

Online Comment

Application H03-0457-21
Location Railway Cottage Counter Drain Drove Tongue End PE11 3JH
Proposal Details of external materials and scheme to deal with contamination (Conditions 3 & 7 of H03-0915-20)

Name Sue Armour
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Date Submitted 09-06-21
For/Against Objections

I have reviewed the A&EBC desk top study and site investigation report dated 21/4/21 and make the following comments:

I recommend that the author makes reference to the LCRM available from the gov.uk website and the YALPAG Guidance on phase I and II reports.

The report does not include sufficient background information, for example there has been no examination of historical mapping. Had this been undertaken, it would have been apparent that the former running lines were to the north of the cottage, not the south. The presence of signal box on site would also have been identified.

The report does not make reference to any identified published source for consideration of critical contaminants. The DOE Industry profiles remain useful in this matter.

The conceptual site model does therefore not accurately represent the site.

Some sampling was undertaken, however there were no trial pit logs, and no soil descriptions to BS5930:1999.

Only two samples were undertaken, however they were not taken in the area of the former running lines or signal box.

The samples were sent for Waste Acceptance Criteria (WAC) testing. This is a specific test methodology used by landfills to see if they can accept waste. It has no relevance or use with respect to human health.

One sample of off-site soil was tested for 'total' analysis however total PAH and screening test's such as EPH do not provide sufficient detail for human health comparison. The laboratory was not MCERTS or UKAS accredited and no test methodologies were provided. I refer the author to the YALPAG guidance on imported soils for the information required in this situation.

The report compares these with soil guidelines values. Whilst these have in the most part not been formally withdrawn, they are not commonly used, and reference is generally made to minimal risk values such as the C4SL's or commercially published screening values.

I am therefore not in a position to recommend discharge of the land contamination condition.