



Tier Environmental Ltd

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TE1163-TE-00-XX-GE-LT-009-V01

FAO Mr Gaskell

Knowsley Metropolitan Borough Council
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12 October 2023

**TIER RESPONSE TO KNOWSLEY COUNCIL LETTER DATED 11th OCTOBER 2023 –
23/01949/REM**

Dear Ian,

Tier Environmental has produced this letter as a response to the correspondence received from Knowsley Council dated 11th October 2023. Tier has responded to the council's comments below in **Red**.

1. Within the Enabling Works Strategy and Verification Plan, Tier Environmental note that, during the course of the earthworks, asbestos screens will be undertaken every 1000m³ of Made Ground material excavated. It is noted that Tier Environmental will review all the results and provide the data within a Verification Report upon completion of the earthworks exercise. Clarification is sought whether the results of analysis will be reviewed on an on-going and timely basis such that any actions required to address any exceedences for chrysotile asbestos and/or the identification and quantification of different forms of asbestos may be agreed with the LPA and undertaken as the earthworks progress; this is to minimise the potential for remedial actions to be required post completion of earthworks. Clarification is also sought on who will be responsible for undertaking the additional sampling and schedule analysis (and any necessary quantification analysis should asbestos be detected) given that Tier Environmental propose to attend site on a weekly basis (see point 2 below). **Tier Environmental confirm that they will review asbestos results on a weekly basis as results come in from the laboratory. If any positive results are recorded quantification testing will be implemented immediately. If results are returned that record higher concentrations than the acceptable levels detailed within the asbestos DQRA, then further risk assessments will be undertaken and the LPA will be informed. Tier Environmental can also confirm that they will be responsible for the asbestos sampling and scheduling and that these works will be undertaken during the weekly site visits.**

2. Tier Environmental confirm that, whilst their watching brief will be undertaken throughout the entire period that the earthworks are taking place, it is not proposed to be undertaken with full time attendance with site visits proposed on a weekly basis. **Noted.**
3. The Enabling Works Strategy includes for materials tracking and an earthworks watching brief. Section 4.14 of the Enabling Works Strategy states that material movements will be tracked on a 25m grid with materials location and volumes moved recorded. Tier Environmental will also review daily detailed material movement tracking sheets on a weekly basis. **Noted.**
4. It is noted that, at the start of the earthworks, a toolbox talk will be provided by Tier Environmental detailing any potential unexpected contamination procedures and the process to follow should any unexpected contamination is encountered. Confirmation is sought that the toolbox talks will include asbestos? **Tier Environmental can confirm that toolbox talks will include details on the visual identification of suspected asbestos. Ongoing regular discussions with contractors will also be undertaken throughout the earthworks programme to assure standards are being upheld.**
5. The above matters were addressed in respect of Condition 13 of the hybrid application (20/00494/DISCON) within Tier Consult's letter dated 19th August 2022 (*Letter from Tier Consult (Alex Preston) to Knowsley Council (Rebekah McNally), Tier Response to Knowsley Council Letter dated 18th August 2022, dated 19th August 2022, ref TE1163-TE-00-XX-GE-LT-007-V01*). MEAS advise that this information, updated/revised as appropriate for the current application, is required before the part of Condition 58 which relates to the Submission of a Remediation Scheme, can be considered for discharge. **Noted.**
6. A Ground Gas Risk Assessment is presented within the above Ground Investigation Report which concludes that gas protection measures consistent with Characteristic Situation 2 are required. **Confirmation is sought on the potential effects of the proposed mine workings stabilisation works, required to support the proposed development, on the ground gas regime and suitability of the proposed gas protection measures.** **It is considered that the underlying ground gas regime should not be adversely affected by the proposed drill and grouting programme. The maximum encountered carbon dioxide throughout all monitoring visits across the site was 15.6% and the maximum methane was 1.4%, indicating that elevated ground gas concentrations are not being generated at the site. Notwithstanding the above, Tier will be undertaking ground gas monitoring throughout the stabilisation works, both at the drill rig and also in surrounding boreholes, to assess if the works are causing any additional ground gas flow in the subsurface. If any anomalous results are found, then**

works will cease whilst the concentrations are investigated. Once works are complete and the site has been grouted, any potential ground gas flow rates will be greatly reduced under the proposed unit. Tier have thoroughly reviewed the conceptual site model of the site, taking into account the proposed stabilisation works and are satisfied that a CS2 scenario will adequately protect future site users.

7. The submitted Ground Gas Verification Plan (29 March 2023) summarises the proposed gas mitigation measures in line with current British Standards and sets out a Gas Verification Plan. Subject to confirmation of suitability of the proposed gas protection measures (point 6 above) and the approval of the Approved Building Control Inspector, the development should be completed in accordance with the Ground Gas Verification Plan (and subsequent proposed updates). **Noted.**
8. It is noted that the ground gas membrane, installer and detailed specification is to be confirmed in an updated version of the Ground Gas Verification Report. MEAS advise that this should be submitted when available. **Once these contractors have been appointed, Tier will update and resubmit the document.**
9. Inspection and verification requirements are described supported by a Ground Gas Verification Proforma proposed to be used for recording inspections. **Noted.**
10. Foundation solutions must take into consideration the detailed design of the required gas protection measures and the need to avoid creation of vertical preferential pathways. **Currently the proposed foundation solution for Unit 2 is rigid concrete inclusions, with this technique no vertical preferential pathways will be created as the concrete forms an intimate contact with the surrounding soils. If the proposed foundation solution changes Tier will undertake an update to the ground gas risk assessment.**
11. A final Verification Report is to be produced including all supporting evidence. This is required, together with validation information for other aspects of the site works, before this part of Condition 58 can be recommended for discharge. **Noted.**

Materials Management Plan

Part of Condition 58 requires a Materials Management Plan signed off by a Qualified Person, to be submitted to and agreed in writing with the Local Planning Authority prior to the reuse of site won materials. A MMP has not been submitted in support of this discharge of conditions application. Submission of the MMP, signed off by the QP, is required before this part of the condition can be recommended for discharge. **MMP documentation will be submitted alongside this letter.**



For and on behalf of

TIER ENVIRONMENTAL LTD

Alex Preston

Geo-Environmental Engineer

Tier Environmental Ltd