

Ms Christie Burns
Copeland Borough Council
Development Control
The Copeland Centre Catherine Street
Whitehaven
Cumbria
CA28 7SJ

Our ref: NO/2023/115491/03-L01
Your ref: 4/23/2191/0F1
Date: 20 March 2024

Dear Ms Burns

PROPOSED ERECTION OF A NEW DWELLING & DETACHED GARAGE.

LAND ADJACENT TO 21 SCURGILL TERRACE, EGREMONT

Thank you for re-consulting us on the above application.

In our most recent response letter, referenced NO/2023/115491/02-L01 and dated 12 March 2024, we maintained our objection due to the lack of supporting information required to assess the risk to groundwater quality.

We have now reviewed the following supporting document, received by email on 13 March 2024;

- Report titled 'PHASE 1: DESK TOP STUDY REPORT - PRELIMINARY GEO-ENVIRONMENTAL RISK ASSESSMENT', prepared by Geo-Environmental Engineering (reference: 2019-3547; dated: 13.02.2019)

Environment Agency position

We maintain our objection to the proposed development due to risks to groundwater quality, and would offer the following comments:-

The Phase 1 Desk Top Study Report, referenced above, supports the previously supplied Phase 2 Ground Investigation Report (referenced: 2021-4817; dated: 6 August 2021).

However, the Phase 1 Report does not, and is not expected to, provide site-specific information on the ground conditions with regard to soluble contaminants as this should be the aim of the Phase 2 Report.

Environment Agency
Lutra House Walton Summit, Bamber Bridge, Preston, PR5 8BX.
Customer services line: 03708 506 506
www.gov.uk/environment-agency

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Whilst no perched water was present in made ground, groundwater was recorded in the underlying gravels. It is anticipated that the fill material will be subject to saturation over changing climatic conditions as perched groundwater above the clay.

The Phase 1 Report recommends a requirement for remediation if water is found, but the capping proposal (See Phase 2 Report) only addresses human health receptors, not the risk to groundwater.

In paragraph 2.1 of the Phase 2 Report (Ground Investigation Aims and Objectives), it outlines the need for *"chemical properties of ground and groundwater across the development area in order to determine any risks to human health or environmental receptors"*. This objective requirement has not been met with the absence of leaching or groundwater sampling and analysis.

In the absence of adequate supporting information, the development poses an unacceptable risk to water quality.

Overcoming our objection

As per our previous response (letter referenced NO/2023/115491/02-L01 and dated 12 March 2024), we suggest that the applicant should provide either of the following in order to address our concerns;

1. Provide evidence to demonstrate that the made ground containing contaminants of concern will be removed from site prior to the commencement of development; or,
2. Provide further information, including conceptual site model, groundwater and /or leaching tests, risk assessment and remedial options, in order to address soluble component of risk to water quality arising from retaining the made ground in situ.

Yours sincerely,

Miss Soraya Moghaddam
Planning Advisor

Direct e-mail clplanning@environment-agency.gov.uk