
From: EHealth Consultation
Sent: 22 January 2024 14:03
To: Hannah Varley
Cc: Planning (SMDC)
Subject: FW: Information Required DOC/2021/0111 Priory Hotel, Abbots Road, Leek
Attachments: Condition 7 - Contamination assessments.pdf; Proposed Block Plan Priory.pdf

Categories:

Hi Hannah,

RE additional information supplied to address condition 7 (attached). The original comments are reproduced below;

The attached report is again written in an unusual style, which gives the impression that the author is not a typical contaminated land consultant.

Recommendation

Discharge not recommended

Comment

In essence the plots / gardens have been built on a former car park, with the potential for contamination through this use. The author has obtained samples of the tarmac removed (for waste disposal purposes) and has then assumed that no contamination exists beneath the tarmac. This is primarily due to the site history not indicating any past contaminative uses. However, although this argument has some basis, potential still exists for contamination to be present (via leaching of the tarmac) or when the site was used car park prior to the tarmac being placed, or some other factor. In addition no additional soil has been imported to the site (that is from a certified source) for the garden areas to overcome this issue.

The authors assumption therefore that the soil present on site beneath the Tarmac or indeed any other areas it may have been sourced from across the site is suitable for use in the garden/ soft landscaping areas it **remains untested** as no actual direct information (even Geotech -soil profile log has been presented or picture). This assumption therefore needs to be **verified** by the author.

Requirements for discharge

In accordance with condition 7 the author must demonstrate that their assumption that the soil derived from the site or present under the tarmac is suitable for its proposed use.

This can be achieved by undertaking further soil testing in the garden areas. A minimum of 2 samples should be taken from each garden areas by a competent person in the field. 1 within 1-300mm range and one 300-600mm range and supported by photographic evidence.

Kind Regards

Dan

Previous comments

Briefly Comments

A preliminary risk assessment " Preliminary Contamination Risk Assessment Land at: Priory Hotel, Abbots Road, Leek. ST13 6EX" by Punchard Surveying Ltd was submitted to support discharge.

The report is not considered typical and may indicate the consultant is inexperienced in this area. The consultant states they are a "consultant in contaminated land: KIWA" Please can this be confirmed.

Issues

- No actual site/ historic maps history looked at pre 1999?? This is very unusual e.g "Site observations reveal that the site is likely to have only been used for this purpose since 1999, however before this it is unknown" is not an acceptable statement
- They do not even appear to have read our previous comments regarding the need for the assessment – <http://publicaccess.staffs Moorlands.gov.uk/portal/servlets/AttachmentShowServlet?ImageName=237656>
- Heavy reliance on a Groundsure report
- Reference to CLR 11 is now outdated. This has now been superseded <https://www.gov.uk/government/publications/land-contamination-risk-management-lcrm/lcrm-before-you-start>
- No reference to other receptors e.g control waters (noted in the ground sure report?)
- *No certified asbestos survey was undertaken as part of this assessment as it was felt it was not needed due to no structures being on the site. No discarded materials suspected of containing asbestos were observed within the proposed development area.*
This comment certainly has some merit, but the purpose of the desk study is to also highlight historical features that may have contamination potential. that may have been present on the site previous –
- The additional coal tar testing , undertaken by KIWA who are a well-established company in this field and is perfectly acceptable.
However it's not clear for what reason the consultant was getting this particular suite of testing / analysis was undertaken for? Note the testing undertaken was WAC testing – not human health risk. This is needed for likely disposal routes but not really applicable at this stage of this particular assessment.

Thanks

Dan

Dr. Daniel McCrory Principal Pollution Officer

Environmental Health

High Peak Borough Council and Staffordshire Moorlands District Council

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High Peak Borough Council
working for our community

From: Varley, Hannah

Sent: Thursday, January 4, 2024 9:04 AM

To: EHealth Consultation <> **Subject:** FW: Information Required

Good morning,

Since your request for further information regarding DOC/2021/0111 relating to SMD/2019/0573 at Priory Hotel, Abbotts Road, Leek, I have received some further information which I have forwarded to you.

Additionally, the agent has mentioned the following relating to condition 6:

"no soil was to be imported to the site however there was tarmac to be removed and therefore the coal tar testing was completed which was required (this also forms part of 7). Therefore this should cover discharge 6 as discussed."

Your further feedback regarding whether conditions 6 and 7 can be discharged would be greatly appreciated!

Kind regards,

Hannah Varley Trainee Planning Officer

(She/Her)

Development Services

High Peak Borough Council and Staffordshire Moorlands District Council

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From: Info <>

Sent: Wednesday, January 3, 2024 2:08 PM

To: Varley, Hannah <>

Subject: Information Required

Hi Hannah,

Please see attached and also the other conditions have been submitted as per your request.

Please can you confirm you have these.

All the information for conditions 6 and 11 were added to the discharges, though I have added the splay survey below also.

Best Wishes
For Punchard Group

Anita Punchard
Managing Director

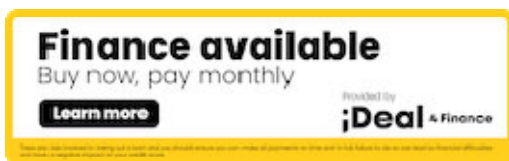
www.punchardgroup.com



We have recently rebranded to incorporate all of our services into one group.



My working hours are Monday, Tuesday and Thursday 9:30am - 3:00pm



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