected and underwent chemical analysis for a range of contaminants including metals, TPH, PAH's and asbestos. No elevated concentrations were identified above the Generic Assessment Criteria (GAC) for commercial end use.

Asbestos was detected in a sample from STP-D taken from the western bund. A 765g sand and gravel sample was found to contain 5.707% asbestos containing materials (ACM's). The ACM was identified as a chrysotile asbestos cement fragment. No free fibres were identified in the sample.

### Ground Gas

Six No. gas monitoring wells, were installed to assess ground gas risk from the adjacent former landfill and the buried organic wastes identified. Four rounds of gas monitoring were undertaken. No concentrations of methane were detected during the monitoring. A maximum concentration of carbon monoxide of 1.7%v/v was identified with no steady positive flow were recorded. A worst case Gas Screening Value of 0.0017l/hr was calculated which would designate the site as Characteristic Situation 1 (CS1). It is therefore considered no gas protection measures are required.

### Risk Assessment

While some visual and olfactory evidence of contamination was identified, no elevated concentrations above the assessment criteria were recorded. Chrysotile asbestos cement was identified in a sample taken from the western bund. While no free fibres have been identified, their presence cannot be discounted, potential risk from asbestos fibres should therefore be considered.

There is a requirement to alter site levels, and there is an intention to reuse the bund material on site. As it is proposed to hardcover the site as part of the development the risk to the proposed end user is considered low. However, the presence of asbestos within the made ground poses a potential risk to ground workers during the development, and will require the safe removal of ACMs prior to the reuse of the bund material onsite.

While the dog biscuits buried on site do not pose a risk to health, they are geotechnically unstable and will require removing from site to a licenced waste facility.

## Remediation

A remediation strategy has been put forward to address the ACM's and buried dog biscuits identified during the site investigation. Outline proposals for remediation are the following.

- Removal of surface ACMs suspected in the site walkover
- The removal of the dog biscuit deposits
- The removal or processing and placement of the 2 No. large bunds in the southern site section totalling approximately 3400m<sup>3</sup>.

### Removal of surface ACM's

Surface ACM's on the south side of the main warehouse building and in a grassed area in close vicinity to the large bunds have been identified. The report states that the suspected ACM's should be removed prior to any site works commencing. The remediation report provides a method for their removal that this department finds acceptable.

### Bund Materials

As part of the development alteration of existing site levels will be required. If possible, it is proposed to re-use the bund materials should they be found suitable.

Laboratory testing of 4 No. samples from the bunds have been undertaken. An ACM has been found in a single sample. The ACM was identified as chrysotile asbestos cement. No free asbestos fibres were identified. At this time, it is unknown whether the bunds contain any further asbestos materials.

In order to establish whether further ACMs are contained within the material further assessment must be undertaken. Sampling is proposed at rates of 1 sample per 100m<sup>3</sup> of material in accordance with the YALPAG document verification requirements for cover systems. It is therefore proposed to take 9 No Samples from the western bund and 27 samples from the eastern bund.

Remediation methods for the bund materials has been put forward for each of the following scenarios.

- No further asbestos fibres found.
- More ACM fragments are encountered at sporadic/random frequency in very low quantities (<0.001 to 0.01 %wt/wt).
- Free/dispersed fibres and fibre bundles are encountered.

The proposals put forward have been compiled using the JIWG Decision Support Tool for the Categorisation of Work Activities Involving Asbestos in Soil or Construction & Demolition Materials in accordance with CAR 2012 (FINAL Version 2.1, March 2017).

This department find the method statement for the assessment and management for the bund material acceptable. Following testing of material the final proposals should be submitted for approval.

## Buried Wastes

Buried dogs biscuits were encountered in TP08, it is also suspected that the remainder of the 18 tonnes buried on site are located under the bund. As part of groundworks, it is proposed that the extent of the dogs biscuits will be determined and be excavated for removal to a licensed facility.

## Noise

- Miller Goodall Ltd, Noise Assessment on behalf of Cartwright Properties Ltd for Belton Business Park, Epworth Road, Belton, Doncaster. Report ref: 101881. Date 8 August 2018.

This department has reviewed the above report and has the following comments to make:

The former use of the site is industrial. The proposed development comprises the part demolition, refurbishment and extension of existing buildings for use as B2 (General Industrial) with ancillary B8 (Storage and Distribution), B1a (offices) and vehicle showroom, together with landscaping, car parking (245 spaces), access and ancillary works, remediation and reprofiling of land (including removal of bunds).

The proposed development is located in a mainly rural area with the closest residential properties located approximately 200m north west of the site and Belton village 250m to the north.

Proposed hours of use are 07:30 hrs until 17:30hrs Monday to Friday with occasional operations to 19:30 hrs and occasional weekend operations.

Noisy operations at the site are undertaken internally and involve drilling, hammering and cutting of metal, along with the spray painting of vehicles. The majority of which involve the use of hand tools.

Source noise measurements of activities within the existing Cartwright Conversions factory were taken for use in this noise assessment.

Guidance requires that noise from the proposed use is compared to existing background to assess the impact. Noise monitoring was undertaken in one location to the south west of the proposed site, 30 metres from Epworth Road in order to determine ambient noise levels to which the residential properties would be subject to. However, the residential property identified by the report to be at most risk from noise disturbance is approximately 100 metres from the road, therefore ambient noise levels at this location are likely to be quieter than those monitored. This department considers that the chosen monitoring location is not therefore representative of the residential properties.

In order to predict noise levels at residential properties, information has been input into CadnaA system. The results find there will be no adverse impact on local residents. The input data has not been provided in full to this department and therefore we are not in a position to review the findings.

However, all noisy activities are to be undertaken inside the buildings during the daytime hours and this department considers that any negative impacts can be controlled by condition. This department therefore recommends the inclusion of the following conditions should planning permission be granted:

- **No working activities are to be undertaken on site outside of the following hours:**

**07:30 – 19:30 hours Monday to Friday**

**08:00 – 13:00 hours Saturday**

- **No power or other tools which have the potential to cause a noise disturbance will be used in the outside areas of the site**
- **All doors on the north side of the buildings shall remain closed except for access and egress**
- **No plant for extraction, ventilation, air conditioning be installed until the details have been submitted to and approved in writing by the local planning authority. The details shall include an assessment of likely impact of the plant on residential amenity, specifying noise output and any mitigation measures necessary. All plant shall be installed and maintained in accordance with the details approved by the local planning authority.**
- **At no time shall open storage take place on site.**
- **In addition to the above, we are unsure whether general storage permission B8 would also permit the future storage of waste such as Refuse Derived Fuel (RDF) and the Council must protect against this possibility by seeking to limit this.**

**We would therefore recommend the inclusion of the following condition:**

- **No Refuse Derived Fuel shall be brought on to or stored on site at any time unless otherwise agreed in writing by the local planning authority.**

Reason: In the interest of protecting the amenity of neighbouring properties in accordance with policy DS1 of the North Lincolnshire Local Plan

### **Air Quality**

I can confirm this department has received the following reports submitted in support of the application.

- **Cartwright Conversions Belton Air Quality Assessment, Written by WYG, Reference A109528 and Dated August 2018**

Having reviewed the report this department has the following comments to make.

### **Construction Phase**

The report assess the impact of the construction phase of the proposed development site on nearby sensitive receptors. Furthermore the report proposes that with adequate mitigation measures the risks from development of this site can be adequately controlled to ensure residential amenity is protected.

This department is satisfied that the measures outlined in Section 7, Table 7.1 are adequate and therefore recommend the inclusion of the following conditions should planning permission be granted:

- **The mitigation measures described in Section 7, Table 7.1 of the Air Quality Impact Assessment Reference A109528 dated August 2018, shall be implemented in full for the duration of the proposed demolition and construction works.**
  
- **Construction, demolition and site clearance operations shall be limited to the following days and hours:**
  - **07:00 to 19:00hrs Monday to Friday.**
  - **07:00 to 13:00hrs Saturday.**
  - **No construction, demolition or site clearance operations on Sundays or public holidays.**
  - **HGV movements shall not be permitted outside these hours during the construction phase without prior written approval from the Local Planning Authority.**
  - **Installation of equipment on site shall not be permitted outside these hours without prior written approval from the Local Planning Authority.**

Reason: To protect residential amenity

### **Operational Phase**

The report uses dispersion modelling, monitoring results and DEFRA background maps to determine the impact the proposed development will have on existing air quality. The report considers the impact of PM10, PM2.5 and N02 at the nearest sensitive receptors. The report concludes that the overall significance of potential impacts is *negligible* based on the assessment criteria produced by EPUK and IAQM dated January 2017.

Although this department would agree with the reports conclusion, the National Planning Policy Framework (NPPF Para 35) advises that developments should be located and designed where practical to enable future occupiers to make green vehicle

choices and incorporate facilities for charging plug-in and other ultra-low emission vehicles. To prepare for increased demand in future years, appropriate cable provision should be included in the development.

This application is for commercial use including B2, B8 and B1a on land covering approximately 11.3 hectares with 245 proposed parking spaces. This fulfils the Stage 1 Criteria in Table 6.1 of the Institute of Air Quality Management Land Use Planning and Development Control: Planning for Air Quality January 2017 as the application involves more than 1,000 m<sup>2</sup> of floor space for all other uses, has a site area greater than 1ha and the development has more than 10 parking spaces.

This department would recommend that the development includes provision for Electric Vehicle Charging Points in order to address the advice in para 35 of the NPPF as set out above. This approach is also in accordance with the IAQM good practice guidance and will assist towards sustainable development. The scheme should take account of the above guidance and contemporaneous electrical standards.

This department therefore recommend the inclusion of the following condition should planning permission be granted:

**A scheme for the provision of Electrical Vehicle Charging Points shall be submitted to and approved in writing by the local planning authority. The scheme shall be designed to take account of good practice guidance as set out in the Institute of Air Quality Management Land Use Planning and Development Control <http://www.iaqm.co.uk/text/guidance/air-quality-planning-guidance.pdf> and contemporaneous electrical standards including**

- **Electrical Requirements of BS7671:2008**
- **IET Code of Practice on Electrical Vehicle Charging Equipment installation 2012 ISBN 978-1-84919-515-7**

**The approved scheme shall be installed prior to commencement of the use hereby permitted in full and retained in perpetuity thereafter.**



Reason: To facilitate the uptake of low emission vehicles and reduce the emission impact of traffic arising from the development in line with the National Planning Policy Framework (NPPF).



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29<sup>th</sup> October 2018

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Dear Adam,

### **Former Belton Business Park ~ Phased Works Schedule**

Following discussions with IGE Consulting regarding the processing of the proposed phased works including the handling/processing of the waste and contaminated materials present on the above site. The below highlights a broad brush schedule of works intended for the elements of work to be carried out in each phase.

#### **Phase One:**

- The following works are to be read in line with drawing **SK006**.
- Asbestos cement roof sheets/box gutter and associated flashings to be removed to all main structures and disposed offsite in line with agreed method statements.
- Existing horizontal steel portal frame structure (referred to as the leg) is to be demolished retaining the concrete slab.
- Steel single skin cladding to existing vertical three portal frame is to be removed and disposed of offsite.
- Remaining steel portal frames to receive twin skin steel cladding to roof and walls with the insertion of steel roller shutter/personnel doors.

#### **Phase Two:**

- Carry out sub-structure works for new portal framed building.
- Construct retaining wall structures as shown on **PL006B** forming retention for new warehouse structure and staff car parking area.
- Break up and crush existing concrete slab, distribute within boundary of new retaining wall.
- Excavate waste bunds from southern section of the site and dispose of within boundary of new retaining wall in compacted layers inline with IGE Consulting Method Statement and Remedial Strategy.
- Excavate areas identified to have dog biscuit waste and dispose offsite.

- Import material to make up levels following disposal off site of dog biscuit waste.
- Construct new steel portal frame/staff car park in line with approved drawings and Remedial Strategy.

It is understood that the exact Method Statement for processing the onsite materials will be submitted in line with the IGE Consulting Method Statement (October 2018) following the agreed further testing of the stockpiled / bund materials.

I hope the above information provides guidance on how the phased build process runs in line with the contamination and waste present on site.

Kind Regards,

Tristan Evans  
Director

On Behalf of Crowstone Ltd