

To:	Planning Services (Planning)	
Planning App. No:	21/00959/COND7	26/00346/PLANDI
Date:	17 February 2026	
Location:	Imagination Two, Image Business Park, Acornfield Road, Knowsley Industrial Park, Kirkby, Knowsley, L33 7SP	
Proposal:	APPLICATION TO DISCHARGE CONDITION 4 (CONTAMINATION) PARTS C, D, F PERTAINING TO PLANNING PERMISSION 21/00959/FUL.	

We are in receipt of the letter from Environmental Health & Consumer Protection (Helen Bradshawe) to Planning Services (Planning), dated 11 February 2026 in reference to Planning App. No: 21/00959/COND7 & 26/00346/PLANDI.

It is noted that the current status is "Further Information Required" and your advisers (MEAS) state that further information is required to satisfy the requirements of Condition 4 Part C (Implementation of Approved Remediation Scheme).

The detail of the requirements are duly noted, and this letter serves to confirm the steps that are being taken to address and satisfy them prior to re-submission of a updated Verification Report (uVR):

1. Further information is required to verify the placement of the clean cover system. No details are provided on the specification of the emplaced cover system with information limited to the results of analysis of 4no. samples of site-won topsoil and confirmation that site won topsoil would be used within the soft landscaping scheme (Wiltren Construction Ltd letter dated 13 October 2025). The recommended specification of the cover system provided within the agreed Remediation and Verification Strategy (Section 5.1) (Delta-Simons, Issue 02, August 2022) includes a high visibility membrane or hard-dig layer and a clean soil layer (minimum thickness of 300mm) in soft landscaped areas. Validation requirements (Sections 5.1.2 of the Remediation and Verification Strategy) include depth verification to confirm the required cover thickness and membrane depth and post-placement sampling and analysis.

Wiltren Construction Ltd (WCL) are undertaking hand-dug trial holes in the soft landscaping to record and photograph the thickness of the topsoil that was laid-down.

A high visibility membrane was installed on top of formation level before topsoil cover was emplaced and photographs taken at the time are being recovered and will be included in the updated uVR.

Although the previously supplied analytical results for the 4no. samples of the "site-won" topsoil are considered to be suitable verification, WCL will also collect soil samples of the emplaced topsoil cover system and submit them for chemical analysis at an environmental testing laboratory.

2. Information provided within Appendix E of the Verification Report shows that whilst a ground gas and hydrocarbon resistant membrane (Juta Titanflex) was installed in the office area, a 1200 gauge damp proof membrane was installed across the remainder of the building footprint. There is no evidence that the specification was agreed with the Local Planning Authority (LPA), as required.

WCL (as the Main Contractor) were acting on technical advice, provided to them by the Project Engineer and Environmental Consultant advising the developer at the time (Powell Tolner & Associates Ltd and Delta Simons).

WCL acknowledge that they did not seek prior approval from the LPA to the change of specification but were acting in good faith and therefore apologise for this oversight.

3. As the CS2 ground-gas regime applies to the entire building, the LPA must be satisfied that all areas of the building have suitable gas protection. Clarification is required that the specification of the installed gas protection measures meets the requirements of BS8485:2015+A1:2019 for a CS2 characterisation across the entire building footprint. No verification evidence is provided for the CS2 gas protection measures for the remainder of the building footprint. Details, as specified in the Remediation and Verification Strategy, are required.

Section 2.0 of the VR (Ground Model) summarises the data that confirms a very low risk ground gas regime on-Site. The ground gas Source is the topsoil/ nominal thickness of Made Ground, and the measured concentrations of ground gas have a Gas Screening Value (GSV) that equals Characteristic Situation CS1. The warehouse building is Building Type D with the offices Type C Offices. It is also noted that Delta-Simons increased the Characteristic Situation to CS2 based on a peak carbon dioxide reading exceeding 5%v/v – however, some of their dataset is not appropriate for use in gas risk assessment due to incorrect well screening depths. Furthermore, the immediate increase of the CS based on a single value of carbon dioxide is not in accordance with BS 8485:2019, which follows an empirical, semi-quantitative approach.

The updated VR will present further detailed narrative assessment of the Delta-Simons data (in accordance with BS 8485:2019) to verify the extant gas protective measures. It will also provide further evidence of the installation verification of the standard membrane below the warehouse floor slab.

4. Epsilon Environmental note that 180no. waste haulage certificates are available upon request. These should be provided for completeness of the validation record.

Please note that the file containing the 180no. waste haulage certificates is 250mb in size and contains 180 individual pages and therefore does not conveniently fit into a PDF document . If required, we can arrange for them to be uploaded to a digital transfer site, but this will only be provided as a temporary download link and not a permanent storage area.

For and on behalf of Epsilon Environmental Limited



Alan Crossfield CEnv
Director